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

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

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

San Antonio

Spill Response Plan


FLINT HILLS
RESOURCES™
Developed by:
TRP
TECHNICAL RESPONSE PLANNING
CORPORATION
9720 Cypresswood Drive #340 · Houston, Texas 77070 USA · Tel: 281-955-9600 · Fax: 281-955-0369 · info@trpcorp.com · www.trpcorp.com

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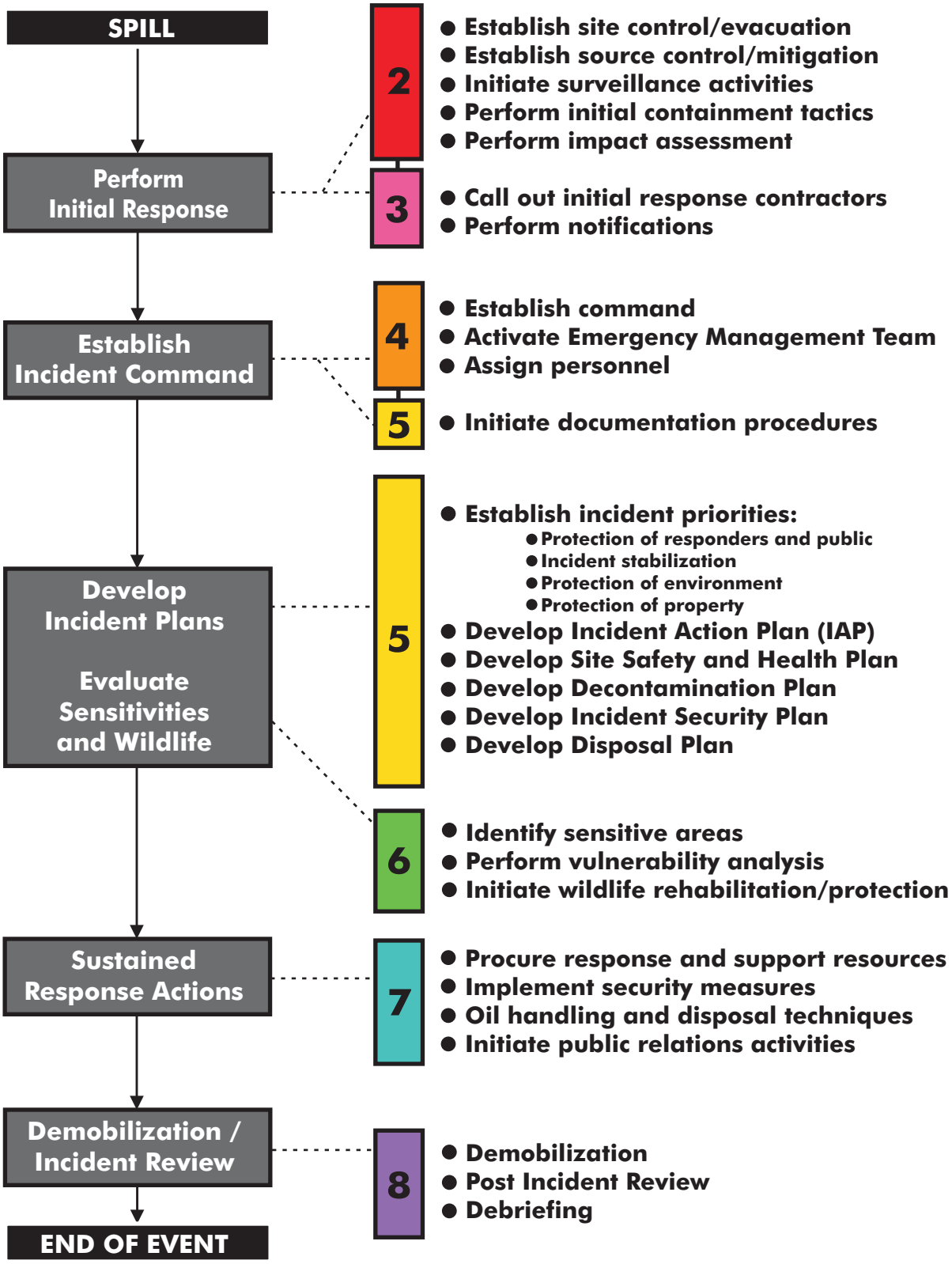
Response Procedures Flow Chart



1. Introduction
2. Initial Response Actions
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SECTION 1 Last revised: September 1, 2011

INTRODUCTION

FIGURE 1-1 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF COPIES		
		PAPER	ELECTRONIC	DISTRIBUTION DATE
The Pipeline Control Center	4111 E. 37th St. N Wichita, KS 67220	1	0	
U.S. EPA Region VI (6SF-RO) Attn: FRP Coordinator	1445 Ross Avenue Dallas, TX 75202-2733	1	0	
Response Plans Officer - Pipeline and Hazardous Material Safety - U.S. Department of Transportation	1200 New Jersey Ave., Room E22-210 Washington , DC 20590	2	0	10/30/2006
Texas Railroad Commission, Office of Pipeline Safety	1701 N. Congress Austin, TX 78701	1	0	
San Antonio Terminal	498 Pop Gunn Drive San Antonio, TX 78219	1	1	
Bastrop Terminal	115 Mount Olive Road Cedar Creek, TX 78612	1	0	
Fort Worth Terminal	12550 Trinity Boulevard Euless, TX 76040	1	0	
Waco Terminal	2017 Kendall Lane Waco, TX 76705	1	0	
Austin Terminal	9011 Johnny Morris Road Austin, TX 78724	1	0	

FIGURE 1-2 - SAN ANTONIO INFORMATION SUMMARY

Owner:	Flint Hills Resources, LP 4111 East 37th Street North Wichita, Kansas 67220

Operator:	Flint Hills Resources Corpus Christi, LLC 498 Pop Gunn Drive San Antonio, TX 78219
Owner Telephone:	(210) 666-6621
Facility Name:	San Antonio
Facility Address:	498 Pop Gunn Drive San Antonio, TX 78219
Facility Latitude/Longitude:	(b) (7)(F), (b) (3) [redacted]
Facility Telephone/Fax:	(210) 666-6621 / (210) 666-4802
Facility FRP #:	06-TX-00400
Description of Facility:	The facility is a bulk fuel storage and distribution terminal. The materials handled at the terminal include various grades and types of gasoline, ethanol, diesel fuel, and fuel additives.

FIGURE 1-2 - SAN ANTONIO INFORMATION SUMMARY, CONTINUED

Qualified Individuals: (Refer to APPENDIX A, FIGURE A.2-3 for QI Training Records)	**Facility**		
	Name and Contact Information	**Work Address**	**Home Address**
	Randy Grimes Terminal Manager Incident Commander (210) 666-6621 (Office) 210-296-8374 *(Mobile)	498 Pop Gun Drive San Antonio, TX 78219	(b) (6) [redacted]
	Business Unit		
	Facility		
	Name and Contact Information	**Work Address**	**Home Address**
	Lance Baker Operations Manager Alternate QI, IC, Ops. (817) 685-3425 (Office) (817) 688-3969 *(Mobile)	12550 Trinity Blvd Euless, TX 76040	(b) (6) [redacted]

FIGURE 1-2 - SAN ANTONIO INFORMATION SUMMARY, CONTINUED

Line Sections/ Products Handled: (Refer to Product Characteristic and Hazards, FIGURE D.10-1)	SECTION	MILEAGE	DIAMETER	PRODUCTS
Facility Data:				

(See APPENDIX C for date and type of substantial expansion)	**Location (Address and County)**	**Hours of Operations/ Manning**	**Throughput**	**Date of Startup**	**Wellhead Protection Area**
	498 Pop Gunn Drive San Antonio, Bexar , TX 78219	Mon - Fri: 7:00 AM - 5:00 PM Sat, Sun and Holidays: Technician on call	The normal daily throughput of product for the facility averages 44,000 barrels.	1989	No
	Current Operations				
	Terminal receives, stores, and delivers gasoline, ethanol, and fuel oil to independent tank trucks for distribution in the greater San Antonio, Texas area.				
Description of Zone:	The pipeline carries refined oil (including Gasoline , Fuel Oil, Ethanol (received by truck)) in the areas shown in **FIGURE 1-3** and **FIGURE 1-4**				
Response Zone Consists of the Following Counties:	Bexar				
Alignment Maps (Piping, Plan Profiles):	Maintained at:				
Worst Case Discharge:	(b) (7)(F), (b) (3) [redacted]				
Statement of Significant and Substantial Harm:	The response zones in this system all contain pipelines greater than 6 5/8 inches and are longer than ten miles. At least one section of pipeline in each response zone crosses a major waterway or comes within five miles of a public drinking water intake. Therefore, in accordance with 49 CFR 194.103(c), each entire response zone described in this Plan will be treated as if expected to cause significant and substantial harm.				
Spill Detection and Mitigation Procedures:	Refer to **SECTION 2.1.1**, **APPENDIX D.2.1** and **APPENDIX D.3**.				
Date Prepared:					

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

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

FIGURE 1-3 - FACILITY AREA MAP

FIGURE 1-4 - FACILITY PHOTOGRAPH

FIGURE 1-5 - FACILITY PLOT PLAN

Click here to view plot plan.

1.1 PURPOSE / SCOPE OF PLAN

The purpose of this Spill Response Plan (Plan) is to provide guidelines to quickly, safely, and effectively respond to a spill. The Facility is owned and operated by Flint Hills Resources Corpus Christi, LLC , herein referred to as "Company."

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

- U.S. Environmental Protection Agency (EPA) requirements for an OPA 90 Plan (40 CFR 112.20)
- Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation requirements for an OPA 90 Plan (49 CFR 194)
- Occupational Safety and Health Administration (OSHA) requirements for emergency response plans (EAP and ERP) (29 CFR 1910)
- Texas State Oil Spill Contingency Plan.

Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes are accomplished by distribution of this plan to the respective agency.

This document includes procedures and forms that are applicable to different types and severities of emergency events. It is intended that the appropriate procedures and forms be used in each event, as detailed herein, but it is not specifically required that every form and/or procedure be used for every emergency event. It is also acceptable to use comparable forms versus those shown in this document, unless such substitution is specifically prohibited in this document or other regulatory documents.

FIGURE 1.1-1 - EPA RESPONSE PLAN COVER SHEET

Owner/ operator of facility:	Flint Hills Resources Corpus Christi, LLC
Facility name:	San Antonio
Facility address (street address or route):	498 Pop Gunn Drive
City, state, and U.S. zip code	San Antonio, TX 78219
Facility mailing address:	As above
Facility phone number.:	(210) 666-6621
Latitude:	(b) (7)(F), (b) (3)
Longitude:	(b) (7)(F), (b) (3)
Dun & Bradstreet number:	06-694-4334
Largest above ground oil storage tank capacity (gallons):	(b) (7)(F), (b) (3)
Number of above ground oil storage tanks:	8 (including additive tanks)
North American Industrial Classification System (NAICS):	5171
Maximum oil storage capacity (gallons):	(b) (7)(F), (b) (3)
Worst case oil discharge amount (bbls.):	(b) (7)(F) (b)
Facility distance to navigable water; mark the appropriate line.	
0-1/4 ☐ 1/4-1/2 mile ☐ 1/2 - 1 mile ☐ > 1 mile ☑	
APPLICABILITY OF SUBSTANTIAL HARM CRITERIA	
Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?	
YES ☐ NO ☑	
Does the facility have a total oil storage capacity greater than or equal to one million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?	
YES ☐ NO ☑	
Does the facility have a total oil storage capacity greater than or equal to one million gallons	

and is the facility located at a distance (as calculated using the appropriate formula in or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
YES ☑ NO ☐
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (using the appropriate formula in or a comparable formula) such that a discharge from the facility would shut down a drinking water intake?
YES ☐ NO ☑
Does the facility have a total oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
YES ☐ NO ☑

CERTIFICATION	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.	
Signature: 	Date: 05/22/2003
Name: Tom Heilman	Title: Area Manager South Texas Pipeline

1.2 PLAN REVIEW AND UPDATE PROCEDURES

In accordance with the regulations cited in **SECTION 1.1**, this plan will be reviewed and modified to address new or different operating conditions or information included in the Plan. In the event that the Company experiences a Worst Case Discharge, the effectiveness of the plan will be evaluated and updated as necessary.

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

If new information or different operating conditions would substantially affect implementation of the Plan, the Company will modify the Plan to address such changes and, within 30 days of making such changes, submit the changes to PHMSA. EPA must receive the changes within 60 days.

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

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS	**EPA**	**PHMSA**	RCRA
Relocation or replacement of the transportation system in a way			

that substantially affects the information included in the Plan, such as a change to the Worst Case Discharge volume.	x	x	
A change in the Facility's configuration that materially alters the information included in the Plan.	x		
A change in the type of oil handled, stored, or transferred that materially alters the required response resources.	x	x	
A change in key personnel (Qualified Individuals).	x	x	
Material change in capabilities of the Oil Spill Removal Organization(s) (OSROs) that provide equipment and personnel.	x	x	
Material change in the Facility's spill prevention and response equipment or emergency response procedures.	x		
Any other changes that materially affect the implementation of the Plan.	x	x	
A change in the NCP or ACP that has significant impact on the equipment appropriate for response activities.		x	
Applicable regulations are revised			x
The plan fails in an emergency;			x
The facility changes in its design, construction, operation, maintenance, or circumstances in a way that materially increases the potential fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;			x
The list of emergency coordinates changes; or			x
The list of emergency equipment changes.			x

All requests for changes must be made through the Terminal Manager and will be submitted to EPA or PHMSA by the Environmental Engineer or Designee.

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

1.3 CERTIFICATION OF ADEQUATE RESOURCES

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

Flint Hills Resources Corpus Christi, LLC

The Flint Hills Resources Corpus Christi, LLC, hereby certify to the Pipeline and Hazardous Materials Safety Administration of the Department of Transportation that they have obtained, through contract or other approved means, the necessary private personnel and equipment to

respond, to the maximum extent practicable, to a Worst Case Discharge or a substantial threat of such a discharge.

Tom Heilman
Area Manager South Texas Pipeline

1.4 AGENCY SUBMITTAL / APPROVAL LETTERS

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SECTION 2 Last revised: February 2006

INITIAL RESPONSE ACTIONS

2.8 Medical

2.9 Sabotage

2.10 Bomb Threat

2.11 Fire and/or Explosion

2.1 SPILL / RELEASE RESPONSE

"General Order of Response" for a Spill or Emergency Event can be as follows:

- Discovery (Detection), Classification and Assessment: This is where the discovery and classification occur and where the initial assessment of severity of the event occurs.
- Security: Ensure security of personnel and the site during the entire response. Allows the opportunity to engage different security needs depending on the nature of the incident.
- Response: Initial Notification, Response, and Mitigation of the event occur at this time. Longer-term, more complex responses which will likely require multiple operational periods will be considered a Sustained Response.
- Closure: Process to conclude an event that has been resolved to the satisfaction of the ICS/UCS (Responsible Party, Federal, State, and Local Agencies).
- Termination and follow-up: The response is terminated, but periodic follow-up or additional remediation activities may be required by the regulating Agencies.

This plan contains check-off sheets and procedures, based on the general order of response, intended to minimize the possibility of omitting critical actions when dealing with emergency events.

2.1.1 Incident Detection

Detection of an emergency event is the first step in an Emergency Incident or Spill / Release response. There are several methods by which an emergency situation may be detected, including the following:

- Detection during an aerial patrol (fly over).
- Detection on the pipeline leak detection system (PLDS) or SCADA systems.
- Reported by private citizens or by public officials.
- Reported by company personnel.
- Reported by contract personnel on site.

2.1.2 Emergency Classifications

There are two classes of emergency events, "reported" and "confirmed".

A "reported" emergency is either an event reported by someone other than a company employee and which cannot be immediately confirmed or a pressure or flow rate change that is not confirmed by a second source.

A "confirmed" emergency is an event reported by a company employee or reported by someone other than a company employee and confirmed by a second source. Any event that threatens lives or public safety if immediate action is delayed, is to be considered a confirmed emergency.

Immediately upon receiving notification of an emergency event/incident, the company employee shall make appropriate internal notifications (**FIGURE 3.1-5**) ensuring the Qualified Individual (QI) and others such as the supervisor and Control Center are advised.

Possible Sources which can be utilized to confirm an emergency event include checking with the supervisory control monitors for signs of problems or confirming information through direct observations by dispatching the nearest available employee to the scene of the reported event.

2.1.3 Assessment

Once an emergency event or release is detected, the need for assessment of the situation is paramount for rapid, reliable, and effective response. In every case, we must collect accurate initial information (**FIGURE 3.1-2**). The information acquired is passed along to responsible company officials to ensure proper actions are taken.

As the situation dictates, additional assessment may be necessary to perform specific activities. For example, the repair team leader may further evaluate the incident for the safest and most effective means to control the release and to repair the source. The Qualified Individual or Incident Commander may perform their own assessment of the situation before taking control of the incident to get the most up-to-date information of the situation for further planning and actions.

During significant events, the incident assessment may be done in concert with Federal and State Agencies. It is the responsibilities of the FOSC to officially classify the size and type of the discharge and normally work within the Unified Command System (UCS) to determine the course of actions to be followed.

INCIDENT ASSESSMENT	
Person Assessing the Incident	
Approach any suspected emergency incident or suspected release cautiously.	☐
Take appropriate personal protective measures (Do not enter any areas without proper PPE).	☐
Eliminate possible sources of ignition in the vicinity of the spill (if applicable, use E-Stops).	☐
Initiate a general site assessment giving emphasis to the following:	
• Immediate danger to the general public	☐
• Immediate danger to the environment (e.g. waterways, wildlife)	☐
• Identify significant impact areas (e.g. drinking water intakes, commercial businesses)	☐
• Identify topographic features that could impact the migration of the spill	☐
• Identify any municipalities or public areas such as churches, parks, etc.	☐
Immediately notify Qualified Individual, Supervisory Personnel and, if necessary, Control Center with the results of your assessment.	☐

Make internal notifications as necessary (**FIGURE 3.1-5**).	☐
Initiate the Initial Incident Response Procedures.	☐

2.1.4 Spill / Release Emergency Response

This section provides a general guidance checklist to identify and mitigate damage due to a leak. This checklist is intended to provide a general approach to cover the emergency situation and does not constitute what actions need to be taken first.

FIGURE 2.1-1 - SPILL / RELEASE RESPONSE ACTION CHECKLIST

INITIAL RESPONSE ACTION	
First Responder (First Person to Respond to Spill)	
Assume role of Incident Commander, will not relinquish this position until formally passed on.	☐
Take appropriate personal protective measures (EH&S Work Permit).	☐
Eliminate possible sources of ignition in the vicinity of the spill (use E-Stops if applicable).	☐
Call 911 if appropriate.	☐
Immediately notify Qualified Individual (QI), Supervisory Personnel, and Control Center, if necessary, of the incident.	☐
Make internal notification, call for resources as needed (**FIGURE 3.1-5**).	☐
If necessary, evacuate or remove nonessential personnel and any general public within the response area.	☐
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.	☐
Call out spill response contractors (**FIGURE 3.1-6**).	☐
Incident Commander	
Confirm or conduct more extensive assessment of health and safety hazards (EH&S work permit). For multiple responders, geographic areas, or more complex responses, Site Safety plan may be needed.	☐
Provide or Confirm Security of area (as necessary). Have nonessential personnel or any general public evacuated. Consider local authorities (police and fire departments) to accomplish the site control recommended.	☐
Call out or confirm Oil Spill Response Contractors (OSRO) or Company-owned spill response resources (**FIGURE 3.1-6**).	☐
As necessary, establish ICS/UCS for Response. It may be necessary to call out members of the IMT. Ensure response objectives are established for emergency and that response activities are being activated.	☐
Make or ensure appropriate notifications have been made; may need to recruit personnel from IMT such as Government Liaison and assign within the ICS. • National Response Center (800) 424-8802	☐

• External Regulatory notifications (**FIGURE 3.1-5**) • Make appropriate internal notifications (**FIGURE 3.1-4)**	
If safe to do so, direct responders to eliminate potential ignition sources in the vicinity of the spill including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.	☐
If safe to do so, direct responders to eliminate, control, and "isolate" 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.	☐
If safe to do so, direct responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.	☐

FIGURE 2.1-1 - SPILL / RELEASE RESPONSE ACTION CHECKLIST, CONTINUED

INITIAL RESPONSE ACTION	
Incident Commander, Continued	
Consider applying foam over the product, using water spray to reduce vapors, grounding equipment handling the oil, and using non-sparking tools.	☐
If the incident is caused by a security event, consider notification to law enforcement personnel and corporate security personnel as well as advising the security officer to take steps to preserve the scene.	☐
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.	☐
If safe to do so, deploy containment/recovery equipment (OSRO or Company-owned) based on release impact.	☐
Maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.	☐
Once deployment of response equipment has been commenced, initiate recovery of product.	☐
Notify Local Emergency Responders (as appropriate). Obtain the information necessary to complete the Oil Spill Report Form (**FIGURE 3.1-3**).	☐
Ensure drug/alcohol testing completed per DOT 199 if applicable (alcohol within 2 hours or max of 8 hours, drug within 32 hours). See DNet for a list of approved Lab Corp Collections Sites.	☐
Evaluate personnel requirements for the initial cleanup. Consider what the operational periods will be necessary and begin planning for the shift/crew replacement.	☐
Initiate spill tracking and surveillance operations. Determine extent of release. Estimate volume of spill utilizing information in **SECTION 2.1.3** or appropriate means.	☐

SITE-SPECIFIC ACTIONS	
DOCUMENT ACTIONS TAKEN	
Once a response has been activated, initiate and direct participants to document the initial assessment and response activities.	☐
Upon establishing an ICS/UCS, ensure there is a unit or people (suggest Situation Unit or Scribe) responsible to require documentation from people engaged in the spill response.	☐
Through the ICS/UCS, ensure that planned and executed response activities are being captured through a general Incident Action Plan (IAP).	☐
Facility drainage and secondary containment will be adequate to contain a spill of small or medium size preventing it from reaching Rosillo Creek. Once the spill has been contained, resources are present at the facility to recover spilled product, safety conditions permitting.	☐
If unable to contain spill to facility property, refer to SECTION 6.8 of the FRP or SECTION 9.0 of the ERAP for location of booming/fill dirt strategy.	☐

FIGURE 2.1-1 - SPILL / RELEASE RESPONSE ACTION CHECKLIST, CONTINUED

PREPARING FOR SUSTAINED RESPONSE ACTION	
Incident Commander, Continued	
Activate Incident Management Team (IMT) (as necessary). Set up a Command Center and begin to utilize the ICS/UCS structure. Establish the site Safe Areas and provide the site with communications in order to coordinate the response effort.	☐
Evaluate and establish a communication plan as necessary. Generally communications will consist of mobile telephones. Other methods may be acquired based on the needs as established by the ICS/ICS.	☐
May consider multiple geographic or cleanup areas depending on size and areas of impact. Ensure equipment is evaluated to be sufficient for different areas if zoned off.	☐
Evaluate safety air monitoring devices and PPE supplies for response.	☐
Planning unit may be established to evaluate the proper containment and response equipment for changing conditions. Maintain vigilance on changing conditions and how will this equipment protect environmentally sensitive areas within the impact area or bordering the impact areas.	☐
Evaluate recovery methods on site; look for efficiency and minimal intrusion into the environment and change accordingly. Consider vacuum trucks skimmers and absorbent material.	☐
Initiate spill tracking and surveillance operations. Determine extent of release. Estimate volume of spill utilizing information in **SECTION 2.1.3** or appropriate means.	☐
Address storage of recovered materials (Disposal Plan).	☐
Establish “Cleanup Assessment Teams” which can determine cleanup progress.	☐

Establish "How clean is clean" parameters which the Cleanup Assessment Teams will utilize to approve the removal of cleanup equipment.	☐
Document response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted. (Refer to **SECTION 5** for documentation)	☐
SECONDARY RESPONSE ACTIONS (Refer to EMT job descriptions in **SECTION 4.6**).	
FACILITY SPECIFIC RESPONSE CONSIDERATIONS (Refer to **SECTION 6** for maps, tactical plans, and sensitivity information.	

2.1.5 Spill Mitigation Procedures

Each spill mitigation situation is unique and must be treated according to the circumstance present. In every situation, however, personnel safety must be assessed as the first priority. The potential for ignition and/or toxic exposure must be promptly evaluated. Spill mitigation procedures are listed in **FIGURE 2.1-1**. Discharge volume calculations are provided in **APPENDIX D.7**.

FIGURE 2.1-2 - SPILL MITIGATION PROCEDURES

TYPE	MITIGATION PROCEDURE
Failure of Transfer Equipment	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations and close valves (if appropriate). 3. Drain product into containment areas (if possible). 4. Eliminate sources of vapor cloud ignition.*
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. Eliminate source of vapor cloud ignition.* 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 valves on each side of the rupture (if appropriate). 3. Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. 4. Eliminate source of vapor cloud ignition.* 5. If piping is leaking and under pressure, relieve pressure by draining into a containment area or to a tank (if possible).

	Consider additional measures for repair.
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 (if appropriate). 3. Attempt to extinguish fire if it is in incipient (early) stage and **if it can be done safely**. 4. Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). Also refer to fire/explosion response procedures in **SECTION 2.11**.
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 valves on both sides of the leak/rupture. 4. Eliminate source of vapor cloud ignition.* 5. Drain fluids back into containment areas (if possible).

* Examples of ignition sources include: roads, houses, farm buildings, railroad tracks, electrical equipment, industrial or manufacturing facilities, office buildings or parking lots, irrigation pumps or water wells, any other source that may contain an open flame, electrical equipment or other ignition source.

2.1.6 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 downgradient to determine the spill's maximum reach.
- Clouds, shadows, sediment, floating organic matter, submerged sand banks, or wind-induced patterns on the water may resemble an oil slick if viewed from a distance.
- Sorbent pads may be used to detect oil on water.
- Use surface vessels to confirm the presence of any suspected oil slicks (if safe to do so); consider directing the vessels and photographing the vessels from the air, the latter to show their position and size relative to the slick.
- It is difficult to adequately observe oil on the water surface from a boat, dock, or shoreline.
- Spill surveillance may be accomplished through various methods: walking, driving, boats, helicopters, or small planes. The use of helicopters may be considered the preferred method 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.

- Observations should be documented. Consider using photographs, video, maps, and pre-determined ICS forms.
- Describe the approximate dimensions of the oil slick based on available reference points (i.e. vessel, shoreline features, facilities); use the aircraft or vessel to traverse the length and width of the slick while timing each pass; calculate the approximate size and area of the slick by multiplying speed and time.
- Consider the use of boats in the event of reduced visibility, such as dense fog or cloud cower; however, this method may not be safe if the spill involves a highly flammable product.
- Consider visual assessment during spill response operations to gauge the effectiveness of response operations, to assist in placing skimmers, and to assess the spill's size, movement, and impact.

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

FIGURE 2.1-3 - SPILL SURVEILLANCE CHECKLIST

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

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

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

Other Observations

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

FIGURE 2.1-3 - SPILL SURVEILLANCE CHECKLIST, CONTINUED

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

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

Spill Sketch

2.1.7 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

One tool available to assist in making this calculation is PRC 1604.209 Release Information Estimating Procedures. There are other tools which can be used, some of which are discussed below:

- **Spill Estimating Spreadsheet**
    - Visual assessment of the surface area and thickness (**FIGURE 2.1-4**); the method may yield unreliable results because:
        - Interpretation of sheen color varies with different observers
        - Appearance of a slick varies depending upon amount of available sunlight, sea-state, and viewing angle

- Different products may behave differently, depending upon their properties

FIGURE 2.1-4 - SPILL ESTIMATION FACTORS ON WATER

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

NOAA, 09/2000

FIGURE 2.1-5 - LEAK SIZE DETERMINATION TABLE

PIPE SIZE	WALL THICKNESS	BBLS/FOOT	BBLS/MILE
6"	.188	.0379342	200.293
8"	.188	.0661017	349.017
10"	.188	.1045450	551.998
12"	.219	.1472539	777.501
12"	.250	.1457746	769.690
16"	.250	.2333852	1232.274
18"	.281	.2952087	1558.702
20"	.281	.3670238	1937.885
24"	.281	.5336190	2817.508

2.1.8 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
- High Consequence Area (HCA) over land spread calculations developed for the Integrity Management Plan

2.1.9 Containment

Containment actions should take into consideration inclement weather or unsafe conditions such as high winds, fast currents, or unstable terrain.

Containment Safety Considerations

More vapors are formed by the spilled liquid during hot weather. As the liquid spreads over a greater area, the vapors form along the leading edge of the liquid and are being exposed to more possible ignition sources. For this reason early containment is important.

- Eliminate ignition sources
- Avoid contact with the spilled product as much as possible
- Use respiratory protection (if applicable)
- Ensure that the area remains secure to applicable traffic (pedestrian, motor vehicles, air traffic)

Containment Goals

The following containment goals should give the responding personnel some guidance enabling them to prioritize the containment efforts.

1. To prevent liquid or vapors from reaching possible ignition sources:

- Roads
- Houses
- Farm buildings
- Railroad tracks
- Electrical equipment
- Industrial or manufacturing facilities

- Office buildings or parking lots
- Irrigation pumps or water wells
- Any other structure or facility that may contain an open flame, spark, or electrical equipment

Containment Goals, Continued

2. To prevent spilled liquid from reaching any environmentally sensitive area:

- Lakes
- Streams
- Rivers
- Wildlife areas
- Marsh environment
- Other environmentally sensitive area (**SECTION 6**)

3. To prevent spilled liquid or vapors from reaching areas containing livestock:

- Horses (stalls)
- Cattle (pens)
- Pigs
- Fowl

Containment Methods / 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
- Ability to collect and recover product

The following methods may be used in containment of a release. It may be necessary to use different methods during one release.

- Earthen dikes or dams
- Spill containment booms
- Absorbents such as hay, straw, dry dirt or sand, and commercial products (peat moss)
- Absorbents such as sorbent pads, socks, booms
- Collection and skimming: diverting and collection in low areas or diversionary structures and removing with skimming equipment such as vacuum trucks or pumps

Note: Understanding that each release is different and circumstances may be unique, some operational areas may have additional details to containment and response methods listed in **SECTION 6** Sensitive Areas / Response Tactics

2.2 EVACUATION

EVACUATION CHECKLIST	
TASK	
Request assistance from off-site agencies; convey Command Post's location	☐
Assemble personnel at predetermined safe location: upwind/up gradient of release (assembly area), **FIGURE C-8**	☐
Account for Company and contractor personnel	☐
Assess injuries/fatalities (number/type/location)	☐
Determine probable location of missing personnel	☐
Secure site, establish re-entry point and check-in/check-out procedures	☐
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.)	☐
Monitor situation (weather, vapors, product migration) for significant changes	☐
Assist in developing a Rescue Plan, if necessary	☐

2.2 EVACUATION, CONTINUED

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Stored material location	• Located in oil storage area • Identified in facility Plot Plan (**FIGURE 1-5**)
Spilled material hazards	• Product characteristics and hazards are identified in **APPENDIX D.10**.
Water currents, tides, or wave conditions	• This is an inland facility and these factors do not impact evacuation of this facility.
Evacuation routes	• Routes are summarized on Evacuation Plan Diagram (**FIGURE C-8**) • Criteria for determining safest evacuation routes from facility may include: wind direction, potential exposure to toxins and carcinogens, intense heat, potential for explosion/fire, and blockage of planned route by fire, debris, or released liquid

Alternate evacuation routes	• Alternate routes may exist; refer to Evacuation Plan Diagram (**FIGURE C-8**)
Injured personnel transportation	• Emergency services can be mobilized to the facility (**FIGURE 3.1-5**)
Alarm/Notification system location	• The alarm/notification system sounds at the office building.
Community evacuation plans	• Company may request local police, county sheriff, and/or state police assistance (**FIGURE 3.1-5**). Community evacuations are the responsibility of these agencies.
Spill flow direction	• South • Identified in facility drainage diagram (**FIGURE C-7**)
Prevailing wind direction and speed	• North to Southeast at 8 to 10 mph • Because wind direction varies with weather conditions, consideration for evacuation routing will depend in part on wind direction
Emergency personnel/response equipment arrival route	• Will be determined at the time of the incident depending on the individual circumstances. • Directions to nearest medical facility provided below

2.2 EVACUATION, CONTINUED

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Centralized check-in area (personnel assembly area)	• Primary check-in is in front of the main office at the parking lot. The secondary check-in point is at Pop Gunn St. and East Houston. • Supervisor/Senior employee is responsible for head count
Mitigation Command Center location	• Initial Command Center will be determined at the time of the incident, but the office building will generally be used unless it is not a safe location. • Mobile Command Posts may be established as necessary
Facility Shelter Location	• Will be determined at the time of the incident. • Not a safe harbor from fires, explosions, vapor clouds, or other significant emergencies; however, may be used for temporary

	shelter from inclement weather
Directions to nearest medical facility	Directions to Brooke Hospital, San Antonio : • Start out going south on Pop Gunn Dr toward E Houston St./ FM 1346. Turn left onto E Houston St./ FM 1346 E. Turn left onto NE I-410-Loop. Merge onto I-410 N via the ramp on the Left toward I-10. Merge onto I-35 S/ US-81 S via EXIT 31 on the Left toward San Antonio/ Binz-Englemann Rd. Take the exit toward FM-78 / KIRBY. Turn Slight Left onto NE I-410-LOOP. NE I-410-Loop becomes N I-35/ N Pan AM EXPY/ N PANAM EXPY. Turn Left onto Binz-Engleman Rd. Turn Right onto George C Beach Ave. Turn Left onto Roger Brooke Dr. Make a U-turn at Roger Brooke Dr onto Roger Brooke Dr. Brooke Army Medical Center is located at 3851 Roger Brooke Dr # 3600, Fort Sam Houston, TX 78234, US.

2.3 LIGHTNING

LIGHTNING CHECKLIST	
TASK	
Maintain equipment grounding systems to dissipate the effects of a lightning strike.	☐
Provide lightning arrestors on electrical equipment throughout the system.	☐
During thunderstorms, personnel are to avoid the following: • Storage Tanks • Pumping Equipment • Being in contact with or in close proximity to above ground piping or any non-insulated device attached to the pipeline • Trees and metal buildings • Open fields • Holding metallic objects	☐
During thunderstorms, personnel should be aware of the potential for lightning and remain alert for strikes that may affect the pipeline operation.	☐

Possibly the most frequent effect of lightning is the interruption of electric power or communications to one or more locations on the pipeline. These events are covered in "abnormal" operation procedures described in the Operations Manual.

The most devastating effect of lightning is the striking of a tank and resulting fire. The response to a fire or explosion event is outlined in the **SECTION 2.11**.

2.4 EARTHQUAKES

Earthquakes generally strike without warning, making them very difficult to prepare for. While the initial quake may be unpredictable, there is a certain amount of post-quake activity accompanying most quakes. These procedures should be followed in the aftermath of an earthquake:

The Pipeline Control center has registered with the USGS to receive earthquake notifications within the operational areas of the continental USA. Based on the magnitude and distance of the earthquake the following procedures should be followed in the aftermath:

EARTHQUAKES CHECKLIST	
Stations and Terminal	
If an earthquake is within a 50 mile radius of the asset, the following is completed based on the magnitude.	
2.0 to 2.9 - Pipeline Control Center will notify the station or terminal of the earthquake. Inspect the asset at the next scheduled station walkthrough.	☐
3.0 to 3.9 - Pipeline Control Center will issue a "Priority 3" notification for a visual inspection of the station.	☐
4.0 to 4.9 - Pipeline Control Center will issue a "Priority 2" notification for a visual Inspection of the station.	☐
If an earthquake is within a 100 mile radius of the asset, the following is completed based on the magnitude.	
5.0 to 5.9 - Pipeline Control Center will issue a "Priority 2" notification for a visual Inspection of the station.	☐
> 6.0 - Pipeline Control Center will issue a "Priority 0" notification to shut down the station until a visual inspection is completed.	☐
Underground Pipelines	
If an earthquake is within a 100-mile radius of the asset, the following is completed based on the magnitude.	
5.0 to 5.9 - Pipeline Control Center will notify the PCC communicator scenario of the earthquake; plus reduce to 50% MOP and monitor for 12 hours. Operation Management will evaluate what other actions may be necessary on a case-by-case basis.	☐
> 6.0 - Pipeline Control Center will notify the PCC communicator scenario of the earthquake and shut the pipeline until a visual inspection is completed; plus operate at 50% MOP for 12 hours once the pipeline is brought back on.	☐

Priority 3 = means within 24-hours of receiving notice of the earthquake occurrence and coupled with the control center is not registering any alarms.
Priority 2 = means as soon as feasible, safe, and practical; to coincide with the earliest available daylight to give the best viewing possible and coupled with the control center is not registering any alarms.
Priority 1 = registers a high sense of urgency; contact pipeline operator on call-out whatever the time of day or night it may be.
Priority 0 = registers the highest sense of urgency, Shut station down and contact pipeline operator on call-out whatever the time of day or night it may be.

2.5 TORNADO

TORNADO CHECKLIST	
TASK	
Monitor news media reports (**FIGURE 3.1-5**) • Tornado watch means conditions are favorable for tornadoes • Tornado warning means a tornado has been sighted	☐
When a tornado warning is issued, sound the local alarm	☐
Have location personnel report to the designated area	☐
Account for personnel on duty	☐
Take shelter: • Go to an interior room on the lowest floor or designated storm shelter • Get under a sturdy piece of furniture • Use your arms to protect head and neck	☐
If the facility is damaged by the tornado, notify Supervisory Personnel	☐
Go to the scene of the incident to evaluate the situation • Be aware of broken glass and downed power lines • Check for injuries • Use caution entering a damaged building	☐
Update Supervisory Personnel/Management	☐
Conduct post-emergency evaluation and report	☐

2.6 HURRICANE

Since hurricanes are very erratic in nature, Hurricane Preparedness Plan SOP (Standard Operating Procedures) will be implemented and followed when a storm path is predicted for a particular operational area. The SOP will provide procedures for a safe and orderly shutdown of operational assets within the predicted storm path. The procedures will also enact an organized tracking effort for hurricane preparedness activities which will allow for employees to handle company as well as their own domestic hurricane preparedness needs.

The Hurricane Preparedness Plan (SOP) is divided into two sections based on potential weather survey tracking forecasts and the timetables predicted for landfall within operating assets.

HURRICANE CHECKLIST	
TASK	
Tropical Storm / Hurricane forms and is being tracked by National Weather Surveys	

Hurricane Season begins, general coastal areas heighten awareness to storm reports.	☐
Tropical Storm/Hurricane forms or enters general area of operational assets.	☐
Hurricane Preparedness Standard Operating Procedures Implemented	
Tropical Storm/Hurricane is 48 - 36 hours away and path is predicted in the direction of the operational assets threshold parameter to implement the Hurricane Preparedness Plan (SOP).	☐
Hurricane Preparedness Plan (SOP) is implemented.	☐

2.7 FLOOD

FLOOD CHECKLIST	
TASK	
When conditions warrant, perform continuous monitoring of the situation by listening to radio and/or television reports (**FIGURE 3.1-5**) • Flash flood watch means flooding is possible • Flash flood warning means flooding is occurring or is imminent	☐
As appropriate, update Supervisory Personnel	☐
Establish an evacuation plan (**SECTION 2.2**)	☐
Take preliminary actions to secure the facility before flooding and mandatory evacuation	☐
Consider having sandbags brought to sites that could be affected by the flooding	☐
Consider obtaining portable pumps and hoses from local suppliers or from other petroleum service locations in the area	☐
Consider removing product from underground storage tanks, sumps, and separators (if applicable). Consider replacing with water to prevent them from floating out of the ground	☐
Keep at least a normal bottom in above ground tankage, more if possible	☐
Plug rack drains and facility drains connected to the sump	☐
Consider anchoring bulk additive tanks, fuel barrels, empty drums, and propane tanks (if applicable)	☐
Notify Supervisory Personnel/Management that the facility will be closed	☐
Consider shutting off high voltage power and natural gas lines	☐
Close valves on product and additive storage tanks	☐
Before evacuation, know where employees will be residing and obtain phone numbers so they can be contacted if additional emergencies occur	☐
Conduct a post-emergency evacuation and report	☐
Maintain hazards awareness:	

• Structural damage • Downed power lines • Leaking natural gas, water, and sewer lines • Poisonous snakes and other wildlife sheltering in structures, vehicles, and furniture • Avoid direct contact with flood water, mud, and animal carcasses	☐

2.8 MEDICAL

MEDICAL CHECKLIST	
TASK	
Summon Emergency Medical Services (EMS) to the scene (**FIGURE 3.1-5**)	☐
Do not move the patient unless a situation (such as a fire) threatens patient's life	☐
If trained, provide first aid until the EMS arrive at the scene	☐
As the situation warrants, try to stop the bleeding and keep the patient breathing until the EMS arrive at the scene	☐
The rescuer's role includes: • Removing the patient from any situation threatening patient's life or the lives of rescuers • Correcting life-threatening problems and immobilizing injured parts before transporting the patient • Transporting the patient in a way that minimizes further damage to injured parts • Administering essential life support while the patient is being transported • Observing and protecting the patient until medical staff can take over • Administering care as indicated or instructed	☐

2.9 SABOTAGE

(b) (7)(F), (b) (3)

[redacted]

(b) (7)(F), (b) (3)

[redacted]

2.10 BOMB THREAT

(b) (7)(F), (b) (3)

[redacted]

(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

[redacted]

2.11 FIRE AND/OR EXPLOSION

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

The first responder's initial objective is site management.

FIRE AND/OR EXPLOSION CHECKLIST	
TASK	
At a manned facility	
Evaluate the situation; approach cautiously from upwind; do not rush in	☐
Notify the local police and fire departments (as appropriate)	☐
Notify Supervisory Personnel	☐
Appropriately trained personnel may attempt to extinguish the fire if it is in the incipient (early) stage and **if it can be done safely**	☐
If the fire/explosion is a result of a pipe rupture, isolate product release by closing valves	☐
Undertake basic site control: • Make an assessment of hazards • Isolate the area • Keep people away from the scene and outside the safety perimeter as per the evacuation plan (**SECTION 2.2**) • Establish safety zones and escape routes	☐
Respond to the fire: • Establish a Command Post and lines of communication • Maintain site control • Establish Incident Command/Unified Command as necessary (**SECTION 4.4**)	☐
Call in additional resources if on-scene personnel and equipment are inadequate to handle the emergency (**FIGURE 3.1-5**, **FIGURE 3.1-7**)	☐

Conduct a post-emergency evaluation (**SECTION 8.3**) and report	☐

2.11 FIRE AND/OR EXPLOSION, CONTINUED

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

The first responder's initial objective is site management.

FIRE AND/OR EXPLOSION CHECKLIST, CONTINUED	
TASK	
At an unmanned facility	
Handle the call	☐
Notify the local police and fire departments (as appropriate)	☐
Notify Supervisory Personnel	☐
Go to the incident scene to evaluate the situation; approach cautiously from upwind; do not rush in	☐
Undertake basic site control: • Make an assessment of hazards • Evaluate the area for visitors or personnel in the area prior to the event • Isolate the area • Keep people away from the scene and outside the safety perimeter as per the evacuation plan (**SECTION 2.2**) • Establish safety zones and escape routes	☐
Update Supervisory Personnel/Management	☐
If the fire/explosion is a result of a pipe rupture, isolate the product release by closing valves	☐
Respond to the fire: • Establish a Command Post and lines of communication • Maintain site control • Establish Incident Command/Unified Command as necessary (**SECTION 4.4**)	☐
Call in additional resources if on-scene personnel and equipment are inadequate to handle the emergency (**FIGURE 3.1-5**, **FIGURE 3.1-7**)	☐
Conduct a post-emergency evaluation (**SECTION 8.3**) and report	☐

SECTION 3 Last revised: September 1, 2011

NOTIFICATIONS / TELEPHONE NUMBERS

3.1 EMERGENCY INFORMATION AND NOTIFICATION PROCEDURES

There are two classes of emergency events, "reported" and "confirmed."

A "reported" emergency is either an event reported by someone other than a company employee and which cannot be immediately confirmed or a pressure or flow rate change that is not confirmed by a second source.

A "confirmed" emergency is an event reported by a company employee or reported by someone other than a company employee and "confirmed" by a second source. Any event that threatens lives or public safety if immediate action is delayed, is to be considered a confirmed emergency.

In either case, upon receiving notification about an emergency event, the company employee will take immediate actions (**SECTION 2**) and begin notification procedures based on the situation.

The general “Internal Incident Notification Sequence” is as follows:

- **First:** Isolate the source and then call emergency services
- **Second:** Call 1-877-376-0532:
- **Third:** Enter User ID: 4157 #:
  - Enter PIN: 5624# (KOCH)
- **Fourth:**:
  - Scenario ID 315: KPL / FHR STX Joint Response, Report of an Incident
  - Scenario ID 311: FHR South Texas, Report of an Incident
- **Fifth:**:
  - Press 2 to record the message
  - Press 3 to start the scenario (activate). You will hear the system say "The scenario is building" then press # to end the call.

3.1 EMERGENCY INFORMATION AND NOTIFICATION PROCEDURES, CONTINUED

Should the person making notifications encounter problems with the notification process listed above, individual calls may be required to ensure appropriate notifications are made.

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

Information required (in order below):

1 - Your name and phone number, type of incident reported and location

2 - Supervisor name.

3 - Time and Date

4 - Product released and estimated quantity

5 - Source of release

6 - Affected medium (Land or Water)

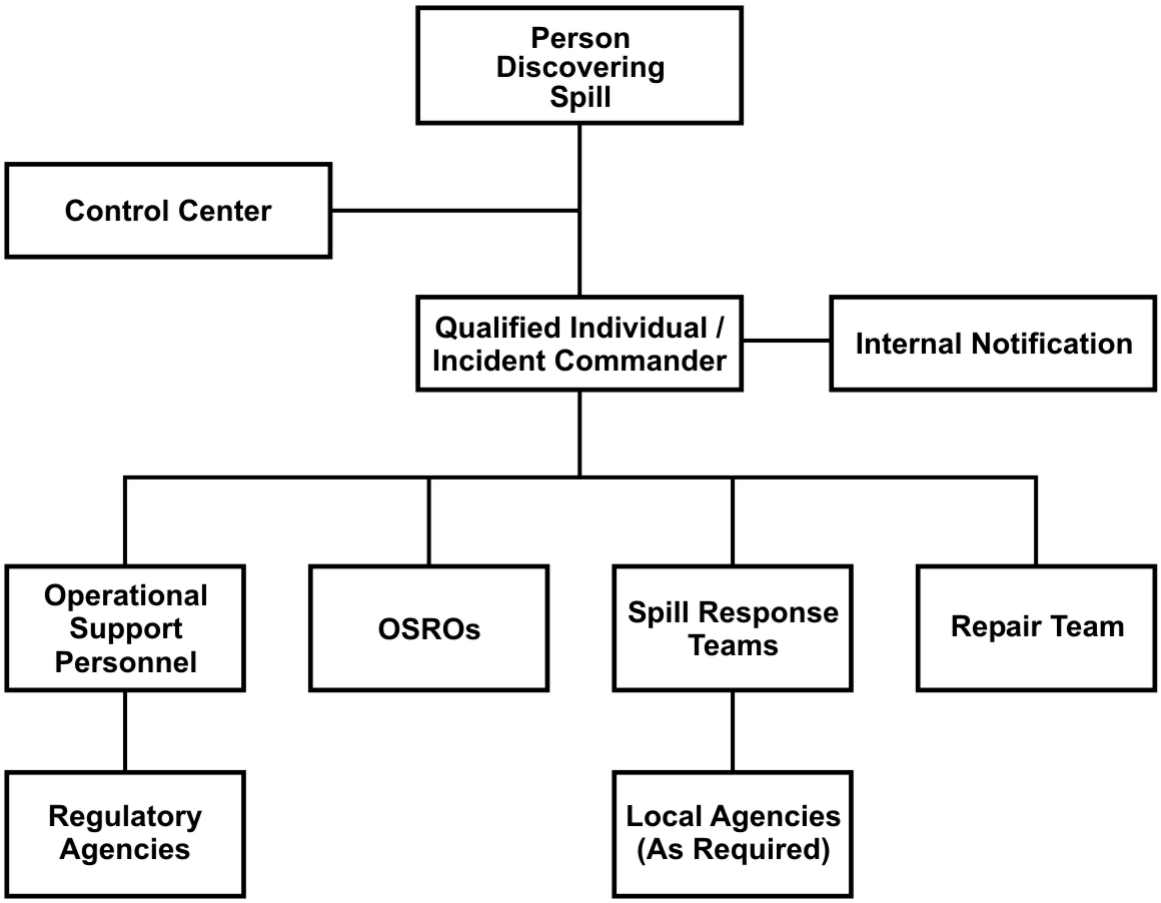
7 - Affected employee (if applicable)

8 - Has area been secured?

Note: Remember -

1) **Safety is our #1 concern**
2) **Report only the facts!**

FIGURE 3.1-1 - EMERGENCY NOTIFICATION FLOW CHART



This section also contains the following:

- FIGURE 3.1-2 provides an Incident Report Form. This form is utilized for initial internal reporting.
- FIGURE 3.1-3 provides a PHMSA Spill Report Form. This form is utilized for initial PHMSA external reporting.

- FIGURE 3.1-4 provides an Oil Spill Report Form. This form is utilized for initial and follow-up notifications. Follow-up notifications are the responsibility of the Liaison Officer.
- FIGURE 3.1-5 provides internal notification summary and documentation form to assist in documenting notifications.

FIGURE 3.1-2 - SUPERVISOR'S IMMEDIATE REPORT

The current version of the Supervisor's Immediate Report can be found in the compliance section of the Terminals Webpage under Incident Reporting.

FIGURE 3.1-3 - PHMSA SPILL REPORT FORM
(This is guidance for information to be supplied to PHMSA)

1. **NAME AND ADDRESS OF COMPANY:**

2. **NAME OF PIPELINE:**

3. **TIME OF DISCHARGE:**

4. **LOCATION OF DISCHARGE:**

5. **TYPE OF OIL INVOLVED:**

6. **REASON FOR DISCHARGE (e.g., material failure, excavation damage, corrosion):**

7. ESTIMATED VOLUME OF OIL DISCHARGED:

8. WEATHER CONDITIONS ON SCENE:

9 ACTION TAKEN OR PLANNED BY PERSONS ON SCENE:

FIGURE 3.1-4 - OIL SPILL REPORT FORM

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION**

INVOLVED PARTIES			
Reporting Party		**Suspected Responsible Party**	
Name:		Name:	
Phone:	(Day)	Phone:	(Day)
	(Evening)		(Evening)
Position:		Company:	
Company:		Organizational Type: ☐ Private Citizen ☐ Private Enterprise ☐ Public Utility ☐ Local Government ☐ State Government ☐ Federal Government	
Address:			
Person Discovering Incident			
Name:			
Company/Organization:			
City: State: Zip:			
Were materials released? ☐ Yes ☐ No		Calling for Responsible Party ☐ Yes ☐ No	
INCIDENT DESCRIPTION			
Date:	Time: ☐ AM ☐ PM	Weather:	
Incident Address/Location:		Latitude: _____ degrees _____ min _____ sec N	

	Longitude: (if available) degrees min sec W
Mile Post/River Marker:	
City/County:	Distance from City:
State:	Direction from City:
Source and Cause of Incident:	
Storage Tank Type: ☐ Above Ground ☐ Below Ground ☐ Unknown	
Tank Capacity:	Facility Capacity:

MATERIAL INFORMATION

CHRIS Code (if available)	Product Released	Released Quantity (Include units of measure)	Quantity in Water (Include units of measure)

Note: Refer to the Incident Database for spill history and spill reporting.

FIGURE 3.1-4 - OIL SPILL REPORT FORM, CONTINUED

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION**

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

RESPONSE ACTION(S)

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

ADDITIONAL INFORMATION
Any information about the incident not recorded elsewhere in the report (e.g., duration of spill, treatment or disposal measures).

COMPLETED NOTIFICATIONS

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

Note: Refer to the Incident Database for spill history and spill reporting.

FIGURE 3.1-5 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24-Hour Number

FACILITY RESPONSE TEAM

NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	RESPONSIBILITY DURING RESPONSE ACTION	RESPONSE TRAINING TYPE[1]		
				1	2	3
Randy Grimes Terminal Manager	(210) 666-6621 (Office) 210-296-8374	1	Incident	x	x	x

Qualified Individual	*(Mobile)		Commander			
Stephen Lopez Instrument & Electrical Technician	210-662-0807 (Office) (210) 296-9041 *(Mobile)	1		x	x	
Eric Mireles Terminal Operator	(210) 662-0807 (Office) (210) 563-0021 *(Mobile)	1		x	x	
Gary Schweikert Terminal Operator	210-666-6621 (Office) 210-296-8378 *(Mobile)	1		x	x	
Mark Harnandez Operations Technician	210-666-6621 (Office) 512-922-3448 *(Mobile)	1		x	x	

NOTE: Training records will be maintained in accordance with the Company Records Retention Schedule.

FIGURE 3.1-5 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24-Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**RESPONSIBILITY DURING RESPONSE ACTION**	**RESPONSE TRAINING TYPE[1]**		
				1	**2**	**3**
Lance Baker Operations Manager **Qualified Individual**	(817) 685-3425 (Office) (817) 688-3969 *(Mobile)		Alternate QI, IC, Ops.	x	x	x
Pipeline Control Center (Southern Console)	(800) 666-9045 (Office)					
Katie Stavinoha	281-363-7260 (Office)					

Director Public Affairs	713-459-7340 *(Mobile)		Public Affairs			

EMERGENCY RESPONSE TRAINING TYPE[1]	
There are three different types of training described below including HAZWOPER, OPA, and Qualified Individual/Incident Command Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual.	
TYPE[1]	**DESCRIPTION**
1	29 CFR 1910.120 HAZWOPER
2	OPA (Training Reference for Oil Spill Response) All Facility Personnel, IMT, QI Components
3	Qualified Individual/Incident Command Training

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

FIGURE 3.1-6 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24-Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
National Response Center (NRC) c/o USCG 2100 2nd Street, Southwest Room 2111-B Washington, DC 20593-0001	(800) 424-8802* (202) 267-2675* (202) 267-1322 (Fax) TDD: (202) 267-4477	
Recommended		
State Agencies		
State Emergency Response Commission (SERC) Texas Divsion of Emergency Management (TCEQ / TGLO / RRC) PO BOX 4087, MSC 0223 Austin, TX 78733	(800) 832-8224 (800) 452-2791 (512) 424-5677	
Texas Department of Parks and Wildlife 4200 Smith School Road Austin, TX 78744	(512) 389-4848	
Texas General Land Office 1700 North Congress Avenue Room 340 Austin, TX 78701	(800) 832-8224 (Spills) (512) 475-1575(Main, not spills)	

Texas Railroad Commission - Office of Pipeline Safety, Austin, Texas 1701 North Congress Avenue Austin, TX 78701 PO Box 12967 Austin, TX 78711-2967	(512) 463-6788 (512) 463-7319	
Local Agencies		
Bexar Co. LEPC 203 West Nueva Suite 302 San Antonio, TX 78207	(210) 335-0300	
Fire Departments		
San Antonio Fire Department 214 West Nueva San Antonio, TX 78207	(210) 207-7744 911	
Hospitals		
Brooke Army Medical Center 3851 Roger Brooke Dr # 3600 Fort Sam Houston, TX 78234	(210) 916-3400	
Law Enforcement		
Bexar Co. Sheriff Department 203 West Nueva Street Suite 309 San Antonio, Texas 78207	(210) 335-6000 911	
San Antonio Police Department 214 West Nueva San Antonio, TX 78207	(210) 207-7273 911	

FIGURE 3.1-7 - OIL SPILL RESPONSE CONTRACTOR RESOURCES AND TELEPHONE NUMBERS

*24-Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
USCG Classified OSRO's		
TAS Environmental Services, LP (San Antonio) San Antonio, Texas	888-654-0111 (210) 496-5310 (210) 496-5312 (Fax)	
Eagle SWS, (San Antonio) Cibolo, TX	(210) 566-8366 (210) 566-6247 (Fax)	
Miller Environmental Services, Inc. Corpus Christi, TX	(361) 289-9800 (24-hr) (361) 289-6363 (Fax)	

FIGURE 3.1-8 - ADDITIONAL RESOURCES, NOTIFICATIONS, AND TELEPHONE NUMBERS

*24-Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Additional Services		
REISS Remediation 20 Greenway Plaza Houston, TX 77046 Attn. Michael Christopher	(713) 544-3016 (Office) (832) 264-3654 (Cell)	
Laboratories		
Alcor PetroLab, L.L.P. 33 Laboratory Road Floresville, TX 78114	(830) 216-2112 (830) 216-3113	
AnalySys, Inc. 3512 Montopolis Drive Austin, TX 78744	(512) 385-5886 (512) 385-7411 (Fax)	
Southwest Research Institute 6220 Culebra San Antonio, TX 78258	(210) 522-2122 (210) 522-2071	
Neighboring Facilities		
Union Pacific Railroad 1400 Douglas Street Omaha, NE 68179	(888) 877-7267 (24/7 emergency number) (888) 870-8777	
Radio Rentals		
TAS Environmental 14350 Lookout Rd. San Antonio, TX 78233	210-496-5310	
Storage Tanks Rentals and RORO's		
Bakercorp 533 McBride Lane Corpus Christi, TX 78408- Corpus Christi 459 Cargill Road Kilgore,TX 75662- Kilgore 22345 IH 35 South New Braunfels, TX 78132- San Antonio 7818 South Cooper Street Arlington, TX 76001- Dallas	(361) 289-7708 (Corpus Christi) (903) 983-2916 (Kilgore) (817) 608-0576 (Dallas) (830) 606-7788 (San Antonio)	
Vacuum Truck Services		
Alamo Environmental 10843 GulfDale	(800) 322-5085 (210) 404-1220	

San Antonio, TX 78216		
H & K Vacuum Trucks Inc 1010 Sodville Street Sinton, TX 78387 P.O. Box 1340 Sinton, TX 78387	(361) 364-4311 (361) 364-5920 (Fax) 800-456-9430	
Key Energy 4007 U.S. Highway 77 south Victoria, TX 77905	(361) 782-7184 (Dispatch) (361) 578-1047 (Fax)	
Wildlife Rehabilitation		
Wildlife Rehabilitation and Education 7007 Katy Road Houston, TX 77024 (Must contract through Miller Environmental)	(713) 861-WILD (713) 279-1417 (Oil Spill) (281) 731-8826 (cell phone)	

SECTION 4 Last revised:

RESPONSE TEAM ORGANIZATION

4.1 DESCRIPTION

The Incident Management Team (IMT) has been created and organized to plan for and manage emergencies. The IMT is composed of Company personnel from offices within the Area. Additional personnel from outlying offices can be used (if needed). The IMT will develop strategies and priorities for a response, then will supervise contractors, handle safety and security matters, and will provide logistical support for contractor personnel. The IMT will handle all communications with the media and the public (**SECTION 7.2**). Job descriptions for each IMT member are provided in **SECTION 4.6**. The IMT will train by participating in exercises as noted in APPENDIX A.1.

4.2 ACTIVATION PROCEDURES

Activation of the IMT may be accomplished in stages. Initially, the First Responder assumes the role of Incident Commander (IC). During an incident, the initial IC may be able to respond without assistance from the IMT. If the situation requires more resources, the First Responder having assumed the role of the IC, may request additional personnel or management support from the IMT through the QI and the notification process. Depending on the situation, the QI may assume the role of Incident Commander. Having adopted the ICS/UCS protocols as the company response management system, the QI/IC can call out the other IMT members to expand or contract as needed by the requirements of the specific incident. The IMT activation procedure is provided in FIGURE 4.5-1.

4.3 TEAM MEMBER RESPONSE TIMES

See **FIGURE 3.1-4** for each team member's response time "EPA Facilities only".

4.4 INCIDENT COMMAND SYSTEM / UNIFIED COMMAND STRUCTURE

The Incident Command System (ICS) will be used by the Company IMT for managing emergencies. The IMT organization chart is provided in FIGURE 4.5-2. The organization can be expanded or contracted as necessary for any specific incident. Not all sections or jobs need to be established. The Incident Commander and General Staff will decide on the components to be activated.

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

- Federal On-Scene Coordinator (FOSC)
- State On-Scene Coordinator (SOSC)
- Company Incident Commander (may also be the QI)

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 Incident Management Team. Refer to **SECTION 4.6** for detailed checklists of the IMT roles and responsibilities as well as organizational interfaces with external parties.

4.5 QUALIFIED INDIVIDUAL (QI)

Authority and Responsibilities

The Qualified Individual (QI) is an English-speaking representative available on a 24-hour basis and capable of arriving at the facility in a reasonable time.

As required by the Oil Pollution Act of 1990, the QI(s) identified have full authority to:

- Activate and contract with oil spill removal organization(s),
- Activate personnel and equipment maintained by the operator,
- Act as a liaison with the pre-designated Federal On-Scene Coordinator (OSC), and
- Obligate funds necessary to carry out required or directed response actions

Each QI identified is:

- Located in the United States,
- Familiar with the implementation of the response plan, and
- Trained in the responsibilities of the qualified individual under the response plan.

QI responsibilities include:

- Activate internal alarms and hazard communication systems to notify facility personnel;
- Notify response personnel, as needed;
- Identify the character, exact source, amount, and extent of the release, as well as the other items needed for notification;
- Notify and provide necessary information to the appropriate Federal, State, and local authorities with designated response roles, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee;
- Assess the interaction of the discharged substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment;
- Assess the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (i.e., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosion;
- Assess and implement prompt removal actions to contain and remove the substance released;
- Coordinate rescue and response actions as previously arranged with all response personnel;
- Use authority to immediately access company funding to initiate cleanup activities; and
- Direct cleanup activities until properly relieved of this responsibility.

4.5 QUALIFIED INDIVIDUAL (QI), CONTINUED

If off-site, the QI will coordinate with Incident Commander to ensure company response plan is implemented for the emergency response; ensure a response is occurring.

Once on-site, the QI may assume the responsibilities of the Incident Commander and assume overall command of the response operations as described in **SECTION 4.6**.

For further information on Qualified Individual's training, refer to **APPENDIX A.2**. Phone numbers for Qualified Individuals are provided in **FIGURES 1-2 and 3.1-4**.

For the purposes of 40 CFR 265 the QI is assumed to be the Emergency Coordinator.

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

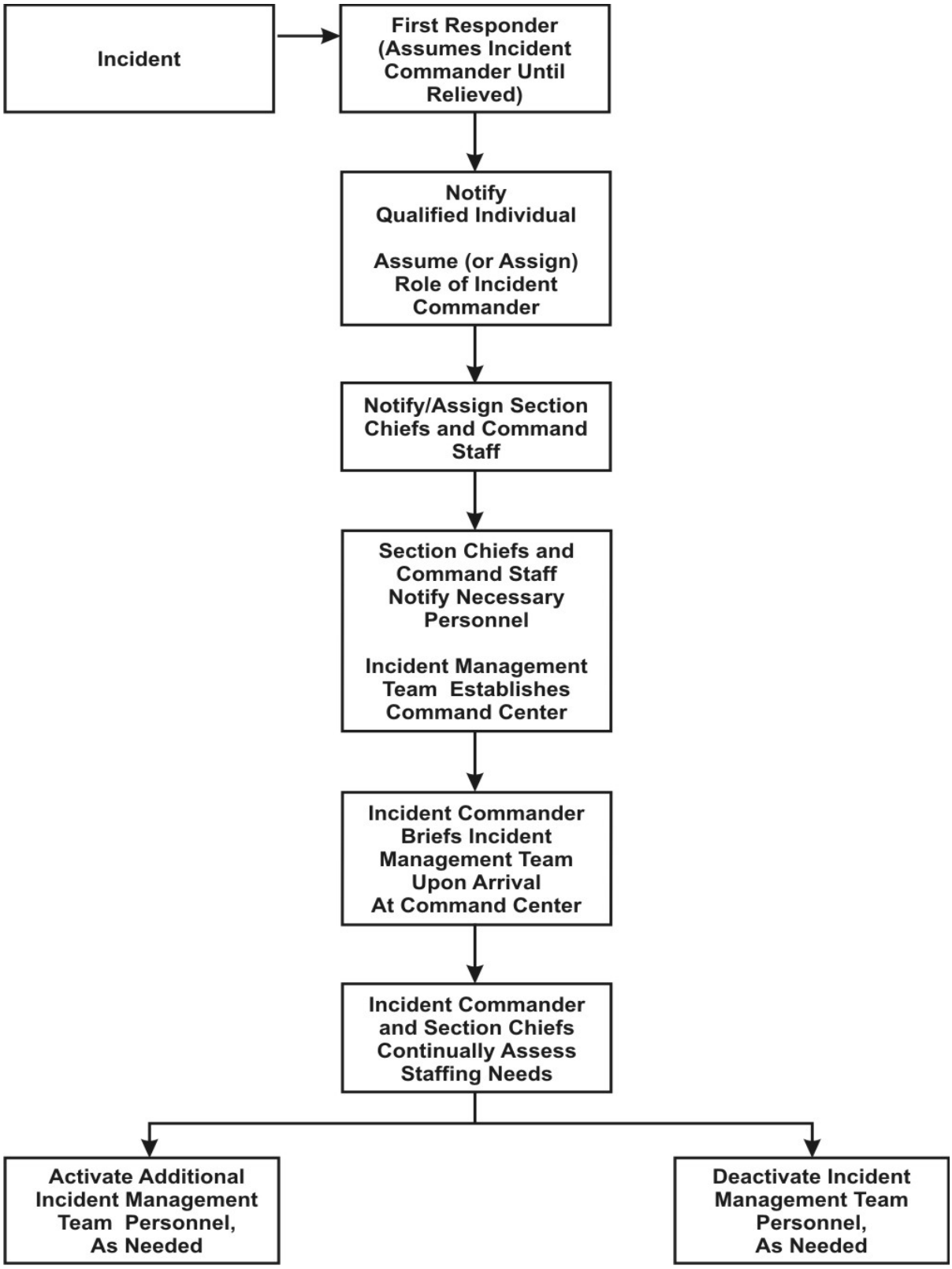
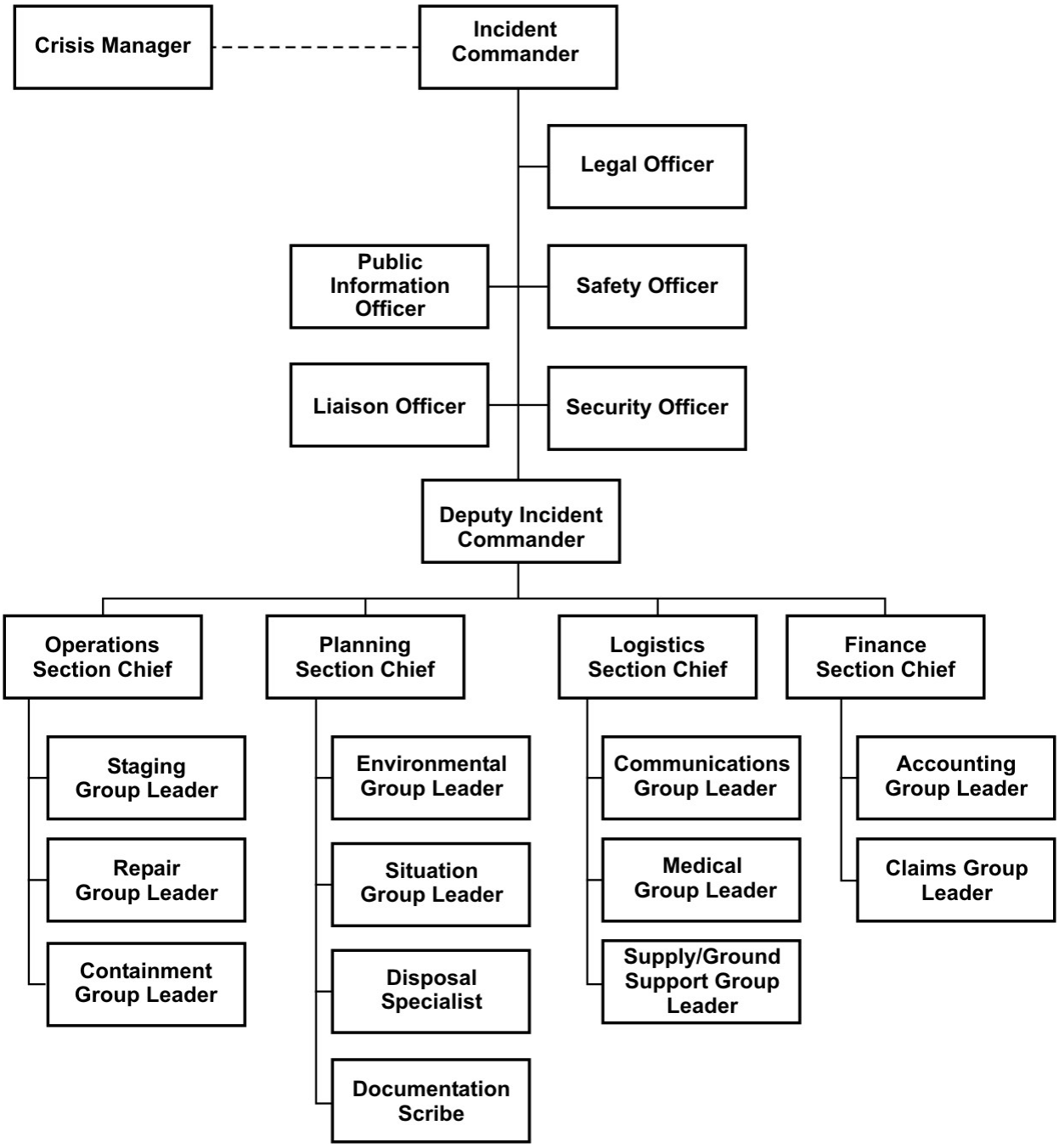


FIGURE 4.5-2 - INCIDENT MANAGEMENT TEAM (IMT) ORGANIZATION CHART



4.6 INCIDENT MANAGEMENT TEAM (IMT) JOB DESCRIPTIONS AND GUIDELINES

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

- Incident Commander
- Deputy Incident Commander

- Crisis Manager
- Public Information Officer
- Liaison Officer
- Legal Officer
- Safety Officer
- Security Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Disposal Specialist
- Situation Group Leader
- Documentation Scribe
- Logistics Section Chief
- Communications Group Leader
- Medical Group Leader
- Supply/Ground Support Group Leader
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader

INCIDENT COMMANDER

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

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

As soon as practical, the Incident Commander shall conduct a critique of the response (**SECTION 8.3**). Participants may include Operations Control personnel, Company supervisors and employees, and outside agencies involved in the response. An Incident Debriefing Form is provided in **SECTION 8.3** to document follow-up actions.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Assess the situation and/or obtain an Incident Briefing from prior Incident Commander.
- ☐ Inform Pipeline Control Center (PCC) to shutdown line, if not already done, leaving

downstream stations running until they go down on low suction.

- ☐ Call Operations Section Chief (Local Area Manager) to dispatch his/her team to close the nearest block valves on both side of the affected area. This team first on site to provide ICS with information and to monitor atmosphere, etc. Ensure Operations Section Chief makes communication with local responders (Fire, Police).
- ☐ Call Safety Officer and dispatch to site.
- ☐ Call IMT leaders (planning, logistics, safety, public affairs) to meet at Incident Command (IC), or assign a location near the incident. Dispatch Public Information Officer to site.
- ☐ Call OSRO and dispatch to staging area to meet with Operations Section Chief; OSRO leader to the IC.
- ☐ Fill IMT positions, if not already done, and brief IMT leaders with current information.
- ☐ Assign a Surveillance / Reconnaissance Officer.
- ☐ Establish contact with field Operations Section Chief and start processing information to the IMT; determine new staging area close to incident, if appropriate. Move IC closer to site (if necessary).

INCIDENT COMMANDER, CONTINUED

Responsibilities, Continued:

- ☐ Determine need for evacuations.
- ☐ Establish communications with Corporate Office- Crisis Manager to help.
- ☐ Establish communications with local, state and federal response agencies- Crisis Manger to help.
- ☐ Ensure that all staff leaders are performing their respective group responsibilities.
- ☐ As agency personnel arrive at the IC, ensure they are incorporated into the unified command structure as appropriate.
- ☐ Approve all press releases developed by the Public Information Officer and Crisis Manager before issued to the media. Make sure a written press statement is developed within one hour of the incident.
- ☐ Provide briefings for incident command staff on a timely basis at regular intervals, or as information changes.
- ☐ Remain focused on the big picture; understand the need for long term resources.

After a couple hours into the response, have staff leaders review the Spill Response Plan (**SECTION 4.6** IMT Job Descriptions) bullet points / checklists to ensure we have covered all responsibilities / actions

DEPUTY INCIDENT COMMANDER

The Deputy Incident Commander is responsible for assisting the Incident Commander in the

development and implementation of strategic and tactical objectives. The Deputy Incident Commander is also responsible for supervising the implementation of the General Plan and Incident Action Plans, conducting planning meetings, and coordinating the activities of response personnel at the spill scene. He/She assumes the responsibility of the Incident Commander in his/her absence.

The Deputy Incident Commander is internally focused on response issues and the coordination of the General Staff and ensures that the Incident Commander is fully apprised of ongoing activities, allowing the Incident Commander to concentrate more on external Issues.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Assess the situation and/or obtain incident briefing from the Incident Commander.
- ☐ Coordinate the implementation of prioritized objectives and strategies established by the Incident Commander/Unified Command with the General Staff.
- ☐ Conduct Incident Briefing Meetings and Planning Meetings as required.
- ☐ Liaise with the Situation Unit Leader to ensure that the Information Center is continuously updated.
- ☐ Ensure that proper communications occur within the General Staff sections.
- ☐ Ensure that Section Chiefs' meeting attendance is coordinated for the smooth conduct of meetings.
- ☐ Ensure that the Incident Commander is kept appraised of any changes during the course of the response, which may affect the strategic and tactical objectives.
- ☐ Ensure that the Incident Action Plan for the next planning period is presented to the Incident Commander and Unified Command for approval on its completion.
- ☐ Ensure that the Span of Control of the General Staff is not exceeded should the incident escalate.
- ☐ Approve the use of trainees, volunteers and auxiliary personnel.

CRISIS MANAGER

The Crisis Manager (CM) is responsible for overseeing of the overall responsibility and for reporting back to Company Management. The Crisis Manager will ensure personnel have the correct property rights to acquire the resources needed for the response. The Crisis Manager will work closely with the IC to be able to maintain an up-to-date picture of the incident and progress made to be able to report back to Company Management. The Crisis Manager will assist the IC when necessary to ensure the practical flow of information both internally and externally.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander.
- ☐ Identify and maintain communications link with Company Management.

- ☐ Provide assistance to Incident Commander when needed.

PUBLIC INFORMATION OFFICER

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

The person designated the position of PIO during the initial response should coordinate with the Koch Companies Public Sector – FHR Public Affairs Incident Response Coordination group to incorporate their capabilities into the Emergency Response during the initial notifications of the incident when anticipating a high level of involvement from the Public, Media, Government, or Koch Business.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Attend briefings and planning meetings from Incident Commander.
- ☐ Establish a single center for Information Officer Operations. This may be called the Joint Information Center (JIC).
- ☐ Arrange for necessary workspace, materials, telephones, and staffing.
- ☐ Prepare Initial Information Summary as soon as possible after arrival.
- ☐ Observe constraints on the release of information imposed by Incident Command.
- ☐ Obtain approval for release of information from Incident Command.
- ☐ Prepare and disseminate news releases.
- ☐ Arrange for meetings between media and appropriate response personnel.
- ☐ Provide escort service and protective clothing to media personnel/VIPs.
- ☐ Respond to special requests for information.
- ☐ Obtain media information that may be useful to incident planning.
- ☐ Resolve conflicting information and bring media concerns to the attention of the Incident Commander.
- ☐ Communicate the needs and concerns of the public to the Incident Commander (IC).

LIAISON OFFICER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC).
- ☐ Participate in planning meetings and briefings.
- ☐ Identify and maintain communications link with agency representatives, assisting, and coordinating agencies.
- ☐ Identify current or potential inter-organizational issues and advise IC as appropriate.
- ☐ Coordinate with Legal Affairs Officer and Public Information Officer (PIO) regarding information and documents released to government agencies.
- ☐ Escort any Agency Representative, present at an incident response site, when access is necessary into designated exclusion zones or facilities with restricted areas.

LEGAL OFFICER

The Legal Officer is responsible for legal matters relative to the incident.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander.
- ☐ Conduct investigations per Incident Commander's request.
- ☐ Communicate to all affected emergency response personnel if work product is declared "Attorney-Client Privilege."
- ☐ Advise Incident Commander and other Command or General Staff on all matters that may involve legal issues.
- ☐ Ensure or provide direction and assistance to Finance Section on issues of procurement or claims.

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).

Important: Safety Officer(s) may exercise emergency authority to stop and prevent unsafe acts.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Incident Commander (IC).

- ☐ Assist in enacting safety goals and objectives.
- ☐ Identify and evaluate safety and health hazards that may impact the responders and public health.
- ☐ Develop, implement, and disseminate SSP with the IC and the Section Chiefs.
- ☐ Designate exclusion zones.
- ☐ Determine or assure appropriate safety equipment is identified and is in use or available as needed for the specific response.
- ☐ Determine or manage the operation and maintenance of safety equipment needed to monitor and evaluate safety and health conditions and prevent unsafe condition for the specific response.
- ☐ Coordinate with Planning Section to ensure decontamination procedures are employed.
- ☐ Coordinate with Section Chiefs for on-scene medical services, as needed.
- ☐ Participate in incident general and IAP meetings.

SECURITY OFFICER

The Security Officer, a member of the Incident Command Staff, is responsible for the determination of the adequacy of physical security. The Security Officer is responsible for taking appropriate actions when improved physical security is required.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC).
- ☐ Participate in planning meetings.
- ☐ Review Incident Action Plans for security implications.
- ☐ Direct, coordinate, and assess effectiveness of security strategies.
- ☐ Modify security strategies as needed.
- ☐ Determine resource requirements.
- ☐ Interact with law enforcement personnel on matters relating to security.
- ☐ In a security incident, isolate the scene for preservation of assets/evidence.

OPERATIONS SECTION CHIEF

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

Responsibilities:

- ☐ Maintain Activity Log.

- ☐ Obtain briefing from Incident Commander (IC) or receive information from the overflight about spill issues.
- ☐ Dispatch site response team (remind each to consider the substance to be Hazardous) and remind each responder our order of priorities:
  - ☐ Safety
  - ☐ Environmental
  - ☐ Business
- ☐ Communicate with the Pipeline Control Center (PCC) to:
  - ☐ Determine what two stations the leak was reported to be between.
  - ☐ Learn what valves the PCCs have closed thus far.
  - ☐ Isolate the segment of pipeline where leak has occurred by closing mainline block valves.
- ☐ Ensure Safety to all workers and the public.
- ☐ Assess the Safety of the Environment by using monitors to detect levels of H2S or other hazardous substances.
- ☐ Contact the following city and county agencies:
  - ☐ Sheriff's Department
  - ☐ Emergency Manager
  - ☐ Police
- ☐ Mitigate the Environmental impact (if necessary, by creating natural earth dikes or if oil has reached the any water, deploying booms to control the spill).
- ☐ Report location, movement and speed of spill to the IC.
- ☐ Work with the Environmental, Health, and Safety Manager to set up the On Site Spill Response Organization (OSRO).
- ☐ Organize the team that will report to the Operations Section Chief:
  - ☐ Staging Group Leader
  - ☐ Repair Group Leader
  - ☐ Containment Group Leader

OPERATIONS SECTION CHIEF, CONTINUED

Responsibilities, Continued:

- ☐ Communicate with the helicopter to learn if any changes have occurred with the spill direction.
- ☐ Report information about special occurrences that may have developed since the initial report to the IC.
- ☐ Work with other responders arriving to the site such as the Incident Management Team and the vacuum truck service.
- ☐ Work with Planning Section Chief to implement the containment plan.
- ☐ Work with Logistics Section Chief to get resources to implement the containment

plan.

- ☐ Make or approve expedient changes to the Incident Action Plans during the execution as necessary.
- ☐ Refer to the Response Plan Book for any missed items.
- ☐ Repair and Restore.

STAGING GROUP LEADER

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

Responsibilities:

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

REPAIR GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Operations Section Chief.
- ☐ Conduct frequent hazard assessments and coordinate safety needs in conjunction

with Operations Section Chief and Safety Officer.

- ☐ Determine source and extent of damage.
- ☐ Obtain necessary materials, personnel, and equipment to repair damage.
- ☐ Plan and execute repairs; periodically advise Operations Section Chief on status of restoration activities.
- ☐ Participate in Operations' planning meetings and briefings.
- ☐ Conduct facility restoration activities in accordance with Company procedures, Site Safety Plan (SSP) and IAP.
- ☐ Participate in development of Repair Plan for the Operations' portion of Incident Action Plan (IAP).
- ☐ Verify that repairs are complete and sound using proven test methods (x-ray, hydrostatic test or other accepted methods) and in compliance with DOT requirements.
- ☐ Supervise completion of repair by the use of proper back-fill materials and techniques.
- ☐ Inform the Incident Commander when pipeline is ready for return to service.
- ☐ Determine and request additional materials, equipment, and personnel as needed.
- ☐ Ensure all equipment is decontaminated prior to being released.

CONTAINMENT GROUP LEADER

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

Responsibilities:

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

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, and develop response and cleanup strategies.

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the IC.
- ☐ Immediately notify Planning Team members, get ETA for each, and begin documenting actions and time.
  - ☐ Environmental Group Leader
    - ☐ EGL will contact
    - ☐ Documentation Unit Leader (_____)
    - ☐ Documentation Scribe (_____)
  - ☐ Engineering Specialist (_____)
  - ☐ Disposal Specialist
- ☐ Travel to IC control room, document arrival time.
  - ☐ Identify IC, Operations Section Chief, Logistics Section Chief
  - ☐ Receive initial briefing from IC
  - ☐ Set up Planning Team staging table away from main IC communication area
- ☐ Review briefing with Planning Team, communicate roles, and review tools checklist.
  - ☐ Assign Environmental Group Leader
  - ☐ Identify Documentation Scribe
  - ☐ Identify Disposal Specialist to Planning Team
  - ☐ Communicate Planning Team members and roles to Documentation Scribe
- ☐ Review potential population/environmentally sensitive area impact if information is not already available from on-site & communicate to Engineering Specialist, Logistics Section Chief, and Documentation Scribe.
- ☐ Supervise preparation of the Incident Action Plan.
- ☐ Update Documentation Scribe as information is available on the Incident Action Plan & relay information from IC to Planning Team.
  - ☐ Provide periodic predictions on incident potential
  - ☐ Update Documentation Scribe with information on release estimate when available
  - ☐ Review Planning Team member's checklists

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

Responsibilities:

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

DISPOSAL SPECIALIST

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Travel to site.
- ☐ Upon arrival at incident staging area, report to Operations Section Chief and receive update.
- ☐ Take appropriate actions as situation may require ASAP. Provide Planning Section Chief or Environmental Group Leader with Disposal Plan and update on on-site conditions that might impact Incident Action Plan.

SITUATION GROUP LEADER

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

Responsibilities:

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

DOCUMENTATION SCRIBE

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Documents all information received from group chiefs and IC on main board and aids in dissemination of information.

Tools Checklists:

- ☐ Alignment maps
- ☐ County road maps
- ☐ Environmental maps
- ☐ Pipe volume calculation cheat sheet
- ☐ Spill Response Plan

LOGISTICS SECTION CHIEF

The Logistics Chief (LC) is responsible for providing vital services, facilities and materials necessary for the response effort. Coordinates transportation, communications, purchasing and support activities.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Incident Commander (IC).
- ☐ Immediately contact EH&S, Security/Medical Group Leader, Supply/Ground Support Group Leader, and Communications Group Leader - provide phone communication required and location to respond to, and receive their ETA.
- ☐ Initial calls prior to travel to vacuum truck company, mechanical contractor, and Company Inspector.
- ☐ Upon arrival to IC Control Room:
  - ☐ Identify IC, Operations Section Chief, and Planning Section Chief
  - ☐ Remember to stay within the Logistics role
  - ☐ Seek out and receive initial briefing from IC
  - ☐ Seek out Planning Section Chief
  - ☐ Set up Logistics location next to Planning lead in the room
- ☐ Tools checklist to be brought to IC Control Room:
  - ☐ Atlas with pipeline drawn in
  - ☐ Spill Response Plan
  - ☐ Pipeline station directions
  - ☐ Sticky note pads
- ☐ Communicate briefing to Logistics team, start organization plan, set staging area and communicate to Section Chiefs.
- ☐ Supply/Ground Support Group Leader and Communications Group Leader start calls for additional Company and outside personnel, along with equipment/material needs, pass on to ETA to our scribe.
- ☐ Ensure EH&S and Security/Medical Group Leader is in vicinity of field site.
- ☐ Supply/Ground Support Group Leader start recording info for Logistics team, pass on to IC scribe.
- ☐ Inspector starts organization of repair equipment needed.
- ☐ Initiate communication toward response strategy/incident action plan with Planning Section Chief.
- ☐ Once drawing on board, Logistics scribe inputs sticky notes to locations where personnel, equipment, and materials will arrive with an ETA.
- ☐ Coordinate personnel and equipment as determined within the Planning Group.
- ☐ Direct updates to IC Scribe.
- ☐ Changing staging area? Immediate communication to IC, Operations and Planning leads.

- ☐ A couple hours into response, reference Spill Response Plan.

COMMUNICATIONS GROUP LEADER

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

Responsibilities:

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

MEDICAL GROUP LEADER

The 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.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Logistics Section Chief.
- ☐ Periodically advise Logistics Section Chief on the status of medical problems.
- ☐ Participate in Logistics meetings and briefings.
- ☐ Participate in development of Logistics' portion of Incident Action Plan (IAP).

- ☐ Determine and develop medical support plan needs.
- ☐ Request medical personnel, as needed.
- ☐ Work with Safety Officer to identify/coordinate local emergency medical services.
- ☐ Coordinate with Safety Officer and Operations Section Chief to establish the Site Safety Plan (SSP) with site boundaries, hazard zones, escape routes, staging areas, Command Center, and Personal Protective Equipment (PPE) requirements.

SUPPLY/GROUND SUPPORT GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Logistics Section Chief.
- ☐ Respond to request for resources or resource information as needed.
- ☐ Periodically advise Logistics Section Chief on status of Supply/Ground Support Group.
- ☐ Participate in Logistics meetings and briefings.
- ☐ Participate in development of Logistics' portion of Incident Action Plan (IAP).
- ☐ Communicate with Staging Group Leader concerning material, equipment, and personnel that are inbound and the approximate time of arrival.
- ☐ Establish a check-in/check-out function as appropriate.
- ☐ Coordinate with other Section Chiefs to ascertain the priority of needed materials, equipment, and services.
- ☐ Advise Section Chiefs of changing situations or conditions in the staging areas.
- ☐ Coordinate with Finance Section Chief to establish accounts, purchase orders, AFEs, and procedures as necessary.
- ☐ Establish an inventory control system for materials and equipment.
- ☐ Maintain roads, when necessary; post signs or instructions for area identification or traffic control.
- ☐ Demobilize and reposition staging areas as needed.

FINANCE SECTION CHIEF

The Finance Section Chief is responsible for accounting, right-of-way, and risk management functions that support the emergency response effort. In this role, the primary responsibility is

supporting the Command Staff and Logistics Section matters pertaining to expenses during and following the emergency response.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC).
- ☐ Participate in Incident Command planning meetings and briefings.
- ☐ Conduct planning meetings and briefings for Finance Section.
- ☐ Participate in preparation of the Incident Action Plan (IAP).
- ☐ Participate in planning meetings.
- ☐ Participate in Unified Command System (UCS) as incident warrants.
- ☐ Request assistance of corporate accounting, right-of-way, or risk management as needed.
- ☐ Assist with contracting administration.
- ☐ Establish a process or activate a Claims Group to accept claim submission as a result of incident.

ACCOUNTING GROUP LEADER

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

Responsibilities:

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

CLAIMS GROUP LEADER

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

Responsibilities:

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

SECTION 5 Last revised: February 2006

INCIDENT PLANNING

SECTION 5 Last revised: January 2005

INCIDENT PLANNING, CONTINUED

5.1 DOCUMENTATION PROCEDURES

Documentation of an emergency response provides a historical record, keeps management informed, serves as a legal instrument, and is a means to account for the cleanup activities.

Documentation should begin immediately upon discovery of incident and continue until termination of operations. Documentation may include the following:

- Description of Incident (origin and characteristics)
- MSDS
- Notifications (external and internal)
- Sampling surveys
- Photographs
- Climatological data
- Labor and equipment accounting
- Copies of logs, contracts, contacts, and plans prepared for incident

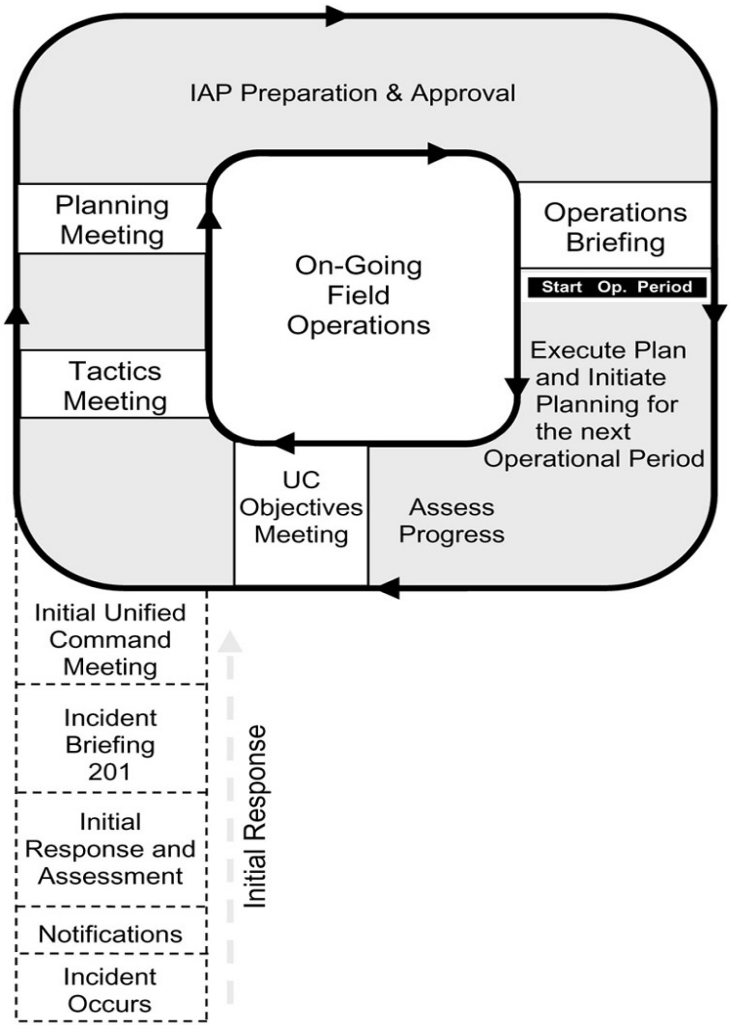
5.2 INCIDENT ACTION PLAN (IAP) PROCESS AND MEETINGS

The period of INITIAL RESPONSE AND ASSESSMENT occurs in most incidents. Short-term responses (small in scope and/or duration, e.g., few resources working one operational period) can often be coordinated by the initial responder utilizing procedures and forms described in this Plan (suggested ICS Form 201, Incident Briefing).

Longer-term, more complex responses, will likely require a dedicated Incident Commander (IC) / Unified Command (UC) who will assign members of the Command and General Staff as needed (e.g., Planning Section Chief (PSC) arranges for transition into the OPERATIONAL PERIOD PLANNING CYCLE). Certain meetings, briefings, and information-gathering during the Cycle lead to the Incident Action Plan (IAP) that guides operations of the next operational period. The IC/UC specifies objectives and the operational periods (e.g., 12-hour shifts, sunrise to sunset, 24-hour shifts, etc.) to engage the cleanup activities.

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

FIGURE 5.2-1 OPERATIONAL PERIOD PLANNING CYCLE



5.2.1 Incident Occurs / Notifications

When an incident occurs, an initial assessment and response actions will begin (**FIGURE 3.1-2**, Incident Report Form). Notifications will be made internally and to the appropriate federal, state, and local agencies (**FIGURE 3.1-5**).

5.2.2 Initial Response and Assessment

INCIDENT BRIEFING

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

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

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

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

5.2.3 Unified Command Objectives Meeting

The IC/UC will review/identify and prioritize objectives for the next operational period (Incident Objectives ICS 202-OS). Objectives from the previous operational period are reviewed and any new objectives are identified.

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

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

5.2.4 Tactics Meeting

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

When: Prior to Planning Meeting
Facilitator: Planning Section Chief
Attendees: Planning Section Chief, Operations Section Chief, Logistics Section Chief, Resources Unit Leader, Situation Unit Leader, and Environmental Unit Leader
Agenda:

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

5.2.5 Planning Meeting

This meeting defines incident objectives, strategies, and tactics and identifies resource needs for the next operational period. This meeting fine-tunes objectives and priorities, identifies and

solves problems, and defines work assignments and responsibilities (suggested ICS Form 215, Operations Planning Worksheet). Meeting preparations include conducting a Tactics Meeting. Displays in the meeting room may include Objectives (ICS 202) for the next period; large sketch maps or charts clearly dated and timed; poster-size Operational Planning Worksheet (ICS 215); current resource inventory prepared by Resources Unit; and current situation status displays prepared by Situation Unit. After the meeting, the Logistics Section Chief prepares the off-incident tactical and logistical resource orders which are used by Planning Section Chief to develop IAP assignment lists (suggested ICS Form 215).

When: After the Tactics Meeting
Facilitator: Planning Section Chief
Attendees: Determined by IC/UC, generally IC/UC, Command Staff, General Staff, Air Operations Section Chief, Resources Unit Leader, Situation Unit Leader, Environmental Unit Leader, and Technical Specialists, as required
Agenda: Primary Responsibility:

5.2.5 Planning Meeting, Continued

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

5.2.6 Incident Action Plan (IAP) Preparation and Approval

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

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

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

Optional Components (use as pertinent):

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

5.2.7 Operations Briefing

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

When: About an hour prior to each shift
Facilitator: Planning Section Chief
Attendees: IC/UC, Command Staff, General Staff, Branch Directors, Division/Group Supervisors, Task Force/Strike Team Leaders (if possible), Unit Leaders, others as appropriate

Agenda:		Responsible to Present
1.	Review of IC/UC Objectives, changes to IAP.	[Planning Section Chief]
2.	Current response actions and last shift's accomplishments.	[Operations Section Chief]
3.	Weather and sea conditions forecast.	[Situation Unit Leader]
4.	Division/Group and Air Operations assignment.	[Operations Section Chief]
5.	Trajectory analysis.	[Situation Unit Leader]
6.	Transport, communications, supply updates.	[Logistics Section Chief]
7.	Safety message.	[Safety Officer]
8.	Financial report (e.g. Claims Number set-up).	[Finance/Administration Section Chief]
9.	News Media report.	[Information Officer]

10.	Assisting/cooperating organization/agency reports of concern.	[Liaison Officer]
11.	Incident Action Plan endorsement and motivational remarks.	[IC/UC]

5.2.8 Assess Progress

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

SPECIAL PURPOSE MEETINGS

5.2.9 Initial Unified Command Meeting

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

5.2.9 Initial Unified Command Meeting, Continued

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

Agenda:

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

5.2.10 Command Staff Meeting

The purpose of this meeting is to coordinate Command Staff functions responsibilities, and objectives. It is scheduled as necessary by the IC/UC. Command Staff (IC/UC, Safety Officer, Liaison Officer, and the Information Officer) attend.

5.2.11 Command and General Staff Breakfast/Supper

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

5.2.12 Business Management Meeting

This meeting is for participants to develop and update the Crisis Manager on the status, progress, and forecast of the IAP. The agenda could include: finance requirements and criteria imposed by contributing organizations, business operating plan for resource procurement and incident funding, cost analysis, and financial summary data. Attendees include: Incident Commander, Operations, Planning, Logistics, and Finance/Administration Section Chiefs, Cost Unit Leader, Supply Unit Leader, Situation Unit Leader, Environmental Unit Leader, and Demobilization Unit Leader. This meeting is generally conducted outside of the ICS Structure allowing exchange of information between Company Management Liaison (Crisis Manager) and the Response effort. It is suggested this meeting is held before the ICS PLANNING MEETING.

5.2.13 Agency Representative Meeting

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

5.2.14 News Briefing

Refer to **SECTION 7.2** for Public Affairs information and policies.

5.3 ICS FORMS

ICS Forms are available electronically via this Plan's Forms Navigator.

Note: These forms are alternate or suggested forms to be used as appropriate.

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

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

- INCIDENT ACTION PLAN

  For use by the Planning Section to plan each day's response actions. This plan consists of the portions identified on the IAP cover page and needs to be approved by the Incident Commander, Federal On-Scene Coordinator (FOSC), and State On-Scene Coordinator (SOSC).

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

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

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

- INCIDENT OBJECTIVES - ICS 202

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

- **ORGANIZATION ASSIGNMENT LIST - ICS 203**

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

- ASSIGNMENT LIST - ICS 204

  Submits assignments at the Division/Group level.

- COMMUNICATIONS PLAN - ICS 205

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

- MEDICAL PLAN - ICS 206

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

5.3 ICS FORMS, CONTINUED

ICS Forms are available electronically via this Plan's Forms Navigator.

Note: These forms are alternate or suggested forms to be used as appropriate.

- **INCIDENT STATUS SUMMARY - ICS 209**

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

- **UNIT LOG - ICS 214**

  Used to log activities for an entire unit.

- **INDIVIDUAL LOG - ICS 214a**

  Used to log activities for an individual.

5.3.1 Incident Briefing ICS 201-OS

1. Incident Name	2. Prepared By: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS
3. Map/Sketch (Include maps drawn here or attached, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines or other graphics depicting situational and response status)		
INCIDENT BRIEFING	March, 2000	ICS 201-OS (pg 1 of 4)

5.3.1 Incident Briefing ICS 201-OS, Continued

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

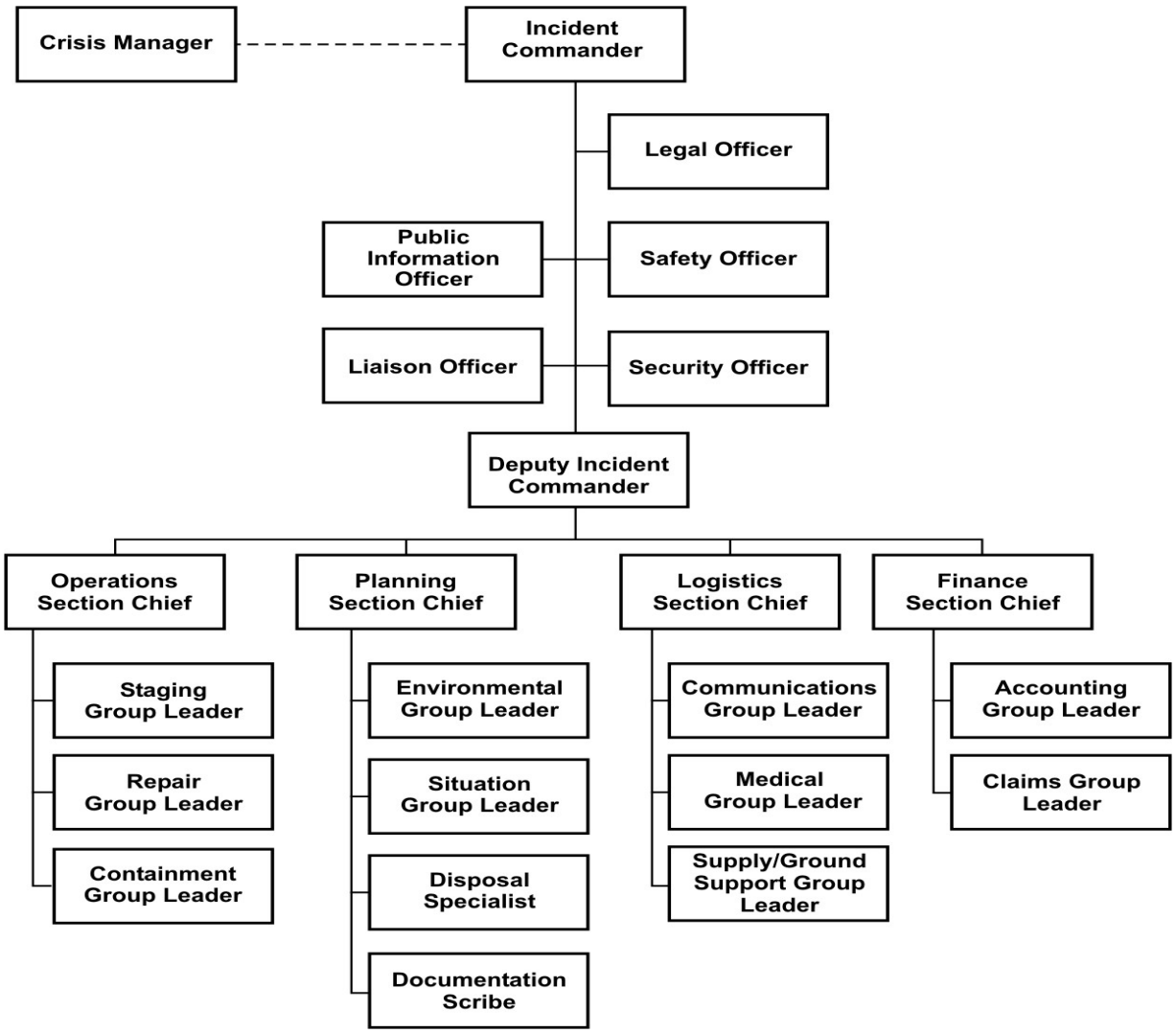
Time	Action/Note

INCIDENT BRIEFING	March, 2000	ICS 201-OS (pg 2 of 4)

5.3.1 Incident Briefing ICS 201-OS, Continued

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

6. Current Organization



INCIDENT BRIEFING	March, 2000	ICS 201-OS (pg 3 of 4)

5.3.1 Incident Briefing ICS 201-OS, Continued

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

7. Resources Summary

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

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

5.3.2 Incident Action Plan (IAP) Cover Sheet

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

3. Approved by:

FOSC

SOSC

IC

INCIDENT ACTION PLAN

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

- ☐ ICS 202-OS (Incident Objectives)
- ☐ ICS 203-OS (Organization Assignment List)
- ☐ ICS 204-OS (Assignment List)
- ☐ ICS 205-OS (Communications Plan)
- ☐ ICS 206-OS (Medical Plan)
- ☐ ICS 209-OS (Incident Status Summary)
- ☐ ICS 214-OS (Unit Log)
- ☐ ICS 214a-OS (Individual Log)
- ☐
- ☐

4. Prepared By: (Planning Section Chief)	**Date/Time:**
IAP COVER SHEET	March, 2000

5.3.3 Incident Objectives ICS 202-OS

1. Incident Name	2. Operational Period (Date/Time) From: To:	INCIDENT OBJECTIVES ICS 202-OS
3. Overall Incident Objective(s)		
4. Objectives for Specified Operational Period		
5. Safety Message for Specified Operational Period Approved Site Safety Plan Located at:		
6. Weather: See Attached Weather Sheet		
7. Tides/Currents: See Attached Tide/Current Data		
8. Time of Sunrise:	**Time of Sunset:**	

9. Attachments (check if attached)

☐ Organization List (ICS 203-OS) ☐ Assignment List (ICS 204-OS) ☐ Communications Plan (ICS 205-OS)

☐ Medical Plan (ICS 206-OS) ☐ Weather

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

INCIDENT OBJECTIVES	March, 2000	ICS 202-OS

5.3.4 Organization Assignment List ICS 203-OS

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

3. Incident Commander and Staff

	Primary	Deputy
Federal:		
State:		
IC:		

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	
Time Unit	
Procurement Unit	
Compensation Unit	
Cost Unit	

7. Operations 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		

a. Support Branch		Helicopter Coordinator	
Director		Fixed-wing Coordinator	
Supply Unit		8. Finance Section	
Facilities Unit		Chief	
Transportation Unit		Deputy	
Vessel Support Unit		Time Unit	
Ground Support Unit		Procurement Unit	
b. Service Branch		Compensation Unit	
Director		Cost Unit	
Communications Unit			
Medical Unit			
Food Unit			

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

5.3.5 Assignment List ICS 204-OS

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/Croup Supervisor:			

6. Resources Assigned This Period	"X" indicates 204a attachment with special instructions			
Strike Team/Task Force/ Resource Identifier	**Leader**	**Contact Info. #**	**# of Persons**	**Notes/Remarks**

7. Assignments

8. Special Instruction for Division/Group

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

Name/Function	Radio: Freq./System/ Channel	Phone	Pager
Emergency Communications			
Medical	Evacuation	Other	

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

ASSIGNMENT LIST June, 2000 ICS 204-OS

5.3.6 Communications Plan ICS 205-OS

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

3. Basic Radio Channel Use

SYSTEM/CACHE	CHANNEL	FUNCTION	FREQUENCY	ASSIGNMENT	REMARKS

4. Prepared By (Communications Unit)	Date/Time

COMMUNICATIONS PLAN	March, 2000	ICS 205-OS

5.3.7 Medical Plan ICS 206-OS

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

5.3.8 Incident Status Summary ICS 209-OS

1. Incident Name	2. Period Covered By Report From: To:	Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS

3. Spill Status (Estimated, in Barrels)		[OPS/EUL/SSC]	
Source Status:	Remaining Potential (bbl):		
	Rate of Spillage (bbl/hr):		
Secured	☐	Unsecured	☐

	Since Last Report	Total
Volume Spilled		
Mass Balance/Oil Budget		
Recovered Oil		

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.				

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

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)	Date/Time

INCIDENT STATUS SUMMARY	March, 2000	ICS 209-OS

5.3.9 Unit Log ICS 214-OS

1. Incident Name	2. Operational Period (Date / Time) From: To:	UNIT LOG ICS 214-OS
3. Unit Name	4. Unit Leader (Name and ICS Position)	

5. Personnel Assigned

Name	ICS Position	Home Base

6. Activity Log (Continue on Reverse)

Time	Major events

7. Prepared by:	Date / Time

UNIT LOG	June 2000	ICS 214-OS

5.3.9 Unit Log ICS 214-OS, Continued

1. Incident Name	2. Operational Period (Date / Time) From: To:	UNIT LOG(Cont) ICS 214-OS
3. Unit Name	4. Unit Leader (Name and ICS Position)	

5. Personnel Assigned

Name	ICS Position	Home Base

6. Activity Log (Continue on Reverse)

Time	Major events

7. Prepared by:	Date / Time

UNIT LOG	June 2000	ICS 214-OS

5.3.10 Individual Log ICS 214a-OS

1. Incident Name	2. Operational Period (Date / Time) From: To:	INDIVIDUAL LOG **ICS 214a-OS**

3. Individual Name	**4. ICS Section**	**5. Assignment / Location**

6. Activity Log	Page	of

TIME	MAJOR EVENTS

7. Prepared by:	**Date / Time**

		ICS

INDIVIDUAL LOG	June 2000	214a-OS

5.4 SITE SAFETY AND HEALTH PLAN

5.4.1 Safety Introduction and Overview

Responding to spills and other emergencies involving products can be very hazardous if not safely managed. Two critical areas deserving special attention are **Prevention of Accidental Ignition** and **Personnel Safety**. The following safety considerations shall be followed:

Prevention of Accidental Ignition

- Work upwind of the spilled liquid as much as possible.
- Monitor LEL with appropriate air monitoring device and frequency.
- Complete air monitor logs for proper documentation as monitoring continues.
- Utilize EH&S Work Permit during the Incident (including appropriate logs and attachments, etc.)
- Use non-sparking tools in areas where vapors are present.
- Isolate the public and press from the immediate area. They are not trained in the necessary safety precautions to function in this environment. The press utilizes equipment that is not approved for explosive atmospheres.

Personnel Safety

- Utilize the appropriate air monitoring equipment to protect yourselves from the vapors or fumes of petroleum products and crude oils. High concentrations of these vapors may be toxic and can be an asphyxiate.
- Work using the "buddy system" (that is, two people working as a team).
- Use respiration equipment (APRs or SCABA) and other applicable PPE when necessary.

The Site Safety Plan provides a comprehensive framework for initiating and maintaining quality safety practices at the scene of an emergency. The Safety Manager is responsible for promoting a safe and healthy environment for personnel involved in incident response. The following Site Safety Plan is designed to provide a consistent, comprehensive process to meet this objective.

For small, minor spills, the Safety Plan may consist of a EH&S Work Permit and the Safety Plan Checklist or equivalent company Work Permit.

5.4.2 Initial Site Safety and Health Plan

SAFETY PLAN CHECKLIST

ASSIGN SITE SAFETY RESPONSIBILITY
Name:
ESTABLISH PERIMETER AND RESTRICT ACCESS (Compile sketch as necessary)
CHARACTERIZE SITE HAZARDS

• Identify pollutant:
• Obtain Material Safety Data Sheets
• Conduct air monitoring as necessary:
• Identify physical and biological hazards, i.e.: slips, trips, falls, confined spaces, noise, weather conditions, poisonous insects, reptiles, plants, and biological waste:
ESTABLISH CONTROL ZONES
• Exclusion zone:
• Contamination reduction zone:
• Support zone:
ASSESS TRAINING REQUIREMENTS
• Ensure only authorized persons are allowed access
UTILIZE EH&S SAFE WORK PERMITS AS INITIAL SITE SAFETY PLAN
• Ensure safety briefings
• Select Personal Protective Equipment
• Level A, B, C, or D:
ESTABLISH DECONTAMINATION STATION(S)
ESTABLISH EMERGENCY MEDICAL PLAN
• Locate hospital, EMT, and first aid stations:
• List emergency numbers:
Fire:
Police:
Ambulance:
For other spills of significance, the Site Safety Plan is designed to meet the Safety Objectives.

5.4.3 Site Safety and Health Plan

Incident Name:	
Date:	Site Safety Officer:
Scope	

This Site Safety Plan is for use on the specified above incident and response to a spill of _____ estimated to be approximately _____ in volume. This incident is being managed by designated Company personnel integrated with on-site Federal, State, and/or Local response representatives along with the use of commercial HAZWOPER-accepted qualified contractors. This plan is based on the regulations and recommendations of Federal Agencies such as OSHA, EPA, DOT, and USCG and the Company. Company personnel or contractors will be on site to address safety concerns, site safety plans, conduct Industrial Hygiene monitoring, and for special assistance; however, the day-to-day safe operation of the site and project is the responsibility of trained site supervisors. Every site employee shall comply with provisions of this plan and focus constant attention on preventing loss or damage to any person, property, process, or the environment.
Site Description
Location:
This incident is at _____, in the state of _____, and in the vicinity of _____. The Command Post is currently located at _____. The Incident Base and Staging Area are located at _____.

5.4.3 Site Safety and Health Plan, Continued

On-Site Control Boundaries:	**Marking:**
Exclusion Zone - Hotline	As designated by:
Contamination Reduction Zone	As designated by:
Support Zone	As designated by:
Hazards:	
Area Affected:	
The area is _____and is identified as the Hot Zone.	
Surrounding Population:	
Topography:	

Weather Conditions:
The weather is _____, temp. is _____, and there is a _____ % chance of precipitation. The prevailing wind is from the _____ at _____ mph throughout the day.
Environmental and Archeological Concerns:
Initial Entry Objectives:

5.4.3 Site Safety and Health Plan, Continued

Additional Information:
Identified sources of ignition within or adjacent to the spill or contained liquid will be shut down, secured, isolated or monitored, as appropriate. Electrical equipment shall be in compliance with regulatory requirements. Note: Smoking is not allowed on Company property.
Site Access
Personnel shall notify the Site Safety Officer or designee prior to entering or leaving the site. _____ has been designated to control access. A sign-in log will be maintained at the incident base. Persons entering the area shall sign in/out. Entry into spill area will be by trained personnel only. Training documentation shall be provided to the Site Safety Officer prior to entry.
Hazard Evaluation
Chemical Hazards:
The following substance is known to be at the Spill site.

Substance:	**Primary Hazard:**
☐ Crude Oil	Flammable/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Gasoline	Flammable/Slightly Toxic/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Diesel Fuel	Flammable/Slightly Toxic/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Jet Fuel	Flammable/Moderately Toxic/Skin, Eye, Nose, Throat, & Lung Irritant

☐ Additive	Flammable/Slightly-Moderately Toxic/Skin, Eye, Nose, Throat, and Lung Irritant
☐ Butane	Flammable/Asphyxiant/Prolonged contact may cause frostbite
☐ Kerosene	Flammable/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Propane	Flammable/Asphyxiant/Prolonged contact may cause frostbite/Explosive mixtures with air
☐ Benzene	Flammable/Skin and Eye Irritant/May be toxic if inhaled or ingested
☐ Hydrogen	Flammable gas/Asphyxiant/Colorless and odorless
☐ Toluene	Flammable/Skin and Eye Irritant/may be toxic if inhaled or ingested
☐ Xylene	Flammable/Skin and Eye Irritant/may be toxic if inhaled or ingested
☐ Natural Gas	Flammable gas/Asphyxiant/Colorless and odorless
☐ Fuel Gas	Flammable/Poisonous Gas/Skin and Eye Irritant/Prolonged contact may cause frostbite/Harmful or fatal is swallowed

5.4.3 Site Safety and Health Plan, Continued

Material Safety Data Sheets
Material Safety Data Sheets for Company Products are located on the company intranet. Employees involved in an emergency response are trained to read Company MSDS and to know where they are located. MSDS for material released/spilled during this incident can be found at the following locations:

Personal Protective Equipment		
The following Personal Protective Equipment (PPE) shall be required for entry into the Spill Area during the cleanup process.		
Level B	Level C	Level D
1. Hard Hat 2. Self Contained Breathing Apparatus 3. Latex inner gloves, Neoprene outer gloves 4. Flame retardant clothing, such as Nomex suits, with cuffs and pant legs duct tape sealed 5. Radios will be provided to the entry team, backup team, and command staff. These radios shall be intrinsically safe and	1. Hard Hat 2. Safety glasses with side shields, splash goggles, or safety glasses with full face shield 3. Neoprene gloves 4. Tyvek disposable suit with cuffs and pant legs duct tape sealed 5. If monitoring results indicate the continued need for respiratory protection, SCABAs or SARs may be used. If a half mask or a full face respirator is allowed, it	1. Hard Hat 2. Safety Glasses 3. Long sleeved shirt - tank tops will not be allowed 4. Long legged pants or overalls - shorts will not be allowed 5. Hand protection as needed 6. Additional items as required by Safety Officer

tested prior to entry	must be NIOSH-approved and use the correct type of cartridge	

5.4.3 Site Safety and Health Plan, Continued

Decontamination
A Decon Site Layout (**SECTION 5.5**) shall be used to construct the Decon area. Personnel involved in the response and entering the Hot Zone area shall be trained and equipped to meet the requirements of Emergency Response. Decon Site(s) should be constructed at the point of entry to the Hot Zone. Multiple Decon Sites may be necessary for multiple cleanup areas or when an area has multiple entry points.
Communications
Only intrinsically safe electronic devices will be allowed within the Hot Zone. Verbal and hand signal communication is allowed in the Hot Zone. Cellular phones, pagers, lamps, or flare devices shall not be allowed into Hot Zone unless intrinsically safe and approved by the Safety Office or designee. Other non-sparking methods which cannot produce ignition may be allowed in the Hot Zone, but must be approved by the Safety Officer. Cellular phones, pagers, stationary telephones, and any other communication devices shall be allowed by the Safety Officer into other support areas of the incident.
Personal Identification
As available, Incident Command position personnel shall wear vests with the position label on the vest (Incident Commander, Planning, Logistics, Operations, Safety, etc.) If vests are not available, the IC personnel shall ensure they are recognized by personnel they are supervising.
First Aid
First aid kits are located at _____. Serious injuries will be treated by 911 EMS response systems as needed. Injuries, no matter how slight, shall be reported to a Safety Officer immediately.

5.4.3 Site Safety and Health Plan, Continued

Emergency Eye Wash Station:
Portable emergency eyewash stations are located at _____.
Potable Water:
Potable water is available at _____.

Toilet Facilities:
Toilet facilities are available at _____.
Air Monitoring:
Air monitoring shall be conducted by _____, who will utilize _____ to monitor the levels of _____. Other sampling devices or media must be approved by the Safety Officer prior to being allowed into the area. A log sheet shall be maintained for gas monitoring data to be logged on _____ minute interval. Readings shall be collected from the perimeter of the cleanup area on a _____ interval. Air monitoring shall continue until the Safety Officer determines that it is no longer necessary.

5.4.3 Site Safety and Health Plan, Continued

Additional Health/Hygiene Sampling
Additional testing of atmosphere, personnel, or equipment may be conducted at the discretion of the Safety Officer or Incident Commander.
Emergency Procedures
The following standard emergency procedures will be used by the on-site personnel. The Incident Commander, Operations Chief, and Safety Supervisor shall be made aware of any on-site emergencies and be responsible for ensuring that the appropriate procedures are followed: **Injury/Illness in the area:** An injury or illness occurring in the response area shall be immediately communicated through the Command Staff to the Safety Officer in order that it may be responded to in the degree necessary. This includes everything from minor first aid treatment to the more serious injuries involving the 911 EMS system. A medical emergency shall receive immediate attention and appropriate response. Company notification by the on-site personnel shall be in the following order until contact is made with one of the following: the Site Safety Officer, Operations Section Chief, Incident Commander, or Operations Manager.
911 EMS Response Service:
Refer to **SECTION 3** for the appropriate notifications.
Personal Protective Equipment Failure:
If worker experiences a failure or alteration of protective equipment that affects the protection factor, that person shall immediately evacuate to a safe area. Decon procedures shall be followed. The Safety Officer shall be notified immediately. Return to the area shall not be permitted until the equipment has been properly and effectively repaired or replaced.

Other Equipment Failure:		
If other equipment fails to operate properly, the Operations Chief shall be notified and then determine the effect of this failure on continuing the operations. If the failure affects the safety of personnel or prevents completion of the planned tasks, personnel shall leave the area until the situation is corrected.		
Plan Prepared By:		
Safety Officer:		
Printed Name	Signature	Date
Plan Reviewed By:		
Operations Chief:		
Printed Name	Signature	Date
Plan Approved By:		
Incident Commander:		
Printed Name	Signature	Date

5.5 DECONTAMINATION PLAN

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

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

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

  Crews are available to assist in decontamination procedures as needed. The crews shall 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 zones or where otherwise designated. Decontamination stations are to be equipped and manned to assist personnel leaving a contaminated zone to remove, package, and label soiled or

contaminated response equipment, thus preventing the spread of contaminants.

5.5 DECONTAMINATION PLAN, CONTINUED

Listed below are recommended stations for a Decontamination Plan. Note: Not all of these stations may be necessary. The actual type and number of stations will be decided by the Decontamination Group in conjunction with the Safety Officer based on the type of material released and the hazards of the material.

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 a scrub brush and decontamination solution.
STATION 8	Suit, boot and glove rinse	Rinse off decontamination solution using water. Repeat as many times as necessary.
STATION 9	Canister or mask change	If worker leaves exclusion zone to change canister or this is the last step in the decontamination procedure, worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, and the worker returns to duty.
STATION 10	Safety boot removal	Remove safety boots and deposit in container with plastic liner.
STATION 11	Suit removal	With assistance of helper, remove outer suit (Tyvek suits). 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

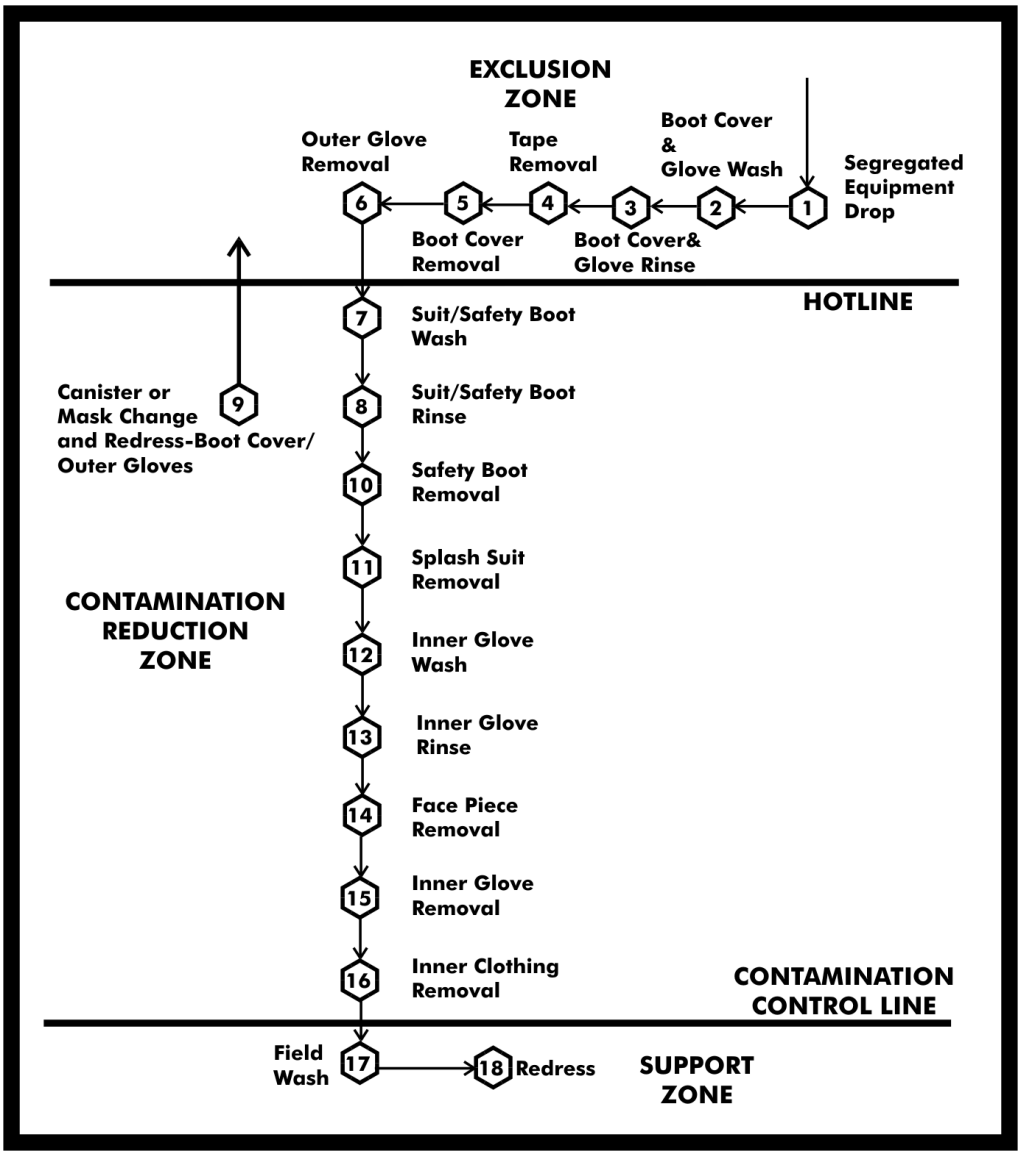
		plastic liner. Avoid touching face with fingers.
STATION 15	Inner glove removal	Remove inner gloves and deposit in lined container.

5.5 DECONTAMINATION PLAN, CONTINUED

MAXIMUM MEASURES FOR DECONTAMINATION, CONTINUED		
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	If highly toxic, skin-corrosive, or skin-absorbable materials are known or suspected to be present, work with safety; an on-site shower may be necessary. Wash hands and face if shower is not available.
STATION 18	Re-dress	Put on clean clothes. Exit point of the Decontamination Site.

5.5 DECONTAMINATION PLAN, CONTINUED

DECONTAMINATION PROCEDURES, MAXIMUM DECONTAMINATION LAYOUT



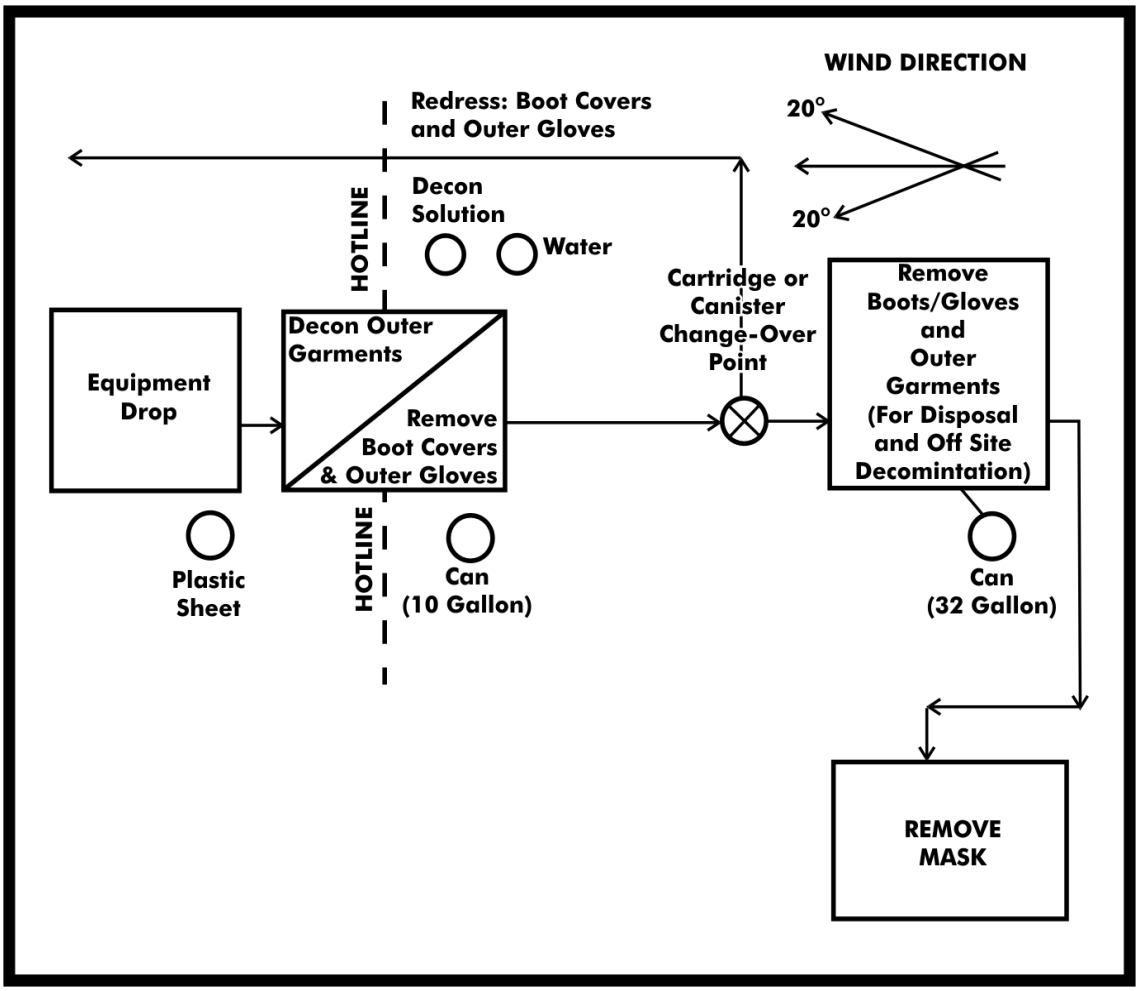
5.5 DECONTAMINATION PLAN, CONTINUED

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

	change	(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, and 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. Exit point of the Decontamination Site.

5.5 DECONTAMINATION PLAN, CONTINUED

DECONTAMINATION PROCEDURES, MINIMUM DECONTAMINATION LAYOUT



5.6 DISPOSAL PLAN

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

Disposal priorities:

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

Disposal options:

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

Resources required for disposal options:

General information:

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

5.6 DISPOSAL PLAN, CONTINUED

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

PPE required for waste handling:	
Waste coordinator:	Date:

Resources required for disposal options:

Incident name:	
Sample number:	Date sent:
Source of sample:	
Date sample data received:	
Waste hazardous:	Non-hazardous:
Permits/variances requested:	
Approval received on waste profile:	
Date disposal can begin:	
Disposal facilities:	
Profile number:	
Storage contractors:	
Waste transporters:	

PPE designated and agrees with Site Safety and Health Plan:

5.6 DISPOSAL PLAN, CONTINUED

Additional information:
Waste coordinator:

5.7 INCIDENT SECURITY PLAN

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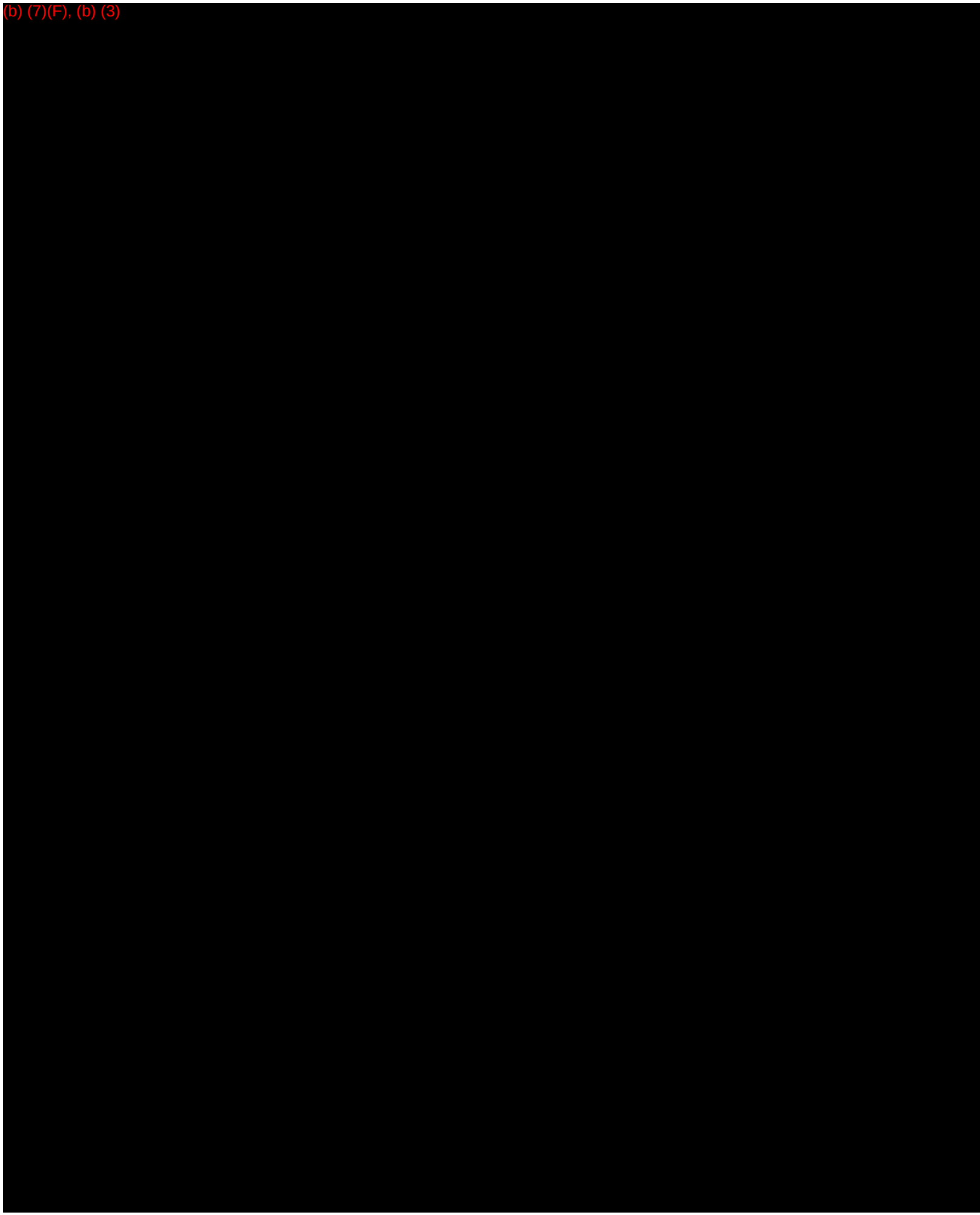
(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

5.8 DEMOBILIZATION PLAN

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

Demobilization procedures:

- Each incident will require a Decontamination Area or designate where larger equipment may be sent for decontamination
- Operations Section will send resources not in use at a specific collection site to a designated decontamination sites for re-assignment or release
- Decontaminated equipment will be returned to appropriate staging area for release or re-deployment at other locations
- Long term information maintained by the Planning and Operations Section Chiefs may be utilized to assist in the prioritization of releasing equipment versus placing it on stand-by
- Each Planning Section (Decontamination Site, Staging Area, and Logistics) will document the demobilization, decontamination, re-deployment, or release of equipment at each stage
- The Staging Group Leader will provide Demobilization Plan detailing re-deployment strategies on equipment, plus priorities on demobilization and release recommendations for equipment at the staging areas
- The Demobilization Plan is to be incorporated into the Incident Action Plan (IAP) for ICS Approval. As assigned by the Demobilization Plan within the IAP, equipment designated for re-assignment will be mobilized to the appropriate staging area
- The Operations Section will ensure that re-deployed personnel receive proper rest prior to returning to duty
- The Planning Section Chief will monitor personnel re-deployment activities to ensure number of hours worked is within acceptable guidelines
- Staging Group Leader will release equipment designated for release. Transports may be required for equipment if in remote staging area

- Once equipment is released and removed from staging areas, Logistics and the Finance Unit shall be informed to ensure invoicing reflects the dates released

SECTION 6 Last revised: February 2006

SENSITIVE AREAS / RESPONSE TACTICS

6.1 AREA DESCRIPTION

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

Sensitivity maps are provided in **SECTION 6.10**.

6.2 SPILL CONTAINMENT / RECOVERY

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

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

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

For terrestrial spills, trenches, 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. Forming collection ponds for containing free product may be considered when attempting to recover free oil. Absorbents such as hay, straw, dry dirt or sand, and other commercial products (such as peat moss) may be considered as alternative methods of containment.

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

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

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

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

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

Sorbent booming

- Used only on quiet water with minor oil contamination
- Boom is anchored along a shoreline or small areas of surface water (e.g. ponds, rivers, and creeks) and may be used in a manner which allows boom to work with the fluctuating water currents
- May use boom made of sorbent material or may pack sorbent material between multiple booms placed parallel to each other

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

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

FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY

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

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

			sediments during the cleanup effort • Passive efforts, such as sorbent boom can be used to retain oil as it is naturally removed

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

Swamp	• Swamps are freshwater wetlands having varying water depths with vegetation types ranging from shrubs and scrubs to poorly drained forested wetlands. Major vegetative types include: scrubs, shrubs, evergreen trees, and hardwood	• 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,	• No cleanup recommended under light conditions • Under moderate to heavy accumulations, to prevent chronic oil pollution of surrounding areas placement of sorbent along fringe swamp forest (to absorb oil as it is slowly released) may be effective under close scientific supervision

	forested woodlands • Birds and mammals use swamps during feeding and breeding activities	the roots of swamp forest trees are not exposed; thus, little damage to trees is expected. Any underbrush vegetation, however, would be severely impacted	• Proper strategic boom placement may be highly effective in trapping large quantities of oil, thus reducing oil impact to interior swamp forests • Oil trapped by boom can be reclaimed through the use of skimmers and vacuums

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

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY
Salt and Brackish Water Marshes	• Marshes are intertidal wetlands containing emergent, herbaceous vegetation. • Width of the marsh can vary widely, from a narrow fringe to extensive areas. • They are relatively sheltered from waves and strong currents. • Sediments are composed of organic muds except on the margins of barrier islands where sand is abundant. • Resident flora and fauna are abundant, with numerous species with high utilization by birds.	• Oil adheres readily to marsh vegetation. • The band of coating will vary widely, depending upon the water level at the time oil slicks are in the vegetation. There may be multiple bands. • Large slicks will persist through multiple water-level changes and coat the entire stem from the high-water line to the base. • If the vegetation is thick, heavy oil coating will be restricted to the outer fringe, although lighter oils can penetrate deeper, to the limit of inundation. • Medium to heavy oils do not readily adhere to or penetrate the fine	• Under light oiling, the best practice is to let the area recover naturally. • Heavy accumulations of pooled oil can be removed by vacuum, sorbents, or low-pressure flushing. During flushing, care must be taken to prevent transporting oil to sensitive areas down slope or along shore. • Cleanup activities should be carefully supervised to avoid vegetation damage. • Any cleanup activity must not mix the oil deeper into the sediments. Trampling of the roots must be minimized. • Cutting of oiled vegetation should only be considered when other resources are at great risk from leaving oiled

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

	may include wet meadows and marshes		spills • Cleanup options include physical herding, sorbents, and debris/vegetation removal

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

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

6.3 SENSITIVE AREA PROTECTION

Protection refers to the implementation of techniques or methods to prevent oil from making contact with an area that is determined to be sensitive for aquatic, environmental, economic, cultural, or human use reasons. Implementation of sensitive area protection techniques should consider a number of factors such as sensitive features, priorities for areas to be protected, and potential degree of impact. In the event a product spill reaches a major area waterway, it may be necessary to protect downstream sensitive areas if it appears that local containment and recovery efforts will not be sufficient to control the entire spill. Major waterways and specific sensitive areas located downstream of the Facility are provided in SECTION 6.7.

FIGURE 6.3-1 - SENSITIVE AREA PROTECTION IMPLEMENT SEQUENCE

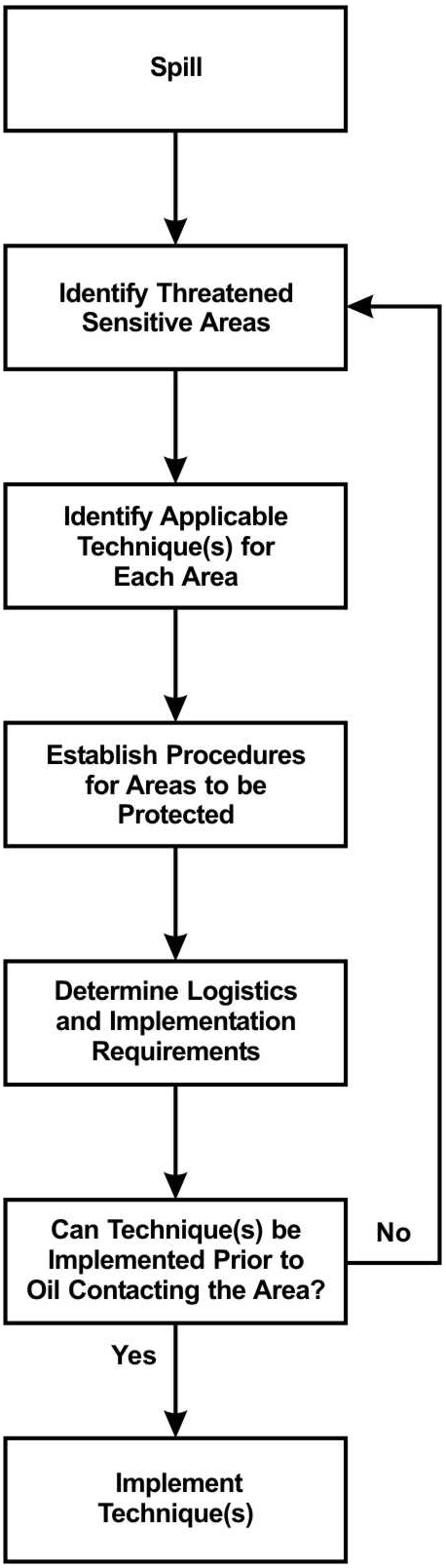

FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP TECHNIQUES

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL

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

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

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

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
Washing, Continued				
6. Flushing	Water streams at low to moderate pressure, and possibly elevated temperatures, are used to remove	Equipment 1-5 50- to 100-gpm/100-psi pumping systems with manifold 1-4 100-ft hoses	• Substrates, riprap, and solid man-made structures • Oil stranded	• Can impact clean downgradient areas • Will displace many surface

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

	sediments to maximize natural degradation processes.	workers	gravel beaches with subsurface oil • Where sediment is stained or lightly oiled • Were oil is stranded above normal high waterline	sediments and organisms

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

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

	burned to minimize material handling and disposal requirements. Material should be stacked in tall piles and fans used to ensure a hot, clean burn.	1 supply of combustion promoter Personnel 2-4 workers	substrates where heat may impact the biological productivity of the habitat • Where heavily oiled items are difficult or impossible to move • Many potential applications on ice	• Substantial smoke may be generated • Heat may impact adjacent vegetation
12. Natural Recovery	No action is taken and oil is allowed to degrade naturally.	None required	• All habitat types • When natural removal rates are fast • Degree of oiling is light • Access is severely restricted or dangerous to cleanup crews • When cleanup actions will do more harm than natural removal	• Oil may persist for significant periods of time • Remobilized oil or sheens may impact other areas • Higher probability of impacting wildlife
13. Dispersants (use of dispersants requires Federal or State approval)	Dispersants are used to reduce the oil/water interfacial tension thereby decreasing the energy needed for the slick to break into small particles and mix into the water column. Specially formulated	Dispersants Boat or aircraft	• Water bodies with sufficient depth and volume for mixing and dilution • When the impact of the floating oil has been determined to be greater than the	• Use in shallow water could affect benthic resources • May adversely impact organisms in the upper 30 feet of the water column • Some water-surface and shoreline impacts could

	products containing surface-active agents are sprayed from aircraft or boats onto the slick.		impact of dispersed oil on the water-column community	occur
1 - Per 1000 feet of shoreline or oiled area				

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

6.4 WILDLIFE PROTECTION AND REHABILITATION

- The Company will support wildlife protection and rehabilitation efforts during the response but will not typically directly manage these efforts.
- Domestic Animal Specialists such as veterinarians may be utilized to rescue or clean oiled animals such as livestock, dogs, horses, etc. **FIGURE 3.1-8**, Additional Resources and Telephone Numbers.
- Company personnel will not attempt to rescue or clean affected wildlife, because such actions may cause harm to the individuals or may place the animals at further risk.
- Federal and state agencies responsible for wildlife capture and rehabilitation will typically coordinate capturing and rehabilitating oiled wildlife; a list of these agencies are included in **FIGURE 3.1-6**.
- Wildlife rehabilitation specialists may be utilized to assist in capturing and rehabilitating oiled wildlife as well as deterring unaffected animals away from the spill site. **FIGURE 3.1-8**, Additional Resources and Telephone Numbers.

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Bass, Guadalupe	*Micropterus treculii*	endemic to perennial streams of the Edward's Plateau region; introduced in Nueces River system		Texas	Bexar County
		colonial and cave-dwelling; also roosts in rock crevices, old buildings, carports, under bridges, and even in			

Bat, Cave Myotis	*Myotis velifer*	abandoned Cliff Swallow (Hirundo pyrrhonota) nests; roosts in clusters of up to thousands of individuals; hibernates in limestone caves of Edwards Plateau and gypsum cave of Panhandle during winter; opportunistic insectivore		Texas	Bexar County
Bat, Ghost-faced	*Mormoops megalophylla*	colonially roosts in caves, crevices, abandoned mines, and buildings; insectivorous; breeds late winter-early spring; single offspring born per year		Texas	Bexar County
Bear, Black	*Ursus americanus*	bottomland hardwoods and large tracts of inaccessible forested areas; due to field characteristics similar to Louisiana Black Bear (LT, T), treat all east Texas black bears as federal and state listed Threatened	T/SA;NL (Federal), T (State)	Texas	Bexar County
Beetle, A ground	*Rhadine exilis*	small, essentially eyeless ground beetle; karst features in north and northwest Bexar County	LE	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Beetle, Helotes mold	*Batrisodes venyivi*	small, eyeless mold beetle; karst features in northwestern Bexar County and northeastern Medina County	LE	Texas	Bexar County
Blindcat, Toothless	*Trogloglanis pattersoni*	troglobitic, blind catfish endemic to the San Antonio Pool of the Edward's Aquifer	T (State)	Texas	Bexar County

Blindcat, Widemouth	*Satan eurystomus*	troglobitic, blind catfish endemic to the San Antonio Pool of the Edward's Aquifer	T (State)	Texas	Bexar County
Cavesnail, Mimic	*Phreatodrobia imitata*	subaquatic; only known from two wells penetrating the Edwards Aquifer		Texas	Bexar County
Crane, Whooping	*Grus americana*	potential migrant via plains throughout most of state to coast; winters in coastal marshes of Aransas, Calhoun, and Refugio counties	LE (Federal) E (State)	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Creeper (Squawfoot)	*Strophitus undulatus*	small to large streams, prefers gravel or gravel and mud in flowing water; Colorado, Guadalupe, San Antonio, Neches (historic), and Trinity (historic) River basins		Texas	Bexar County
Crustaean, A cave obligate	*Monodella texana*	subaquatic, subterranean obligate; underground freshwater aquifers		Texas	Bexar County
Dragon-head, Correll's false	*Physostegia correllii*	wet, silty clay loams on streamsides, in creek beds, irrigation channels and roadside drainage ditches; or seepy, mucky, sometimes gravelly soils along riverbanks or small islands in the Rio Grande; or underlain by Austin Chalk limestone along gently flowing spring-fed creek in central Texas; flowering May-September		Texas	Bexar County

Falcon, American Peregrine	*Falco peregrinus anatum*	year-round resident and local breeder in west Texas, nests in tall cliff eyries; also, migrant across state from more northern breeding areas in US and Canada, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.	DL (Federal) T (State)	Texas	Bexar County
Falcon, Arctic Peregrine	*Falco peregrinus tundrius*	migrant throughout state from subspecies' far northern breeding range, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.	DL	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
		both subspecies migrate across the state from more northern breeding areas in US and Canada to winter along coast and farther south; subspecies (F. p.			

Falcon, Peregrine	*Falco peregrinus*	anatum) is also a resident breeder in west Texas; the two subspecies' listing statuses differ, F.p. tundrius is no longer listed in Texas; but because the subspecies are not easily distinguishable at a distance, reference is generally made only to the species level; see subspecies for habitat.	DL (Federal) T (State)	Texas	Bexar County
Fatmucket, Texas	*Lampsilis bracteata*	streams and rivers on sand, mud, and gravel substrates; intolerant of impoundment; broken bedrock and course gravel or sand in moderately flowing water; Colorado and Guadalupe River basins	T (State)	Texas	Bexar County
Giant-skipper, Manfreda	*Stallingsia maculosus*	most skippers are small and stout-bodied; name derives from fast, erratic flight; at rest most skippers hold front and hind wings at different angles; skipper larvae are smooth, with the head and neck constricted; skipper larvae usually feed inside a leaf shelter and pupate in a cocoon made of leaves fastened together with silk		Texas	Bexar County
Harvestman, Cokendolpher Cave	*Texella cokendolpheri*	small, eyeless harvestman; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Hawk, Zone-	*Buteo*	arid open country, including open deciduous or pine-oak woodland, mesa or mountain county, often near watercourses, and wooded canyons and tree-lined rivers along middle-slopes of desert			Bexar

tailed	*albonotatus*	mountains; nests in various habitats and sites, ranging from small trees in lower desert, giant cottonwoods in riparian areas, to mature conifers in high mountain regions	T (State)	Texas	County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Ibis, White-faced	*Plegadis chihi*	prefers freshwater marshes, sloughs, and irrigated rice fields, but will attend brackish and saltwater habitats; nests in marshes, in low trees, on the ground in bulrushes or reeds, or on floating mats	T (State)	Texas	Bexar County
Jointweed, Parks'	*Polygonella parksii*	Texas endemic; mostly found on deep, loose, whitish sand blowouts (unstable, deep, xeric, sandhill barrens) in Post Oak Savanna landscapes over the Carrizo and Sparta formations; also occurs in early successional grasslands, along right-of-ways, and on mechanically disturbed areas; flowering June-late October or September-November		Texas	Bexar County
Lizard, Spot-tailed	*Holbrookia lacerata*	central and southern Texas and adjacent Mexico; moderately open prairie-brushland; fairly flat areas free of vegetation or other		Texas	Bexar County

Earless		obstructions, including disturbed areas; eats small invertebrates; eggs laid underground			
Lizard, Texas Horned	*Phrynosoma cornutum*	open, arid and semi-arid regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September	T (State)	Texas	Bexar County
Meshweaver, Braken Bat Cave	*Cicurina venii*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Meshweaver, Madla's Cave	*Cicurina madla*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Meshweaver, Robber Baron Cave	*Cicurina baronia*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Metalmark, Rawson's	*Calephelis rawsoni*	moist areas in shaded limestone outcrops in central Texas, desert scrub or oak woodland in foothills, or along rivers elsehwere; larval hosts are Eupatorium havanense, E. greggii.		Texas	Bexar County

Mussel, False Spike	*Quadrula mitchelli*	possibly extirpated in Texas; probably medium to large rivers; substrates varying from mud through mixtures of sand, gravel and cobble; one study indicated water lilies were present at the site; Rio Grande, Brazos, Colorado, and Guadalupe (historic) river basins	T (State)	Texas	Bexar County
Onion, Elmendorf's	*Allium elmendorfii*	Texas endemic; grassland openings in oak woodlands on deep, loose, well-drained sands; in Coastal Bend, on Pleistocene barrier island ridges and Holocene Sand Sheet that support live oak woodlands; to the north it occurs in post oak-black hickory-live oak woodlands over Queen City and similar Eocene formations; one anomalous specimen found on Llano Uplift in wet pockets of granitic loam; flowering March-April, May		Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Orb, Golden	*Quadrula aurea*	sand and gravel in some locations and mud at others; found in lentic and lotic; Guadalupe, San Antonio, Lower San Marcos, and Nueces River basins	T (State)	Texas	Bexar County
		open grasslands, especially prairie, plains,			

Owl, Western Burrowing	*Athene cunicularia hypugaea*	and savanna, sometimes in open areas such as vacant lots near human habitation or airports; nests and roosts in abandoned burrows		Texas	Bexar County
Pimpleback, Texas	*Quadrula petrina*	mud, gravel and sand substrates, generally in areas with slow flow rates; Colorado and Guadalupe river basins	T (State)	Texas	Bexar County
Pipit, Sprague's	*Anthus spragueii*	only in Texas during migration and winter, mid September to early April; short to medium distance, diurnal migrant; strongly tied to native upland prairie, can be locally common in coastal grasslands, uncommon to rare further west; sensitive to patch size and avoids edges.	C	Texas	Bexar County
Plover, Mountain	*Charadrius montanus*	breeding: nests on high plains or shortgrass prairie, on ground in shallow depression; nonbreeding: shortgrass plains and bare, dirt (plowed) fields; primarily insectivorous	PT	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Rattlesnake, Timber/Canebrake	*Crotalus horridus*	swamps, floodplains, upland pine and deciduous woodlands, riparian zones, abandoned farmland; limestone bluffs,	T (State)	Texas	Bexar County

		sandy soil or black clay; prefers dense ground cover, i.e. grapevines or palmetto			
Sage, Bid red	*Salvia pentstemonoides*	Texas endemic; moist to seasonally wet, steep limestone outcrops on seeps within canyons or along creek banks; occasionally on clayey to silty soils of creek banks and terraces, in partial shade to full sun; basal leaves conspicuous for much of the year; flowering June-October		Texas	Bexar County
Salamander, Cascade Caverns	*Eurycea latitans complex*	endemic; subaquatic; springs and caves in Medina River, Guadalupe River, and Cibolo Creek watersheds within Edwards Aquifer area	T (State)	Texas	Bexar County
Salamander, Comal blind	*Eurycea tridentifera*	endemic; semi-troglobitic; found in springs and waters of caves	T (State)	Texas	Bexar County
Salamander, Texas	*Eurycea neotenes*	endemic; troglobitic; springs, seeps, cave streams, and creek headwaters; often hides under rocks and leaves in water; restricted to		Texas	Bexar County

		Helotes and Leon Creek drainages			

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Skunk, Plains spotted	*Spilogale putorius interrupta*	catholic; open fields, prairies, croplands, fence rows, farmyards, forest edges, and woodlands; prefers wooded, brushy areas and tallgrass prairie		Texas	Bexar County
Snake, Texas garter	*Thamnophis sirtalis annectens*	wet or moist microhabitats are conducive to the species occurrence, but is not necessarily restricted to them; hibernates underground or in or under surface cover; breeds March-August		Texas	Bexar County
Snake, Texas Indigo	*Drymarchon melanurus erebennus*	Texas south of the Guadalupe River and Balcones Escarpment; thornbush-chaparral woodlands of south Texas, in particular dense riparian corridors; can do well in suburban and irrigated croplands if not molested or indirectly poisoned; requires moist microhabitats, such as rodent burrows, for shelter	T (State)	Texas	Bexar County
Spider, Government Canyon Bat Cave	*Neoleptoneta microps*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
		forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including			

Stork, Wood	*Mycteria americana*	salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960	T (State)	Texas	Bexar County

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Tern, Interior Least	*Sterna antillarum athalassos*	subspecies is listed only when inland (more than 50 miles from a coastline); nests along sand and gravel bars within braided streams, rivers; also know to nest on man-made structures (inland beaches, wastewater treatment plants, gravel mines, etc); eats small fish and crustaceans, when breeding forages within a few hundred feet of colony	LE (Federal) E (State)	Texas	Bexar County
Tortoise, Texas	*Gopherus berlandieri*	open brush with a grass understory is preferred; open grass and bare ground are avoided; when inactive occupies shallow depressions at base of bush or cactus, sometimes in underground burrows or under objects; longevity greater than 50 years;	T (State)	Texas	Bexar County

		active March-November; breeds April-November			
Twistflower, Bracted	*Streptanthus bracteatus*	Texas endemic; shallow, well-drained gravelly clays and clay loams over limestone in oak juniper woodlands and associated openings, on steep to moderate slopes and in canyon bottoms; several known soils include Tarrant, Brackett, or Speck over Edwards, Glen Rose, and Walnut geologic formations; populations fluctuate widely from year to year, depending on winter rainfall; flowering mid April-late May, fruit matures and foliage withers by early summer		Texas	Bexar County
Vireo, Black-capped	*Vireo atricapilla*	oak-juniper woodlands with distinctive patchy, two-layered aspect; shrub and tree layer with open, grassy spaces; requires foliage reaching to ground level for nesting cover; return to same territory, or one nearby, year after year; deciduous and broad-leaved shrubs and trees provide insects for feeding; species composition less important than presence of adequate broad-leaved shrubs, foliage to ground level, and required structure; nesting season March-late summer	LE (Federal) E (State)	Texas	Bexar County
Warbler, Golden-cheeked	*Dendroica chrysoparia*	juniper-oak woodlands; dependent on Ashe juniper (also known as cedar) for long fine bark strips, only available from mature trees, used in nest construction; nests are placed in various trees other than Ashe juniper; only a few	LE (Federal) E (State)	Texas	Bexar County

		mature junipers or nearby cedar brakes can provide the necessary nest material; forage for insects in broad-leaved trees and shrubs; nesting late March-early summer			

T - Threatened
E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Wild-mercury, Hill Country	*Argythamnia aphoroides*	Texas endemic; mostly in bluestem-grama grasslands associated with plateau live oak woodlands on shallow to moderately deep clays and clay loams over limestone on rolling uplands, also in partial shade of oak-juniper woodlands in gravelly soils on rocky limestone slopes; flowering April-May with fruit persisting until midsummer		Texas	Bexar County
Wolf, Gray	*Canis lupus*	extirpated; formerly known throughout the western two-thirds of the state in forests, brushlands, or grasslands	LE (Federal) E (State)	Texas	Bexar County
Wolf, Red	*Canis rufus*	extirpated; formerly known throughout eastern half of Texas in brushy and forested areas, as well as coastal prairies	LE (Federal) E (State)	Texas	Bexar County
Woollywhite, Sandhill	*Hymenopappus carrizoanus*	Texas endemic; disturbed or open areas in grasslands and post oak woodlands on deep sands derived from the		Texas	Bexar County

		Carrizo Sand and similar Eocene formations; flowering April-June			

T - Threatened
E - Endangered

Reference:
- Texas Parks & Wildlife Dept. - Annotated County Lists of Rare Species

6.6 VULNERABILITY ANALYSIS (DETAILED)

VULNERABILITY ANALYSIS (DETAILED)
Water Intakes:
(b) (7)(F), (b) (3) [redacted]
Schools:
(b) (7)(F), (b) (3) [redacted]
Medical Facilities:
There are no hospitals located along the spill pathway from the terminal.
Residential Areas:
Residential developments are located south of the terminal on the southern side of Houston Street. Due to the low lying topography on the south adjacent property, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property.

6.6 VULNERABILITY ANALYSIS (DETAILED) , CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Businesses:
Commercial developments are located to the north and west of the terminal property. Due to the low lying topography on the south adjacent property, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property.
Wetlands or Other Sensitive Environments:
The United States Geological Survey (USGS) Topographic Map for the San Antonio East, Texas Quadrangle does not indicate any wetlands within 2 miles of the terminal or along the potential spill pathway.
Fish and Wildlife:

Refer to SECTION 6.5, Endangered and Threatened Species by State.
Lakes and Streams:
The San Antonio Terminal is roughly 1.3 miles northwest of Rosillo Creek and 1.4 miles northeast of Salado Creek. The route of travel for spilled oil from the terminal is southwest from the tank farm into the south adjacent property. Due to the low lying topography on the south adjacent property, and existing out of service rail bed, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property. Therefore, it is believed a spill would not likely impact these waterways.

6.6 VULNERABILITY ANALYSIS (DETAILED), CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Endangered Flora and Fauna:
Refer to SECTION 6.5, Endangered and Threatened Species by State.
Recreational Areas:
No parks or other recreational areas are located the vicinity of the terminal.
Transportation Routes (Air, Water, Land):
If a spill occurred at this terminal, it may be necessary to close transportation routes in the area. Schools with transportation routes potentially affected by a worst case discharge include: Kirby Elementary School, Pfeiffer Elementary School, Davis Middle School, Sam Houston High School, Carroll Elementary School, and Hirsch Elementary School. Due to spill drainage routes and the availability of alternative transportation routes for the schools, a spill is unlikely to impact the daily operations of the schools. However, if a spill were to impact Houston Street, Interstate 410, Interstate 10, or interstate access roads, the schools should be notified and instructed to use alternate transportation routes.
Utilities:
There are no utilities in the facility area that could potentially be impacted by a worst case discharge scenario.
Other Applicable Areas:

6.7 TACTICAL OVERVIEW MAP

6.8 TACTICAL PLAN INDEX

SITE #	SITE NAME

Site 1	Field Depression
Site 2	Field Berm
Site 3	410 South Feeder

6.9 TACTICAL PLANS

Click here for Site 1 - Field Depression

6.9 TACTICAL PLANS , CONTINUED

Click here for Site 2 - Field Berm

6.9 TACTICAL PLANS , CONTINUED

Click here for Site 3 - 410 South Feeder

6.10 SENSITIVITY MAPS

Click here for Map 1 of 1

SECTION 7 Last revised: March 17, 2010

SUSTAINED RESPONSE ACTIONS

SECTION 7
SUSTAINED RESPONSE ACTIONS, CONTINUED

7.1 RESPONSE RESOURCES

7.1.1 Response Equipment

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Response Equipt. Storage - Warehouse						
Absorbent	Pads	1 to 5 - Packages	Standard	Various	Ready	Response Equipt. Storage - Warehouse
Communication Equipment - Refer to Section 7.1.6						
Response Equipt. Storage - Warehouse						
Hand Tools	Rakes	1 to 5	Standard	Various	Ready	Response Equipt. Storage - Warehouse
Hand Tools	Shovels	1 to 5	Standard	Various	Ready	Response Equipt. Storage - Warehouse

***Note:** Response equipment is tested and deployed as described in **FIGURE A.1-2**, **FIGURE A.1-4**, and **FIGURE A.1-5** of the Spill Response Plan.

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

* USCG Classified OSRO for facility

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
*TAS Environmental Services, LP (San Antonio) San Antonio, Texas	Full response capabilities	1 hours
*Eagle SWS, (San Antonio) Cibolo, TX	Full response capabilities	1 hours
*Miller Environmental Services, Inc. Corpus Christi, TX	Full response capabilities	5 hours

7.1.2 Response Equipment Inspection and Maintenance

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

Containment boom During boom deployment exercises, boom will be inspected for signs of structural deficiencies. If tears in fabric or rotting is observed, boom will be repaired or replaced. In addition, end connectors will be inspected for evidence of corrosion. If severe corrosion is detected, equipment will be repaired or replaced.

Miscellaneous equipment Other response equipment identified in this Plan will be inventoried and tested on a semiannual basis to ensure that the stated quantities are in inventory and in proper working order. The equipment inspections and records are retained for a period of five years. Exercise requirements are listed in **APPENDIX A.1**. A Spill/Exercise Documentation form is in **FIGURE A.1-4**. **FIGURE A.1-5** provides a log for response equipment testing and deployment drills.

7.1.3 Contractors, Contractor Equipment, and Labor

- The Company's primary response contractors' names and phone numbers as well as contact information of other companies who can provide spill response services are provided in **FIGURE 3.1-6** or **FIGURE 3.1-7**.
- The Company has ensured by contract or formal agreements the availability of private personnel and equipment necessary to respond, to the maximum extent practicable, to the Worst Case Discharge or the substantial threat of such discharge.
- Contractors deploy and inspect boom to meet PREP guidelines. Company requires that these exercises are completed annually.
- **APPENDIX B** contains evidence of contracts for the Company's primary response contractors and equipment lists of contractors without USCG classification.

7.1.4 Command Post

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

FIGURE 7.1-2 - COMMAND POST CHECKLIST

COMMAND POST CHECKLIST	
Positioned outside of the present and potential Hazard Zone.	☐
Positioned away from the general activities such as traffic, noise, and confusion associated with an incident.	☐

Have ability to provide security and to control access to the ICP as necessary.	☐
Adequate space for size of staff.	☐
24-hour accessibility.	☐
Personal hygiene facilities.	☐
Suitability of existing communications resources (phone/fax/radio).	☐
Suitability of private conference and briefing rooms.	☐
Location or building has capability to grow, as necessary.	☐
Notify other parties of Command Post location; provide maps/driving directions.	☐
Determine staging areas and incident base locations.	☐
Identify future need to move or upgrade facilities.	☐

Command Posts for this facility are located at:a safe place (which may change per incident) per Incident Commander.

7.1.4 Command Post

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

FIGURE 7.1-2 - COMMAND POST CHECKLIST

7.1.5 Staging Area

A Staging Area is a temporary location at an incident where personnel and equipment are kept while awaiting tactical assignments. Staging Areas should be located relatively close to the incident, yet located sufficiently away to provide a safe location for personnel and equipment to await assignments. In an emergency response, numerous staging areas may be required to support containment and cleanup operations.

In selecting a suitable staging area, the following items 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.
- Be in a large open area in order to provide storage for equipment and not interfere with equipment loading and offloading operations.
- Have different access routes for incoming and outgoing resources from the direct traffic of the incident response, whenever possible.

7.1.5 Staging Area, Continued

- Be conducive for loading and offloading of personnel; consider having moorage available if vessels are required to aid the loading/offloading of personnel.
- Consider the need to incorporate specialty equipment such as ambulance, fire equipment, police cars, etc.

FIGURE 7.1-3 - STAGING AREA CHECKLIST

STAGING AREA CHECKLIST	
Positioned outside of the present and potential Hazard Zone.	☐
Positioned away from the general activities such as traffic, noise, and confusion associated with an incident; whenever possible, identify different access routes.	☐
Have ability to provide security and to control access to the staging area as necessary.	☐
Adequate space for size, amount, and type of equipment being assigned to the area (e.g., boom trailers, skimmers, vacuum trucks, back hoes, frac tanks).	☐
24-hour accessibility, but establish control and assist with check-in/check-out process for equipment and personnel arriving and leaving the Staging Area.	☐
Personal hygiene facilities necessary and available.	☐
Communication process established for calling for and returning equipment; prevent resources from freelancing or “doing their own thing”.	☐
Suitability of existing communications resources (phone/fax/radio).	☐
Staging Area may need to provide a temporary means for fueling; ensure safety and environmental requirements are reviewed.	☐
Notify Command Post of Staging Area location; provide maps/driving directions.	☐
Provide area to form operational units, such as Task Forces or Strike Teams.	☐
Designated areas to avoid confusion between incoming and outgoing equipment versus equipment ready for deployment.	☐

Staging areas for this facility are located at: an appropriate place (which may change per incident) per Incident Commander.

7.1.6 Communications Plan

Communications include:

- The "hardware" systems that transfer information.
- Planning for the use of all available communications frequencies and resources.
- The processes and procedures for transferring information.

cell phones
- computers

Company communications for small incidents will be conducted via telephone lines, cellular telephones, PDA's, two way radios, e-mail, and fax machines.

Additional communications equipment (two way radios, VHF portable radios with chargers and accessories, command post with UHF, VHF, single sideband, marine, aeronautical, telephone, and hard-line capability) may be purchased or leased from a communications company in the area. Use of communications equipment, whether purchased or leased, must comply with FCC requirements prior to operation. Communications with government agencies, state police, and contractors will be conducted via telephone lines or cellular phones. As deemed necessary, government agencies responding to an incident on-site will be incorporated into the communications plan. Refer to **FIGURE 7.1-4** for guidelines to setup communications.

The Communications Group Leader is responsible for ensuring that the Incident Command and emergency responders have reliable and effective means of communication by establishing processes and procedures for transferring information. Several communication networks may be considered depending upon the size and complexity of the incident. These may include:

- **Command Net** - Established to link supervisory personnel from Incident Commander down to and including Division and Group supervisors.
- **Tactical Nets** - Established in a variety of ways, e.g., by agency, department, geographical area, or function. Tactical nets may be established for each Branch, or for Divisions and Groups, depending upon hardware and frequency availability and specific incident needs.
- **Support Nets** - Established on larger incidents to handle logistics traffic and resource status changes.
- **Ground-to-Air** - Established to coordinate ground-to-air traffic.
- **Air-to-Air** - Assigned for coordination between aircraft assigned to an incident

This may also involve activation of multiple types of communications equipment and coordination among multiple responding agencies and contractors.

The Communications Plan (if necessary, written at the time of an incident) will identify system, network, channel, telephone numbers, radio frequencies, and assignments to the responders.

FIGURE 7.1-4 - COMMUNICATIONS CHECKLIST

COMMUNICATIONS CHECKLIST	
Develop a Communications Plan; consider communication levels needed.	☐
Phone lines available, consider lines per staff element - contact local provider.	☐
Fax lines available, consider lines per group or unit requirements - contact local provider.	☐
Cell phone coverage providing means to maintain communications.	☐
Company and resource phone list available and being maintained.	
Recharging stations for cellular phones.	☐

VHF radio communications: • Establish frequencies • Assign call signs • Distribute radios • Establish communications schedule	☐
Recharging stations for VHF radios.	☐
Determine need for VHF repeaters.	☐
Copy machine available.	☐
Internet access available; necessary?	☐
Responders have capability to communicate with aircraft.	☐

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

7.2 PUBLIC AFFAIRS

Company Spokesperson

The Incident Commander shall designate a company spokesperson at the scene and identify the spokesperson to Management and Public Affairs. Such person shall retain spokesperson's duties until relieved of those duties by the Incident Commander. The designated company spokesperson's duties shall include:

- Interaction with the company's Public Affairs Group about the incident and the progress of the Company's response;
- Interaction with the Incident Commander regarding requests for information from media and/or public;
- Interaction with media and/or public, including those who may be directly affected (through evacuation or otherwise) by the incident and/or the Company's response to the incident;
- Dissemination of truthful, complete, and appropriate information in response to requests and/or needs of media and/or public.

Unless designated by the Incident Commander, the Company spokesperson shall not be the principal contact between the company and responding or other appropriate governmental agencies.

The designated Company spokesperson shall have been trained on this section of the Integrated Contingency Plan and shall have received other training regarding the responsibilities of a Company spokesperson prior to his/her appointment as Company spokesperson. Any person who has not received such training shall not be qualified to serve as Company spokesperson.

The designated spokesperson shall notify appropriate personnel from the responding company, contractual responder, and necessary governmental agencies that he/she has been designated by the Incident Commander as the on-scene Company spokesperson and that as the designated spokesperson, he/she is the one and only spokesperson for the Company until advised otherwise. The spokesperson shall also advise responding company and contractual personnel that only the designated on-scene spokesperson should speak with the media and/or public.

Message Verification

Prior to providing any information regarding an incident to the media and/or public in any form, the Company spokesperson must clear the message both factually and contextually with the Incident Commander. If practical and feasible, the Company spokesperson should also consult with the Legal Department and Public Affairs prior to providing any information to the media and/or public.

If consultation with Public Affairs is not feasible prior to the required release of information, then the Incident Commander and spokesperson shall use the approved media statement example listed below. **This statement is only to be used if a briefing with Legal and Public Affairs is not available.**

Media Statement

This statement is to be used only in the following situations:

- **By the on-scene Company spokesperson designated by the Incident Commander**
- **When Legal Department and Public Affairs consultation is unavailable**

We had an event (*describe incident type/location*). At this time we're working to manage the (*release, fire, etc., OR it is under control*). While we are still checking in with all our employees and others in the area, we believe (*acknowledge whether there are injuries or not*). We have notified local officials, including (*identify responding agencies*) and they are (*offering help or assisting*) as needed. Along with these agencies, we are monitoring the situation closely and will advise of any needed actions (*or, describe advised actions, if any*). As I'm sure you can understand, I must now return to my duties here. We'll have updates as information becomes available through (*identify response spokesperson if known, internal or outside*). Thank you for your patience.

Interviews

The Company spokesperson should refrain from granting on-camera interviews, where practical. If the spokesperson must provide an on-camera interview without a representative of Public Affairs present, then the spokesperson should consult with the Company's Public Affairs Group in preparation for the interview.

7.3 SITE SECURITY MEASURES

(b) (7)(F), (b) (3)

FIGURE 7.3-1 - SITE SECURITY CHECKLIST

(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

7.4 WASTE MANAGEMENT

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

- Worker safety
- Waste minimization
- Minimization of environmental impacts
- Proper management of the recovered materials compliant with regulatory requirements

During the emergency phase of a response, it is important to quickly engage the company waste specialists (Environmental Specialist) or activate a Disposal Group to address potential waste issues.

Depending on the size and complexity of the response, the following action items may be conducted initially during a spill response:

- Development of a Site Safety and Health Plan (**SECTION 5.4**) addressing the proper PPE and waste handling procedures

- Development of a Disposal Plan (**SECTION 5.6**) in accordance with any federal, state, and/or local regulations. Facility-specific disposal locations for different types of materials are listed in **FIGURE 7.4.4**.

Potential waste management issues to consider:

- Type of waste being generated and collected
- Organization of waste collection, segregation, and storage
- Available storage to hold waste being generated
- Handling and storage requirements of recovered product
- Labeling and inspection of temporary storage areas and waste containers
- Continuous tracking of recoverable materials versus non-recoverable to better estimate amount of waste that could be generated over the short and long-term
- Review requirements for secondary containment for waste collection containers
- Regulatory review of applicable laws to ensure compliance and (if appropriate) provide agency notification or obtain permits associated with short and long term storage of generated waste
- Regulatory review of applicable laws to ensure compliance and (if appropriate) obtain permits associated with the transportation of generated waste
- Registered transportation resources along with approved treatment, storage, or disposal facilities
- Disposal of all waste in a safe and approved manner
- Documentation of all waste handling, testing, inspection, and disposal activities

Activities associated with waste minimization during cleanup and recovery are:

- Reusing materials when possible
- Recycling or reclaiming waste
- Segregating waste (hazardous versus non-hazardous or heavily impacted versus slightly impacted)
- Treating waste, in accordance with the regulations and permits, to reduce hazards or reducing amount of waste generated

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

A general flow chart for waste management guidelines is provided in **FIGURE 7.4-1**. An overall checklist for containment and disposal is provided in **FIGURE 7.4-2**.

FIGURE 7.4-1 - WASTE MANAGEMENT FLOW CHART

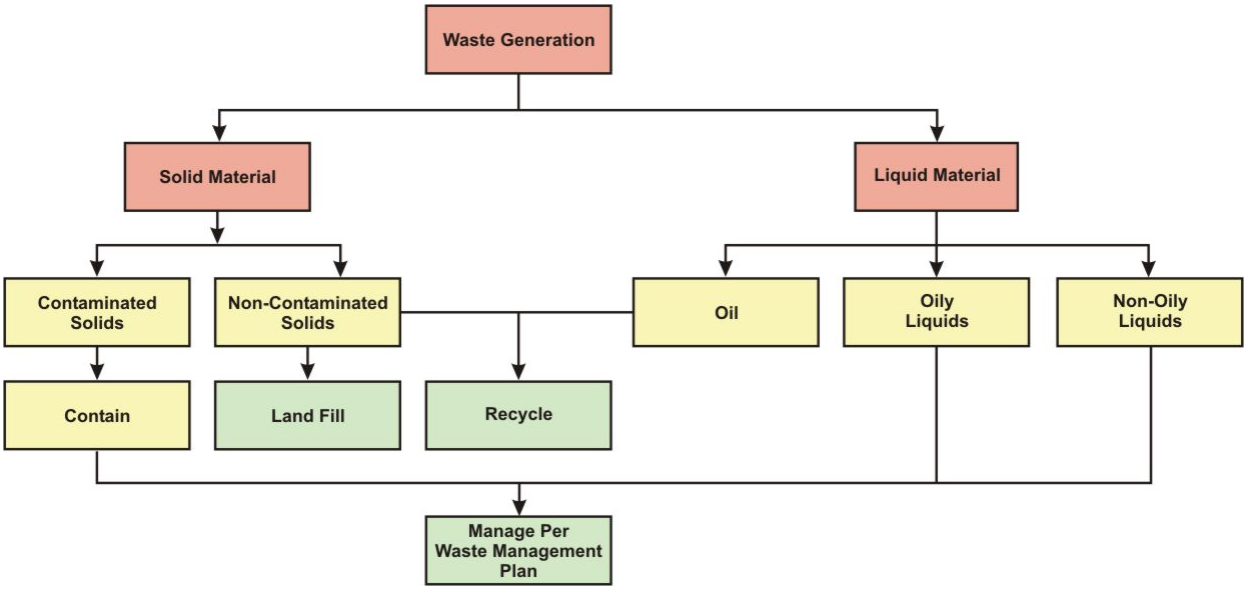

FIGURE 7.4-2 - GENERAL WASTE CONTAINMENT AND DISPOSAL CHECKLIST

CONSIDERATION	
Has the appropriate waste manager been contacted?	☐
Has each container been labeled?	☐
Waste handling process implement are based on the material being recovered (e.g., whether a waste or reusable product)?	☐
Has recovered material been containerized and secured?	☐
Has each of the discrete waste streams been identified?	☐
Has a representative sample of each waste stream requiring analysis been collected?	☐
Has the sample been sent to a 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?	☐
The transporter(s) being used to transport hazardous or nonhazardous waste are properly registered as required by Federal, State, or Local requirements?	☐

Local requirements?	☐
Is the waste being taken to an approved disposal site?	☐
Is the manifest/Bill of Lading properly Completed?	☐
Consider if permits are required?	☐

7.4.1 Waste Storage

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

Use of an off-site storage may depended on the approval of State and Local authorities. Consider the following elements affecting the choice of a potential storage site:

- Geology
- Soil
- Surface water
- Covered materials
- Climatic factor
- Emissions
- Odor concerns
- Access
- Ground water
- Flooding
- Slope
- Capacity
- Land use
- Security
- Public contact

FIGURE 7.4-3 - TEMPORARY STORAGE METHODS

CONTAINMENT	PRODUCT						
	OIL	OIL/WATER	OIL/SOIL	OIL/DEBRIS (Small)	OIL/DEBRIS (Medium)	OIL/DEBRIS (Large)	CAPACITY
Drums	X	X	X	X			0.2-0.5 yd^3
Bags			X	X			1.0-2.0 yd^3
Boxes			X	X			1-5 yd^3
Roll top rolloff	X		X	X	X	X	15-25 yd^3
Vacuum box	X	X					15-25 yd^3
Frac tank	X	X					500-20,000 gal
Poly tank	X	X					200-4,000 gal
Vacuum truck	X	X	X				2,000-5,000

							gal
Tank trailer	X	X					2,000-4,000 gal
Barge	X	X					3,000+ gal
Berm, 4 ft			X	X	X	X	1 yd^3
Bladders	X	X					25-1,500 gal

7.4.2 Waste Transfer

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

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

There are two general classes of transfer systems that could be employed for effective oily waste transfer operations. The following is a brief description of some transfer systems:

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

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

7.4.3 Waste Disposal

Waste must be disposed of in accordance with Federal and State requirements. Each incident should be reviewed carefully to ensure that appropriate disposal techniques are employed.

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

Recycling
Recycling involves processing discarded materials for another use.

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

In Situ Burning/Open Burning
Burning techniques entail igniting oil or oiled debris allowing it to burn under ambient conditions. These disposal techniques are subject to restrictions and permit requirements established by Federal, State, and Local laws.

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

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

FIGURE 7.4-4 - FACILITY SPECIFIC DISPOSAL VENDORS

MATERIAL	DISPOSAL FACILITY	LOCATION
Recovered Product	Eagle Construction and Environmental Services	414 FM 1103 Cibolo, TX 78108
	Miller Environmental	600 Flato Road Corpus Christi, TX 78405
	TAS Environmental	14350 Lookout Road San Antonio, TX 78233
	Eagle Construction and Environmental Services	414 FM 1103 Cibolo, TX 78108
		600 Flato Road Corpus Christi, TX

Contaminated Soil	Miller Environmental TAS Environmental	78405 14350 Lookout Road San Antonio, TX 78233
Contaminated Equipment	Eagle Construction and Environmental Services Miller Environmental TAS Environmental	414 FM 1103 Cibolo, TX 78108 600 Flato Road Corpus Christi, TX 78405 14350 Lookout Road San Antonio, TX 78233
Personnel Protective Equipment	Eagle Construction and Environmental Services Miller Environmental TAS Environmental	414 FM 1103 Cibolo, TX 78108 600 Flato Road Corpus Christi, TX 78405 14350 Lookout Road San Antonio, TX 78233
Decontamination Solutions	Eagle Construction and Environmental Services Miller Environmental TAS Environmental	414 FM 1103 Cibolo, TX 78108 600 Flato Road Corpus Christi, TX 78405 14350 Lookout Road San Antonio, TX 78233
Adsorbents and Spent Chemicals	Eagle Construction and Environmental Services Miller Environmental TAS Environmental	414 FM 1103 Cibolo, TX 78108 600 Flato Road Corpus Christi, TX 78405 14350 Lookout Road San Antonio, TX 78233

SECTION 8 Last revised: February 2006

DEMOBILIZATION / POST-INCIDENT REVIEW

8.1 CLOSURE AND TERMINATION OF THE RESPONSE

In these stages, the cleanup may have reached a level of resolve satisfactory to the ICS or UCS (Unified Incident Command comprising of Federal, State, and Local agencies). However, considering the size and complexity of the event, it is possible for the cleanup to reach closure, but termination may require follow-up actions.

Closure and termination issues to consider:

- The IMT (ICS / UCS) determine each area is clean before halting cleanup operations.
- Demobilization Plan, entering final stages prioritizing the removal of equipment and personnel.
- Equipment may need both maintenance and decontamination before being demobilized.
- Facilities (staging area, Command Post, etc.) are being shut down anticipating termination of operations.
- Determine what documentation should be maintained, where, and for how long.
- Safety Plans and safety equipment are being adjusted; heightened awareness is required as the event approaches closure and termination.
- If employed, utilize the IAP to document and demonstrate agreement between the ICS / UCS (RP and Agencies) and any conditions established for the closure or termination of the event.
- Document activities that will continue after the cleanup ends; examples include incident debriefing, bioremediation, NRDA studies, claims, and legal actions.
- Consider expressing gratitude to the community, police department, fire department, and emergency crews for their work during the response.

8.2 DEMOBILIZATION

Developing a Demobilization Plan may considerably improve the efficiency and effectiveness of the demobilization process (**SECTION 5.8**). A Demobilization Checklist is provided in **FIGURE 8.2-1**.

FIGURE 8.2-1 - DEMOBILIZATION CHECKLIST

DEMOBILIZATION CHECKLIST	
Assign personnel to identify surplus resources and probable release times.	☐
Work with Operational and Planning Group leaders to 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

A Post-Incident review will be conducted for significant Incidents. The review shall be scaled to fit the seriousness and complexity of the incident and conducted in a timely manner. The purpose of the review is to thoroughly and objectively examine the incident based on the known facts and to determine a potential root cause using a systematic process to identify the cause of the incident.

The review must be conducted with the overall objectives of ensuring:

- Information Collection
- Team review, scaled to the complexity of the event
- Root Cause Analysis, (one member of the team must be knowledgeable in RCA methods, **FIGURE 8.3-1**)
- Identified and assigned action items
- Analysis and corrective action acceptance

FIGURE 8.3-1 - ROOT CAUSE ANALYSIS FORM

ROOT CAUSE ANALYSIS FORM	Lynx Incident ID#
SECTION I: RCA Information	
List all Root Cause Analysis Team Members (At a minimum, the employee and supervisor must be members of the Root Cause Analysis team).	
Employee Name:	Investigation Team Leader:
Supervisor:	Additional Team Members:
Description of Incident:	
Location of Incident:	Date of Incident:

Location of RCA	Date of RCA:

RCA Methodology: ☐ Fishbone ☐ Tap Root™ ☐ Three Whys ☐ What If

SECTION II: Root Cause Categories

Select 2-3 main causal factors identified by the RCA for the incident. For those selected, note the conditions or facts discovered by the RCA for that factor. (Use Root Cause Guidelines to determine the categories that apply).

Procedure		**Equipment**		**Management Systems**		**Individual Performance**	
	Not used or followed		PM needs improvement		Standards, policy or admin. controls need improvement		Adverse work environment (such as hot, humid or
	Followed incorrectly		Repeat failure		Audit and inspections need improvement		Excessive fatigue or personal factor
	Wrong procedures		Design		Standards, policy or admin. controls not used		Accumulative effects
	Not Available		Equipment defect		Change Management		Knowledge performance
			Tolerable failure		Corrective action		Employee machine interface needs improvement - Labels
Notes:		Notes:		Notes:			Employee machine interface needs improvement - Tools
							Employee machine interface needs improvement - Work arrangement
							Employee machine interface needs improvement - Excessive lifting

Work Site Administration		**Training**		**Communications**		
	Job preparation needs improvement		Training materials need improvement		Communication hand-off	Notes:
	Selection of worker needs improvement		Training not understood		Communication not timely	

	Enforcement of policy or procedure needs improvement		No training provided		No communication	
	Feedback during work needs improvement				Misunderstood communication	
Notes:			Notes:		Notes:	

FIGURE 8.3-1 - ROOT CAUSE ANALYSIS FORM, CONTINUED

ROOT CAUSE ANALYSIS FORM, CONTINUED										Lynx Incident ID#
SECTION III: Problem Solving Process										
Mark the symptoms that best describe the causal factors from Section II. Use the problem solving guidelines to determine the symptoms that apply).										
Vision		**Decision Rights**		**Virtues & Talents**		**Incentives**		**Knowledge Systems**		
	Lack of shared direction		Things slip through cracks		Violations of Principles		Lack of accountability		Information not shared	
	No clear sense of priorities		Turf wars, slow decisions		Poor work ethic		Short term behavior		Poor feedback system	
	Hidden agendas		Finger pointing		Arrogance		Optimizing parts vs. whole		Poor economic and critical thinking	
	Low energy		Unsure who is responsible		Victim mentality		Low morale/trust problems		Not learning or improving	
	People working on wrong things		Task vs. results oriented		Not a team player		Excessive focus on individual scorecards		Poor measures	
	Status quo		Poor delegation		Environment not open		Wrong behavior		Repeated mistakes	
	Fire fighting		Tragedy of the		Excessive					

			Commons		politics				
			Limited risk-taking		Hierarchy				

SECTION IV: Investigation Notes
Root Cause and Impact (What did you learn?)

SECTION V: Action Items Generated and Responsibilities (Must be present to be a responsible party)	
1.	
Target date:	Responsible Party:
2.	
Target date:	Responsible Party:
3.	
Target date:	Responsible Party:
4.	
Target date:	Responsible Party:
5.	
Target date:	Responsible Party:
6.	
Target date:	Responsible Party:
7.	
Target date:	Responsible Party:
8.	
Target date:	Responsible Party:

Enter the Lynx Incident ID# on each page of this form.

Provide supporting documentation and additional comments if necessary.

Based on the size, seriousness, and complexity of the event, the Post-Incident Review may include or schedule a separate review to evaluate the Company's ability to:

- Follow notification procedures
- Employ staff mobilization procedures
- Operate within the response management system described in the Plan

Follow response methods described in the Plan
- Contact and effectively utilize response equipment or contractors listed in the Plan
- Document the response actions taken

The purpose of the review is to review the efficiency and effectiveness of the response as well as identify actual or potential deficiencies in the Plan (**FIGURE A.1-4**). Appropriate changes to programs, procedures, and operations will be made based on the results of the review.

The Compliance Manager or designee is responsible for reviewing and incorporating post-drill evaluation improvements into the Plan when these improvements materially affect the Plan.

In the event of a PHMSA reportable incident, complete the Post-Accident Review Form (**FIGURE 8.3-2**).

FIGURE 8.3-2 - POST-ACCIDENT REVIEW FORM

(To be performed within 30 days following the initial response)

LOCATION			
Division:	System:	Index Name:	Index #:
Date of Accident:	Time of Accident:	Station Name:	Station #:
Review Team Members			
First Name	Last Name	First Name	Last Name
Description of Events/Hazards:			
Response Taken:			
Corrective Action:			
RELEASE (complete if needed)			
Substance:	Estimated Volume: __ Units	Attach Additional Comments/Information	Display
INJURY/ILLNESS (complete if needed)			
Injured First Name:	Injured Last Name:	Employee Number:	
Lost Time ☐ Yes ☐ No	Medical Aid ☐ Yes ☐ No	First Aid ☐ Yes ☐ No	
Nature of Injury/Illness:			

ANALYSIS
Method of Investigation ☐ Fish Bone ☐ MBM Problem Solving ☐ Informal ☐ Tap Root ☐ Other _____
ROOT CAUSE - SYSTEM PROBLEMS (mark all that apply)
Cause ☐ Management Systems ☐ Training ☐ Individual Performance ☐ Communications ☐ Equipment Difficulties ☐ Undetermined
What was determined to be the cause of the Accident/Emergency?
OPERATOR QUALIFICATION
Did an individual's performance of a covered task contribute to the accident? ☐ Yes ☐ No
Is the procedure for the cover task adequate? ☐ Yes ☐ No
Was the covered task procedure followed accurately? ☐ Yes ☐ No

FIGURE 8.3-2 - POST-ACCIDENT REVIEW FORM, CONTINUED

(To be performed within 30 days following the initial response)

Comments (if performance of a cover task contributed to the accident, determine what method of requalification is needed. Re-training/Re-testing)	
RESPONSE TO A LEAK/SPILL	
Did we know to use the equipment to assess the extent and coverage of the release and determine the hazardous areas?	☐ Yes ☐ No
Was the employee's actions effective during the response?	☐ Yes ☐ No
Was the contractor's performance effective during the response?	☐ Yes ☐ No
Did we have adequate communication during the response?	☐ Yes ☐ No
If agencies were involved in the response, did Company work well with each agency?	☐ Yes ☐ No
Is further liaison with the government agencies recommended?	☐ Yes ☐ No
Have we done any public awareness in the geographic area of the accident?	☐ Yes ☐ No
Is additional public awareness communication in the geographic area of the accident recommended?	☐ Yes ☐ No
Is there a need to review/modify the emergency response manual as a result of this accident?	☐ Yes ☐ No
Comments (How would you evaluate our our efforts to control the release in order to minimize the hazard?)	

RECOMMENDATION/CORRECTIVE ACTIONS TO MINIMIZE POSSIBILITY OF REOCCURENCE			
List Action Plan/ Recommendation (Number in Sequence)	Responsibility - Company Rep.		Date Completed
	First Name	Last Name	
Other Accident Information Attached ☐ Photos ☐ RCMP Report ☐ Testing Reports ☐ Other _____			

Agency	Responsibility - Company Rep.		Date	Time	Summary of Discussion (Attach additional Information if needed)
	First Name	Last Name			
☐ DOT					
☐ OSHA					

Reported Prepared By			
Signature	First Name	Last Name	Date

Investigated By (Company Supervisor)			
Signature	First Name	Last Name	Date

8.3.1 Final Spill Cleanup Report

A final incident report may be prepared by the Incident Commander or designee after completion of spill cleanup activities for internal use. The report may be written in the narrative form, captured by a company form, and/or stored in a company database. It may include PREP documentation or other agency documents, plus other information as 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 potential cause of 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 significant 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

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APPENDICES

A. **TRAINING / EXERCISES**

B. **CONTRACTOR RESPONSE EQUIPMENT**

C. **SPCC PLANS**

D. **HAZARD EVALUATION AND RISK ANALYSIS**

E. **CROSS-REFERENCES**

F. **ACRONYMS AND DEFINITIONS**

G. **ADDITIONAL INFORMATION**

APPENDIX A Last revised: September 1, 2011

TRAINING / EXERCISES

A.1 EXERCISE REQUIREMENTS AND SCHEDULES

The Company participates in the National Preparedness for Response Exercise Program (PREP). **FIGURE A.1-1** provides a description of the various required PREP Exercise requirements (not all exercises are necessarily required for each facility).

As prescribed in PREP, the company will test their response plan in its entirety every three years. As allowed by PREP, the company has identified individual plan components (**FIGURE A.1-2**) to be exercised in portions within the triennial cycle rather than conducting one major exercise every three years. The components (**FIGURE A.1-2**) correspond with PREP "Exercise" objectives to ensure the plan is adequate to respond to a spill event.

During each triennial cycle, components of the Plan (**FIGURE A.1-2**) are be exercised at least once. Responding to actual event can be credited for an exercise.

The Compliance Manager or designee 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.1-3** provides a documentation form which may be used for a Qualified Individual Notification exercise. **FIGURE A.1-4** provides a Spill/Exercise Documentation form. **FIGURE A.1-5** provides an Equipment Testing and Deployment Exercise documentation form. **FIGURE A.1-6** provides an Incident Management Team Staffing Exercise documentation form. Please note, other comparable company forms may be used instead of these specific forms.

FIGURE A.1-1 - EXERCISE REQUIREMENTS

EXERCISE TYPE	EXERCISE CHARACTERISTICS
Facility/QI Notification	• Conducted quarterly (one per year must be performed during non-business hours • The facility initiates mock spill notification to QI • The Qualified Individual documents time/date of notification, name, and phone number of individual contacted • Document using **FIGURE A.1-3** or comparable form
Emergency Procedures	• Optional exercise for EPA regulated facilities • Review of facility procedures established to mitigate or prevent any discharge or substantial threat of a discharge from operational activities • An emergency procedures conducted unannounced would satisfy the facilities requirement for the annual unannounced

Spill Management Teams / Table Top Exercise	
IMT (Incident Management Team)	• Conducted annually • Tests IMT's (SMT) 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 using **FIGURE A.1-4** or comparable form
Corporate Incident Management Team (If Applicable)	• Conducted annually • Conduct one IMT (spill management exercise or table top) on the core response management procedures • Ensure familiarization with each response plan they are responsible for • Document using **FIGURE A.1-4** or comparable form
Mutual aid SMT (If Applicable)	• Conducted annually • Conduct one IMT (spill management exercise or table top) on the plan holder (or industry type) response management procedures • One or more of the plan holder organization must participate • Ensure familiarization with each response plan they are responsible for • Document using **FIGURE A.1-4** or comparable form
Equipment Deployment Exercise: **Note:** Where OSRO and Company owned equipment are cited, both type of equipment exercises are incorporated.	

Company Owned	• Facilities with company owned and operated equipment:
	  • Semi-annually deploy the:
	  • Minimum amount of equipment for deployment as described in PREP (1,000 ft of each tye of boom and one each type of skimming system), or
	  • Amount of Equipment necessary to respond to an average most probable at the facility, which ever is less
	• Pipelines with operator owned and operated equipment:
	  • Annually deploy the:
	  • Minimum amount of equipment for deployment as described in PREP (1,000 ft of each tye of boom and one each type of skimming system), or
	  • Amount of Equipment necessary to respond to an average most probable at the facility, which ever is less
	• Document using **FIGURE A.1-5** or comparable form

FIGURE A.1-1 - EXERCISE REQUIREMENTS, CONTINUED

EXERCISE TYPE	EXERCISE CHARACTERISTICS
OSRO Owned (Oil Spill Removal Organization)	• Annually for facilities and pipelines, • Company to acquire documentation from the OSRO demonstrating the completion of exercise requirements
Co-op	• OSRO based Co-ops to follow OSRO deployment requirements • Facility equipment and personnel Co-op considered an OSRO in PREP and follow the OSRO deployment requirements for facilities • Co-op personnel responsible for deploying response equipment to be involved in a training program that prepares tem for operating the response equipment
Unannounced (Internal)	• 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 • Document using **FIGURE A.1-4** or comparable form
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
Credit for Spill Response	• Credit may be taken for internal exercises in response to actual spills • Spill response must be evaluated • Determination for credit made on which exercise were completed during the spill response. • Determination should be based on whether the response would meet the objectives of the exercise listed in PREP • Credit for Unannounced should be evaluated • Document in accordance with appropriate Exercise documentation form

Records of Drills	• Company will maintain exercise records for five years following completion of each exercise • Records will be maintained in the Training/Exercise tool in the electronic interface • Company will verify appropriate records are kept for each spill response contractor listed in Plan as required by PREP guidelines (annual equipment deployment drill, triennial unannounced drill, etc.)

FIGURE A.1-2 - PREP RESPONSE PLAN CORE COMPONENTS

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

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

FIGURE A.1-3 - QUALIFIED INDIVIDUAL NOTIFICATION EXERCISE

1. Date(s) QI Exercise performed:			
2. Exercise Name:			
☐ QI Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill			
Exercised frequency:			
☐ Quarter ☐ 1st ☐ 2nd ☐ 3rd ☐ 4th			
3. Description of Notification Exercise / Event:			
a. Location (Facility, Pipeline, Zones):			
b. Time initiated:			
c. Time ended:			
d. Notification Procedure:			
4. Notification results:			
Person performing exercise:	Method of contact: Telephone, Pager, Radio, other		
Qualified Individual Name	**Time Notified**	**Time Responded**	**Method of Contact**

5. Exercise objective met (contacted made between the facility and qualified individual(s))? _Yes___No
   If no, Lessons learned must be completed.

6. Lessons learned description and persons responsible for follow-up:

Description of Lessons Learned	Responsible corrective measures	Time Table for corrective measures

Print Name:	Signature:
Position:	

FIGURE A.1-4 - SPILL / EXERCISE DOCUMENTATION FORM

1. Date(s) performed:
2. Exercise Name:

Type of Exercise ☐ Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill

Exercise, credit for:

☐ Emergency Procedures ☐ Spill Management Team ☐ Tabletop

Exercise, frequency:

☐ Quarter (☐ 1st ☐ 2nd ☐ 3rd ☐ 4th) ☐ Semi-Annual ☐ Annual

Response plan discharge scenario used:

☐ Average most probable ☐ Maximum most probable ☐ Worst case		
3. Description of Exercise / Event:		
a. Location:		
b. Time initiated:		
c. Time ended:		
d. Product:		
e. How discovered:		
f. Quantity released :		
g. Affected area(s):		
h. Injuries or Hazards:		
i. Weather:		
4. **Plan Objectives** exercised (may be exercised at different times):		
a. Spill Management Team's Knowledge of Oil-Spill Response Plan		
	Yes	**No**
General Order of Response described in the Plan:		
• Discovery and Assessment (Spill Detection) Phase	☐	☐
• Detection methods identified	☐	☐
• Emergency Type (Event “Class”) identified	☐	☐
• Spill assessment (classifying discharge size & course of action) identified	☐	☐
Security and Response Phases		
• Initial Response	☐	☐
• General site assessment, detail to safety, environment, & public	☐	☐
• Elimination of ignition sources	☐	☐
• Isolation / Confirmation Source was stopped	☐	☐
• Establish Incident Command / field command post (ICS Structure)	☐	☐
• Briefing Meeting, (incident description, objectives, resources needed)	☐	☐
• Develop Site Safety Plan (including evacuations of necessary)	☐	☐

Established Work Zones and Perimeter Security	☐	☐
• Initial Incident reports completed (company forms or others e.g. ICS 201)	☐	☐

FIGURE A.1-4 - SPILL / EXERCISE DOCUMENTATION FORM, CONTINUED

4. **Plan Objectives** exercised (may be exercised at different times), Continued:

a. Spill Management Team's Knowledge of Oil-Spill Response Plan, Continued

	Yes	No
• Sustained Response	☐	☐
• Objectives and priorities established with responsibilities assigned	☐	☐
• ICS Center established; transitioned from initial response activities	☐	☐
• IAP – Incident Action Plan, (Short and Long Range tactical objectives)	☐	☐
• Identify / provide clean-up and support resources and services	☐	☐
• Monitor cost; provide accounting, procurement, time recording	☐	☐
• Documentation of event to be recorded and / or maintained	☐	☐
• Coordinate Federal State and Local entities into ICS/ UCS units	☐	☐
• Containment and response methods established	☐	☐
• Closure / Termination Phases	☐	☐
• Closure plan / checklist to finalize ongoing clean-up and removal activities	☐	☐
• Demobilization plan for demobilizing resources	☐	☐
• Develop IAP (Incident Action Plan) for any follow-up actions	☐	☐
• Conduct a post incident review & document (e.g. post incident review form)	☐	☐
b. Proper Notification:	☐	☐
• Internal notifications completed (attach any available logs)		

	☐	☐
• Qualified Individual contacted and responded (attached OI Drill form)	☐	☐
• External (Agency) Notifications completed (attach any available logs) ▪ Federal Agencies (e.g. NRC, USCG, DOT) ▪ Agency _____ Date / Time _____, NRC #: _____, ▪ Agency _____ Date / Time _____, NRC #: _____, ▪ State (e.g. Texas General Land Office / Report Number) ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Local (e.g. LEPC, Sheriff, 911) ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____, ▪ Agency _____ Date / Time _____, Report #: _____,	☐	☐
c. Communication systems:	☐	☐
Establish Primary/Secondary Communication System?	☐	☐
☐ Primary: (Cellular Phone ☐ Two Way Radio ☐ Land Telephone Line ☐) ☐ Secondary: (Cellular Phone ☐ Two Way Radio ☐ Land Telephoen Line ☐) ☐ Other:		

FIGURE A.1-4 - SPILL / EXERCISE DOCUMENTATION FORM, CONTINUED

d. Ability to Access Contracted Oil Spill Removal Organizations (OSROs):	☐	☐
Were OSRO identified and contacted?	☐	☐
Who contacted (Name of individual at OSRO):		
When contacted:		

Response time projection for deployment:		
Type and amount of equipment requested:		
e. Ability to Coordinate Response with On-Scene Coordinator, and applicable Agencies:	☐	☐
Was regulatory on-scene coordinator(s) contacted?	☐	☐
List person and agency represented:		
f. Ability to Access Sensitive Site & Resource Information in the Area Contingency Plan:	☐	☐
Was Area Contingency Plan available in the exercise?	☐	☐
Were environmental sensitive environments identified in the ACP?	☐	☐
Was spill response equipment identified in the ACP?	☐	☐

Identify which of the 15 core components of your response plan were exercised:

Organizational Design components:

☐ Notifications	☐ Staff Mobilization
☐ Ability to operate within the response management system described in the plan	

Operational Response components:

☐ Discharge control	☐ Assessment of discharge
☐ Containment of the discharge	☐ Recovery of spilled material
☐ Protection of sensitive areas	☐ Disposal of recovered material and contaminated debris

Response support components:

☐ Communications	☐ Transportation
☐ Personnel support	☐ Equipment maintenance
☐ Procurement	☐ Documentation

5. Lessons learned description and persons responsible for follow-up:

Description of Lessons Learned	Responsible corrective measures	Time Table for corrective measures

Print Name:	Signature:	
Position:		

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FIGURE A.1-5 - EQUIPMENT TESTING AND DEPLOYMENT EXERCISE FORM

1. Date(s) performed:
2. Exercise Name:
Type of Equipment Deployment Exercise:
☐ Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill

EQUIPMENT DEPLOYMENT EXERCISE	
Equipment deployed is	☐ Company owned ☐ OSRO owned ☐ Both
Deployment of equipment was	☐ Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill
If facility - owned, was Equipment deployed sufficient for average most probable release?	☐ yes ☐ no ☐ na
If OSRO - owned, was Equipment deployed a representative sample (at least 1000 ft boom and at least on type of skimmer)?	☐ yes ☐ no ☐ na
Was equipment deployed in its intended operating environment?	☐ yes ☐ no ☐ na
Are facility personnel responsible for response operations involved in a comprehensive training program?	☐ yes ☐ no ☐ na
Is facility response equipment involved in a comprehensive maintenance program	☐ yes ☐ no ☐ na
Date of equipment deployment:	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies listed for equipment deployed (as listed in ACP or responders plan)	
Was all deployed equipment operational? (If	

no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	
OSRO Certification (if applicable)	

FIGURE A.1-5 - EQUIPMENT TESTING AND DEPLOYMENT EXERCISE FORM, CONTINUED

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	

Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

2. Lessons learned description and persons responsible for follow-up:

Description of Lessons Learned	Responsible corrective measures	Time Table for corrective measures
Print Name:	Signature:	
Position:		

FIGURE A.1-6 - INCIDENT MANAGEMENT TEAM STAFFING EXERCISE FORM

Company:	Date:
Exercise Name:	Exercise Type:

* Duties Must include: IC, Ops. Logistics, Planning Admin. Section Chiefs, Safety, Public Affairs, Liaison, etc.
Note: This is an optional form which can be used form staffing documentation in a simulated exercise.

ACTIVITY INFORMATION (Duties*)	Name	Time Contacted	Time to Respond	Comments

STAFF MOBILIZATION ACTIVITY	SUMMARY
Evaluation: *(Able to assemble the spill response organization identified in the responder plan and the ACP for the scenario?)*	
Changes to be Implemented	
Time Table for Implementation	
Print Name:	Signature:
Position:	

A.2 TRAINING PROGRAM

FIGURE A.2-1 provides training requirements for spill responders. **FIGURE A.2-2** provides the program matrix.

Training records for company personnel will be maintained per company policy.

FIGURE A.2-1 - TRAINING REQUIREMENTS

TRAINING TYPE	TRAINING CHARACTERISTICS
Training in use of spill response plan	• Company employees will be trained to properly report and respond to spills. • Appropriate company employees are trained and drilled on the Plan.
OSHA training requirements	• Company responders designated in Plan will have 24 hours of initial spill response training (Haz Mat Technician level) with annual refresher. • Contract responders will be required to meet OSHA

	requirements under 29 CFR 1910.120
Training for casual laborers or volunteers	• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training
Wildlife	• Only appropriately trained and approved wildlife handlers, as found in the specialized support services section of this Plan, will be used to treat oiled wildlife
Training documentation and record maintenance	• Training records will be maintained in accordance with the Company Records Retention Schedule.
Facility Personnel	• Are trained to enable them to respond effectively to hazardous waste emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

FIGURE A.2-2 - PREP TRAINING PROGRAM MATRIX

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

Facility personnel responsibilities and procedures for use of facility equipment which may be available to mitigate or prevent an oil discharge	x	x	x
Operational capabilities of the contracted OSRO's to respond small, medium, and large discharges	x	x	x
Responsibilities and authority of the Qualified Individual (QI) as described in the Spill Response Plan and Company response organization	x	x	x
The organization structure that will be used to manage the response actions including: • Command and control • Public information • Safety • Liaison with government agencies • Spill response operations • Planning • Logistics support • Finance	x	x	x
The responsibilities and duties of each Incident Management Team (IMT) within the organization structure	x	x	
The drill and exercise program to meet federal and state regulations as required under Oil Pollution Act of 1990 (OPA 90)	x	x	x
The role of the QI in the post discharge review of the Plan to evaluate and validate its effectiveness	x		
The Area Contingency Plan (ACP) for the area in which the facility is located	x	x	x
The National Contingency Plan (NCP)	x	x	x
Roles and responsibilities of federal and state agencies in pollution response	x	x	x

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

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	INCIDENT MANAGEMENT TEAM (IMT)	FACILITY PERSONNEL
Available response resources identified in the Plan	x	x	

Contracting and ordering procedures to acquire OSRO resources identified in the Plan	x	x	
OSHA requirements for worker health and safety (29 CFR 1910.120)	x	x	x
Incident Command System/Unified Command System	x	x	
Public affairs	x	x	
Crisis management	x	x	
Procedures for obtaining approval for dispersant use or insitu burning of the spill	x		
Oil spill trajectory analyses	x		
Sensitive biological areas	x	x	
This training procedure as described in the Plan for members of the IMT		x	
Procedures for the post discharge review of the plan to evaluate and validate its effectiveness		x	
Basic information on spill operations and oil spill clean-up technology including: • Oil containment • Oil recovery methods and devices • Equipment limitations and uses • Shoreline cleanup and protection • Spill trajectory analysis • Use of dispersants, insitu burning, bioremediation • Waste storage and disposal considerations		x	
Hazard recognition and evaluation		x	
Site safety and security procedures		x	
Personnel management, as applicable to designated job responsibilities		x	
Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities		x	x
Specific procedures to shut down effected operations			x
Procedures to follow in the event of discharge, potential discharge, or emergency involving the following equipment or scenarios: • Tank overfill			x

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			
QI's name and how to contact him or her			x

APPENDIX B Last revised: April 28, 2011

COOPERATIVE AND CONTRACTOR DOCUMENTS

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B.1 COOPERATIVES AND CONTRACTORS

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

B.1.1 OSRO Classification

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

The following is a listing of the USCG classified OSROs that may respond to incidents for areas listed in this Plan.

COMPANY / CONTRACTOR	APPLICABLE COTP ZONE (S)	USCG CLASSIFICATIONS	RESPONSE TIME
Eagle SWS, (San Antonio) 414 FM 1103 Cibolo TX 78108	CORPUS CHRISTI	Facilities: MM ✓, W1 ✓, W2 ✓, W3 ✓; Vessels: MM ✓, W1 ✓, W2 ✓, W3 ✓ River/Canal ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Inland Open Ocean Offshore Nearshore Great Lakes	1 hours
TAS Environmental Services, LP (San Antonio) 14350 Lookout Road San Antonio Texas 78233	HOUSTON-GALVESTON	Facilities: MM ✓, W1 ✓, W2 ✓, W3 ✓; Vessels: MM ✓, W1 ✓, W2 ✓, W3 ✓ River/Canal ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Inland ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Open Ocean ✓ ✓ Offshore ✓ ✓ Nearshore ✓ ✓ Great Lakes	1 hours
Miller Environmental Services, Inc. 600 Flato Road Corpus Christi TX 78405	CORPUS CHRISTI	Facilities: MM ✓, W1 ✓, W2 ✓, W3 ✓; Vessels: MM ✓, W1 ✓, W2 ✓, W3 ✓ River/Canal ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Inland ✓ ✓ ✓ ✓ ✓ ✓ Open Ocean Offshore Nearshore	5 hours

		Great Lakes								

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

FIGURE 7.1-1 provides both OSRO and non-OSRO summarized equipment lists and response times.

FIGURE B.1-1 provides evidence of contracts with OSROs and equipment lists for contractors without USCG classification.

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

- **Eagle SWS, (San Antonio), Cibolo, TX**
- **TAS Environmental Services, LP (San Antonio), San Antonio, Texas**
- **Miller Environmental Services, Inc., Corpus Christi, TX**

FIGURE B.1-2 - EQUIPMENT LISTS

- **Eagle SWS, (San Antonio), Cibolo, TX**
- **TAS Environmental Services, LP (San Antonio), San Antonio, Texas**
- **Miller Environmental Services, Inc., Corpus Christi, TX**

FIGURE B.1-3 - DRILL DEPLOYMENT EXERICSES

- **Eagle SWS, (San Antonio), Cibolo, TX**
- **TAS Environmental Services, LP (San Antonio), San Antonio, Texas**
- **Miller Environmental Services, Inc., Corpus Christi, TX**

APPENDIX C
SPCC PLANS

Last revised: March 22, 2011

FIGURE C-1 - PROFESSIONAL ENGINEER CERTIFICATION

FIGURE C-1 – PROFESSIONAL ENGINEER CERTIFICATION

40 CFR, Part 112.3(d) Professional Engineer Certification

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

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

Printed Name of Registered Professional Engineer: Sara A. Hutson

Signature of Registered Professional Engineer:

Sara A. Hutson

Date: 3/17/2010

Registration No. 74468

Seal:

Note: Secondary containment capacities were provided by FHR and not independently verified.

FIGURE C-2 - MANAGEMENT APPROVAL AND REVIEW

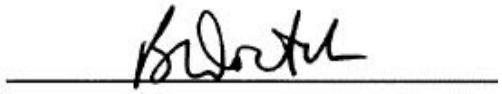
I hereby approve the contents of the facility's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) and have the authority to commit the necessary resources to implement the SPCC Plan, as set forth in this document, in accordance with the federal requirements of 40 CFR Part 112.			
Name:	Barry Dortch	**Signature:**	
Title:	Terminal Manager	**Date:**	05/14/2007

FIGURE C-3 - RECORD OF REVIEWS

RECORD OF REVIEWS					
Date of Review[1]		Will Plan Need Amendment?[2]	Reviewer's Signature[3]	Reason for Amendment[4]	Date of Amendment (or N/A)
Full	Partial	Yes / No			
April 2001		No	James Trevino	N/A	N/A
June 2002		No	James Trevino	N/A	N/A
May 2003		Yes	James Trevino	Re-certified SPCC Plan Updates in accordance with new Rules in effect 16 August 2002	May 2003
October 2004		No	Shawnna Poor	Installed Volume IV of the ICP to reflect Flint Hills Resources as Owner / Operator of all product terminals in South Texas with their own Corresponding Volume of the ICP. Completed annual review of ICP. On October 1, 2004, Operatorship of this terminal was transferred from Koch Pipeline Company, L.P. to the owner of the asset, Flint Hills Resources, LP. Management personnel for this terminal also transferred at this time. Therefore, management approval of the Spill Prevention Control and Countermeasures plan for this facility is still valid under Flint Hills Resources, LP. This transition resulted in no material changes to the facility requiring a plan amendment at this time not withstanding other required	N/A

				amendments.	
June 2007		No	Scott Peters	N/A	N/A
March 2010		Yes	Sara Hutson, P.E.	Added ethanol and additive unloading area data, transmix and vacuum truck load/unload area data, inspection requirements, regulatory references, drainage changes, and other miscellaneous revisions.	March 2010

[1] A full review of the plan must be performed at least once every 5 years.

[2] The SPCC plan must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. Examples include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures; or more effective prevention and control technology if the technology has been field-proven.

[3] Reviewer's signature indicates that he/she has completed review and evaluation of the SPCC plan for San Antonio on the date indicated and will or will not amend the plan as a result, as indicated.

[4] Briefly describe reasons for plan amendment. These may include one or more of the reasons in footnote 2, above, administrative changes such as updates to names or phone numbers, regulatory changes, or changes in company policies.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN

FACILITY INFORMATION			
Name of Facility:	San Antonio	**Type of Facility:**	Onshore/Non Production
Location of Facility:	498 Pop Gunn Drive San Antonio,TX 78219	**Name & Address of Owner or Operator:**	Flint Hills Resources Corpus Christi, LLC 498 Pop Gunn Drive San Antonio , TX 78219
Latitude/ Longitude:	(b) (7)(F), (b) (3)	**Designated Personnel Accountable for Oil Spill Prevention at the Facility:**	Barry Dortch
General Facility Description:	The facility is a bulk fuel storage and distribution terminal. The materials handled at the terminal include various grades and types of gasoline, ethanol, diesel fuel, and fuel additives.		

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.7
(a) GENERAL REQUIREMENTS
(1) Include a discussion of your facilities conformance with the requirements listed in this part
• The specific requirements are detailed in bulleted responses below.
(2) Comply with all applicable requirements listed in this part. Your Plan may deviate from some requirements if you provide additional protection or explanation
• Requirements are addressed below. No deviations are addressed in this plan.
(3) You must also address in your plan:
• The facility is an Onshore/Non-Production facility; refer to FIGURE 1-5.
i.The type of oil in each container and its storage capacity
• Refer to FIGURE C-5.
ii.Discharge prevention measures
• Entire plan.
iii.Discharge or drainage controls
• Refer to FIGURE C-4, 40 CFR 112.8 (b).
iv.Countermeasures for discharge discovery, response and clean-up
• Refer to SECTION 2.
v.Methods of disposal
• Refer to SECTION 7.4.
vi.Contact list and phone numbers
• Refer to SECTION 3.
(4) Unless you have submitted a response plan, provide information and procedures to report a discharge
• A response plan has been submitted for this facility.
(5) Unless you have submitted a response plan, describe procedures you will use when a discharge occurs
• A reponse plan has been submitted for this facility.
(b) PREDICTION OF THE DIRECTION, RATE OF FLOW, AND TOTAL QUANTITY OF OIL WHICH COULD BE DISCHARGED FROM THE FACILITY AS A RESULT OF EACH TYPE OF MAJOR EQUIPMENT FAILURE
• Refer to FIGURE C-5.
(c) PROVIDE APPROPRIATE CONTAINMENT
• Refer to FIGURE C-5.
(d) CONTINGENCY PLANNING
(1) An oil spill contingency plan following the provisions of part 109 of this chapter
• The facility has appropriate containment structures to prevent discharged oil from reaching a navigable watercourse, as required by 40 CFR 112.7(c). Therefore, no contingency plan is required. The facility has submitted to the USEPA a Facility Response Plan.
(e) INSPECTIONS, TESTS, AND RECORDS
• Example inspection Procedures are contained in FIGURE C-11.
• The inspection program is intended to provide a mechanism to prevent and detect system malfunctions, equipment deterioration and operator errors.
• The Secondary Containment Drainage Log an electronic form similar FIGURE C-13 is used to document containment draining events.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.7	
(e) INSPECTIONS, TESTS, AND RECORDS	
	• Aboveground storage tanks, associated piping, and surrounding secondary containment areas are inspected routinely by the terminal manager or designated personnel.
	• Tank gauging is automatically conducted on a daily basis to monitor inventories.
	• Tanks are inspected per DOT 49 CFR 195, and/or API 653 requirements, as applicable.
	• Completed inspection logs will be maintained per the records retention policy.
(f) PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES	
(1) PERSONNEL TRAINING	
	• All terminal personnel receive the appropriate 24-hour Occupational Safety and Health Administration (OSHA) hazardous materials training course required by 29 CFR 1910.120(e). They also participate in annual 8-hour refresher hazardous material courses.
	• Through FHR's Training Program, employees involved with oil / product transfer operations are trained to reduce the occurrence of operator-related spills and the severity of impacts from spills.
	• Technicians receive training in facility operations, hazardous materials, spill response, and participate in drills to practice spill response procedures.
	• Training records shall be placed in the appropriate training files per the records retention policy.
	• Terminal personnel participate in SPCC Plan reviews on an annual basis. This training course may consist of simulated spill responses, spill response techniques, and instruction on the contents and implementation of the SPCC Plan.
	• All drivers loading or unloading at the terminal are properly trained prior to operating on site.
(2) DESIGNATED PERSON	
	• The terminal manager is the responsible person for implementation of this SPCC plan.
(3) SPILL PREVENTION BRIEFINGS	
	• FHR may choose to have discharge prevention meetings after releases have occurred, or will update personnel on changes in the SPCC.
	• During meetings after a release, discussions will include how the Plan was implemented and if any changes should be made.
	• Discharge prevention meeting records will be completed and kept per the records retention policy.

(b) (7)(F), (b) (3)

[redacted]

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.7
(b) (7)(F), (b) (3) [redacted]
(h) FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
(1) TRANSFER AREA DRAINAGE
• **Loading Rack**
• The terminal has one partially enclosed truck loading rack which is surrounded by concrete curbing and covered to minimize storm water contact.
• The loading rack is equipped with a rack containment system consisting of sloped concrete slab and curbing, floor drains, and an emergency overfill protection (EOP) vessel with a capacity of 8000 gallons.
• The EOP vessel is manually pumped to the transmix tank or can be pumped to a vacuum truck or other appropriate container.
• Potential spills could occur from swing arm connections, fill line ruptures, or compartment overfilling. Spills from these operations would be contained within the loading rack concrete area and drain to the containment system.
• **Ethanol Unloading**
• Ethanol unloading is conducted at a dedicated unloading rack which is constructed of gravel over a claymax liner. The area is sloped to drain to the west to a 18,000-gal containment impoundment, which is also lined with claymax.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.7
(h) FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
(1) TRANSFER AREA DRAINAGE
• Drivers place drip pans beneath hose connections prior to the start of unloading to catch any drips. Pans are emptied, if necessary, into a collection drum after unloading is complete

	and hoses are disconnected.
	• **Additive Unloading**
	• Additive is unloading in a dedicated unloading area in the north of the terminal. The unloading area is concrete sloped to a center drain. The drain discharges to an underground emergency spill collection vessel with a capacity of 2500 gal. Additional containment is provided north of the unloading area by a clay-lined impoundment trench. Unloading in this area is attended by an FHR employee.
	• **Transmix Loading/Vacuum Truck Unloading**
	• Two connections are available south of the tank farm, one to load transmix and/or water out of Tank 110 and another to unload vacuum trucks into Tank 110. The area is curbed to retain spills. Drip pans are placed under hoses prior to loading/unloading to collect drips.
(2) INTERLOCKED WARNING LIGHT OR PHYSICAL BARRIER	
	• Tank trucks are required to have brake systems or other means of locking the brakes or securing trailer in place while loading.
	• Each loading bay is equipped with a overfill protection system (an automatic pump shutdown switch and a truck grounding line), vapor recovery system, truck brake lockout, and a spill collection system.
	• Prior to filling the truck, the driver must attach the overfill protection system to the truck.
	• The overfill protection system monitors the fuel levels in the receiving tank truck and serves as a grounding device.
	• The level monitor inside the tank truck triggers the overfill protection system to automatically shut down the transfer pump when maximum capacity is reached in the truck compartment.
	• Each loading bay is equipped with one emergency shutdown button.
	• When a shutdown button is pushed at the loading rack, the entire loading rack is shutdown and an alarm is lit in the office.
	• When a shutdown button is pushed in the pump station, pipeline operations are shutdown and a notification of an alarm condition is automatically sent to the control center in Wichita.
	• The main chamber of the emergency overfill protection vessel is equipped with a high-level alarm system and audible alarm that warns terminal personnel of a high-level condition.
	• Only authorized truck drivers are allowed to load product and all have undergone training, including procedures for proper loading.
	• The truck loading rack is fully automated, and authorized tank truck drivers are trained and required to remain in the vicinity during loading.
	• Transfer of product from the storage tanks to the loading rack is electronically controlled by an identification card system.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.7
(h) FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
(3) TRUCK DRAIN / OUTLET EXAMINATION
• Prior to loading/unloading and departure, the driver of the tank truck is required to closely examine the lower most drain and other outlets for leakage and to ensure they are tightened to prevent discharge during transit.
• A sign is provided at each loading rack bay and unloading area warning the truck driver not to leave prior to disconnecting the transfer lines.
(i) BRITTLE FRACTURE EVALUATION REQUIREMENTS
• If, by regular inspections or otherwise, it is determined that the integrity of the containers

or auxiliary equipment is or may have been compromised, due to repairs, alterations, reconstruction or a change in service, the problem shall be evaluated by the division engineer for risk of brittle fracture or other catastrophe, and as necessary, take appropriate action.
(j) STATE DISCHARGE PREVENTION REQUIREMENTS
• This SPCC Plan has been prepared in compliance with EPA requirements found in 40 CFR 112, Oil Pollution Prevention, and with TCEQ requirements contained in 30 TAC 327, Spill Prevention and Control. Because the San Antonio Terminal is not a waterfront or offshore facility per their definitions, the General Land Office (GLO) requirements in 31 TAC Part 1, Chapter 19 do not apply to this terminal.
(k) QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT
• Where secondary containment is not provided, qualified oil-filled operational equipment (i.e. transformers, etc.) are inspected on an established frequency to detect equipment failure or a discharges and the inspections are documented.
(1) Qualification Criteria--Reportable Discharge History
• This inspection method will only be applied to equipment that meets the qualifications of this section.
(2) Alternative Requirements to General Secondary Containment
•
(i) Facility Procedures for Inspections / Monitoring
• Where secondary containment is not provided, qualified oil-filled operational equipment (i.e. transformers, etc.) are inspected on an established frequency to detect equipment failure or a discharges and the inspections are documented.
(ii) Unless you have submitted a response plan under Â§112.20, provide Contingency Planning:
• Not required as the facility has submitted a response plan under Â§112.20.
(A) An oil spill contingency plan following the provisions of part 109 of this chapter.
• Not required as the facility has submitted a response plan under Â§112.20.
(B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.
• Not required as the facility has submitted a response plan under Â§112.20.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.8
(a)GENERAL REQUIREMENTS
• The specific requirements are detailed in bulleted responses below.
(b) FACILITY DRAINAGE
(1) DRAINAGE FROM DIKED AREAS
• Earthen-diked areas are drained by and only while terminal personnel are onsite.
• If the secondary containment failed or the drain valve in the southeast corner were manually released to discharge storm water following a heavy precipitation event, drainage would flow south through the station property to city of San Antonio storm drains.
(2) DRAIN VALVES AND DROP PIPES
• The dike drainage valves are maintained in a closed and secured position until it is necessary to drain excess rainwater from inside the containment area.
• The main tank farm has a gate valve drain in the southeast corner of the secondary containment. The discharge pipe is connected to a pump. When the quality of the water has been determined to be suitable for discharge, the pump is turned on. Water is pumped from

the southeast corner of the tank farm to the drainage ditch outside the terminal property.
(3) FACILITY DRAINAGE SYSTEM FROM UNDIKED AREAS
• Surface drainage from the southern portion of the terminal, including the driveways, terminal office and parking areas drains south into the south adjacent vacant property.
• Drainage from the vacant northwest corner of the terminal flows northwest toward Pop Gunn Drive.
(4) DIVERSION SYSTEM
• Not Applicable
(5) TREATED DRAINAGE WATERS
• Not Applicable
(c) BULK STORAGE CONTAINERS
(1) CONTAINER CONSTRUCTION AND MATERIALS
• The material and construction of the oil storage containers are compatible with the materials stored and storage conditions.
• Refer to FIGURE C-5, Potential Spill Sources.
(2) SECONDARY CONTAINMENT
• All secondary confinement dikes are designed to hold the entire contents of the largest tank within the containment tanks with sufficient additional capacity to allow for a 25-year 24-hour precipitation event.
• The bulk storage tank diked areas consist mainly of layers of organic clays & are sufficiently impervious to allow for retention of spilled material.
• Secondary Containment volume is listed in FIGURE C-5, Potential spill sources.
(3) RAINWATER DRAINAGE
• An electronic based Storm Water Discharge Log entry will be made to reflect the circumstances which required a release of excess precipitation, what area was drained, which individual was responsible for determining the water quality and by what method, when the release was initiated, when the release was terminated, and by whom.
• Prior to the release of any water from the terminal containment areas, the surface of the water is visually inspected to determine if an oily sheen or other indication of oil is present in discernible quantities.
• Should there be any question about the quality of the water present, the Terminal Manager, based upon his professional judgment will (a) authorize release, (b) leave the water to evaporate as appropriate, and, if appropriate, take corrective action on the residual petroleum product; (c) analytically test a representative sample of the water for suspect pollutants, or (d) arrange for transport off-site for proper treatment and disposal.
• The drainage system in the containment areas is manually operated and used after heavy precipitation events. These drains are secured at all times when not in use.
(4) BURIED METALLIC STORAGE TANKS
• The terminal has six (6) underground storage tanks (USTs) for the storage of fuel additives that are 12,000 gallons each. The USTs are subject to and meet the requirements of the Texas UST program found in 30 TAC 334, hence each of the USTs is double walled with interstitial monitoring for potential leaks and coated in fiberglass for corrosion protection. The location of the tanks are identified on the facility plot plan.
• The terminal has an Emergency Overfill Protection (EOP) vessel, which is an 8,000-gallon horizontal underground containment vessel of double-wall construction. The outside of the vessel is fiberglass coated for corrosion protection. The outer wall of the double-wall construction of the EOP provides secondary containment for a release from the tank primary vessel. The EOP is excluded from regulation as an underground storage tank (UST) per 30 TAC 334.4(a)4, since it is used solely for the temporary storage or containment of regulated substances resulting from a leak, spill, overfill, or other unplanned release, and the regulated substances are routinely removed within 48 hours of the discovery of the release.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.8
(c) BULK STORAGE CONTAINERS
(4) BURIED METALLIC STORAGE TANKS
• The additive area also has an underground emergency spill protection vessel which is an 2500-gal horizontal vessel of double-wall construction. This vessel is also excluded from the UST rules due to its use and operation.
• A pipeline sump is part of the transportation-related pipeline equipment at the station and it is included in the Cathodic protection system operating at the terminal.
(5) PARTIALLY BURIED METALLIC STORAGE TANKS
• There are no partially buried metallic storage containers at the terminal.
(6) ABOVEGROUND CONTAINERS
• Visual tank inspections are performed on a monthly basis by FHR personnel with appropriate qualifications to assess tank integrity, and deficiencies are noted and addressed. This visual inspection includes, but is not limited to, the following items: * Evidence of leaks or spills * Corrosion deterioration (for non-insulated tanks) * Foundation deterioration * Tank auxiliary equipment (valves, piping and pumps) * Containment structures
• Bulk storage tank integrity testing is conducted on an established schedule by personnel with appropriate qualifications in accordance with appropriate industry standards including applicable sections of API and STI, as appropriate. At a minimum the testing will include one of the following types of testing: (i) hydrostatic, (ii) magnetic particle, (ii) penetrant-dye, (iv) ultrasonic (v) radiographic, (vi) acoustic emission or (vii) laser. The schedule is based on tank size, configuration, design and previous inspection results. Test results are kept under usual and customary business practices. The tank integrity testing program outlining the testing basis and schedule for each tank is maintained at FHR corporate offices in Wichita, Kansas.
• Small oil storage containers (e.g. 55-gallon drums, totes and elevated tanks) that do not come in contact with the ground, and which are visually inspected on all sides at least monthly, are not included in the tank integrity testing program.
(7) INTERNAL HEATING COILS
• None of the tanks at this terminal are outfitted with internal heating coils.
(b) (7)(F), (b) (3) [redacted]

	• Nondestructive tank testing techniques that may be used during the 10-year inspections include ultrasonic methods for testing wall thickness or other integrity testing methods such as vacuum box, magnetic particle, and magnetic flux leakage.
(9) FACILITY EFFLUENTS	
	• The station does not generate effluent as part of normal operations.
	• If necessary as a result of a spill, spilled material and/or contaminated storm water accumulation will be sampled and analyzed prior to disposal in accordance with all applicable local, state and federal regulations.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.8	
(c) BULK STORAGE CONTAINERS	
(10) VISIBLE OIL LEAKS	
	• Terminal personnel have been trained and are aware of the need to promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, and bolts.
	• Accumulation of oil in diked areas will also be addressed promptly and proper notifications made.
	• Pad mounted transformers with dielectric fluid are located in the pump station and terminal. The transformers are periodically visually inspected for signs of leaks.
(11) MOBILE/PORTABLE STORAGE CONTAINERS	
	• There are no mobile/portable oil storage containers permanently on site, other than trucks receiving or delivering products for transportation.
	• Should there be a need to bring mobile or portable oil storage containers on site in the future, they will be stored within existing containment or have an adequate secondary containment system to contain a possible release of oil.
	• Tank trucks filled with oil are in an undiked area while driving from the loading rack to the exit gate, from the gate to the ethanol or additive unloading areas, and while parked to obtain Bills of Lading. Equivalent environmental protection for the trucks is provided via vapor tightness testing (completed annually), internal inspections (completed every five years), and pressure tests (completed every five years). Documentation of completed inspections for trailers is maintained by the trailer owner.
(d) FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESSES	
(1) BURIED PIPING INSTALLATIONS	
	• The piping from the tank farm to the loading rack is aboveground.
	• Buried pipelines are wrapped and/or coated to reduce corrosion.
	• If a section of buried line is exposed for any reason, FHR will carefully inspect it for deterioration. If FHR finds corrosion damage, appropriate FHR engineering will undertake additional examination and corrective action as indicated by the magnitude of the damage.
	• Although the terminal receives oil products by pipeline, the pipeline is not included as part of this SPCC Plan. Koch Pipeline Company, LP operates and maintains the inbound and outbound underground piping. The pipeline is also protected from corrosion by an impressed current Cathodic protection system.
	• Piping that is newly installed, relocated or replaced will be subjected to integrity and leak testing prior to being placed into service.
(2) PIPELINE OUT OF SERVICE	
	• If out of service piping is not removed or if a pipeline is not in service or is in standby service for an extended period of time, the piping or pipeline will be emptied, capped or blank flanged, and marked with the words "out of service", and marked as to its origin
	• Product is removed from inactive or out-of service piping. Piping is properly secured and occasionally abandoned in place

(3) PIPING SUPPORTS
• Pipe supports are of the "T" or "H" design, set in concrete, with the appropriate sizing for the pipe to be supported.
• Supports are observed during facility walk-throughs for signs of corrosion and/or vibration-induced damage.
(4) ABOVEGROUND VALVES AND PIPELINES
• Oil service valves, fittings, and pipes are examined in the course of daily operations for leaks and are periodically monitored during product transfers, though these monitorings may not be documented. Additionally, the terminal conducts a monthly audio, visual, and olfactory (AVO) inspection on aboveground piping.
• Vehicles entering the terminal are warned of aboveground piping by signs posted at the terminal.
(5) VEHICULAR TRAFFIC
• Underground oil piping at the terminal is designed so that damage will not occur from vehicular traffic entering or operating in areas of the terminal where piping is located.
• Aboveground piping outside the tank farm is designed or barricaded to not be easily accessible.
• Terminal personnel escort vehicles or orient drivers entering areas of the terminal where aboveground piping may be present.

FIGURE C-4 - SITE SPECIFIC SPCC PLAN, CONTINUED

40 CFR, 112.8
(d) FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESSES
(5) VEHICULAR TRAFFIC
• Vehicular traffic is prevented from entering all areas of the terminal other than the loading rack or ethanol unloading area without prior approval by gates, and barrier poles with strung cable.

FIGURE C-5 - POTENTIAL SPILL SOURCES

Container/ Source	Failure/Cause	Total Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
ABOVEGROUND CONTAINERS - Total: Varies								
110	Leak/ Rupture	(b) (7)(F), (b) (3)		Internal Floating Roof	1989	(b) (7)(F), (b) (3)	Instantaneous within Containment	Transmix/ Diesel/ Gasoline
120	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Transmix/ Diesel/ Gasoline/Ethanol
130	Leak/ Rupture			Fixed Roof	1989		Instantaneous within Containment	Diesel
140	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing

150	Leak/ Rupture	(b) (7)(F), (b) (3)	Internal Floating Roof	1989	(b) (7)(F), (b) (3)	Instantaneous within Containment	Gasoline-Diesel Swing
160	Leak/ Rupture		Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
170	Leak/ Rupture		Fixed Roof	1989		Instantaneous within Containment	Gasoline-Diesel-Ethanol Swing
180	Leak/ Rupture		Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
MISCELLANEOUS - Total: Varies							
Loading Rack Bays 1-4	Leak/ Rupture	(b) (7)(F), (b) (3)	-	1989	(b) (7)(F), (b) (3)	Instantaneous within Containment	Transmix/ Diesel/ Gasoline/Ethanol
Ethanol unloading truck	Leak/ Rupture		-	2009		Instantaneous within Containment	Ethanol
Additive Unloading	Leak/ Rupture		-			within containment	Additive
UNDERGROUND CONTAINERS - Total: Varies							
#1	Leak/ Rupture	(b) (7)(F), (b) (3)	Fiberglass Double Wall	1996	(b) (7)(F), (b) (3)	Soil/Groundwater	Additive
#2	Leak/ Rupture		Fiberglass Double Wall	1996		Soil/Groundwater	Additive
#3	Leak/ Rupture		Fiberglass Double Wall	1996		Soil/Groundwater	Additive
#4	Leak/ Rupture		Fiberglass Double Wall	1996		Soil/Groundwater	Additive

Note: There are no surface impoundments located at this Facility.
* Not in Containment Area ** Curbing and containment system

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

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

FIGURE C-5 - POTENTIAL SPILL SOURCES

Container/	Failure/Cause	Total Capacity	Secondary Containment	Tank	Year Constructed/	Quantity Stored	Direction of Flow/Rate (See	Product

Source		(gal)	Volume Type (gal)	Type	Installed	(gal)	Plot Plan)	Stored
UNDERGROUND CONTAINERS - Total: Varies								
#5	Leak/ Rupture	(b) (7)(F), (b) (3)		Fiberglass Double Wall	1996	(b) (7)(F), (b) (3)	oil/Groundwater	Additive
#6	Leak/ Rupture			Fiberglass Double Wall	1996		oil/Groundwater	Out of Service Blanked Off
Facility (b) (7)(F), (b) (3)								

Note: There are no surface impoundments located at this Facility.
* Not in Containment Area ** Curbing and containment system

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

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

FIGURE C-6 - ADDENDUM 1

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

Section Contains No Data

FIGURE C-7 - DRAINAGE DIAGRAM

(Click here for Drainage Diagram)

FIGURE C-8 - EVACUATION DIAGRAM

(Click here for Evacuation Diagram)

FIGURE C-9 - PIPING DIAGRAM

(Click here for Piping Diagram)

FIGURE C-9 - PIPING DIAGRAM

(Click here for Piping Diagram)

FIGURE C-10 - DISCHARGE PREVENTION MEETING LOG

Spill Prevention Briefing

- Company personnel are kept knowledgeable of equipment safety factors and operating conditions.
- Annual work-orders are issued to Area Supervisor to assure oil handling personnel understand the SPCC Plan for the facility. These sessions (documented in maximo) keep personnel informed of their obligation to prevent pollution incidents and to improve spill control and response techniques.

Note: This is a sample form. Actual documentation is maintained in Maximo.

DATE	ATTENDEES

Subject/Issue Identified	Required Action	Implementation Date

FIGURE C-11 - INSPECTION PROCEDURES

Note: This is a sample form. Actual documentation is maintained in Maximo or Station log books.

INSPECTION PROCEDURE	DATE
Routine Visual Inspections (each Shift at least weekly)	
• Check tank connections for leaks and localized dead vegetation	

• Check tanks for gaps between tank and foundation and damage caused by vegetation roots	
• Check valves and packing for leaks	
• Check drains and sumps for accumulation of oil and proper operation of level controls and pumps	
• Check tank seams for leaks, including drips, puddles, discolored area, or localized dead vegetation	
• Check all tank and piping surfaces for signs of external corrosion	
• Check base of tanks for evidence of settling, leaks, including drips, puddles, or discolored areas	
• Check piping for bowing between supports, leaks, including drips, puddles, discolored area, or localized dead vegetation	
• Check vent system outlets to ensure that they are not obstructed	
• Check secondary containment for discoloration, cracks, or holes. Special attention should be given to seams and locations where piping goes through the deck, curbing, or dikes. Ensure dike valves are closed and sealed	
• Check secondary containment for debris, erosion, location/status of pipes, inlets, drainage beneath tanks, and level of precipitation in dike vs. available capacity	
• Check secondary containment for presence of water in diked area. Follow appropriate Company procedures after visual inspection of the water to determine if sheen is present on the water	
• Check all gates to ensure that only the entrances/exits currently in use by authorized personnel are open and unlocked	
• Check facility lighting to ensure proper functioning	
• Check facility fencing for damages that would allow unauthorized entry	
Monthly inspections	
• Inspect drains for accumulation of oil	
• Inspect sumps for the accumulation of oil	
• Inspect diked/curbed areas for the accumulation of oil	
• Inspect drip pans on lift stations for the accumulation of oil	
• Inspect all tanks for proper operation including gauges, sight glasses, level controls and pressure controls	

Inspect valves and valve glands for proper operation and ensure complete valve closure (leak proof)	
• Inspect sump for proper operation. Manually gauge sump and pump out if level is high	
• Examine the outside of the tank for signs of corrosion, damaged paint surfaces and signs of leaking	
• Inspect pipelines for signs of leaking or damage	
• Inspect flanges for signs of leaking or damage	
• Inspect joints for signs of leaking or damage	

Note: More stringent inspections, as required by Company procedures and documented on other forms, may be used to supplement or replace SPCC inspection records. These documents must be retained for five (5) years.

FIGURE C-12 - SECONDARY CONTAINMENT DRAINAGE LOG

Note: This is a sample form. Actual documentation is maintained in Maximo or Station log books.

DATE	TIME STARTED	TIME ENDED	OPERATOR NAME	SIGNATURE	COMMENTS

SECONDARY CONTAINMENT DRAINAGE PROCEDURES

1. Inspect water inside containment for sheen. Indicate sheen/no sheen in comments. Do not discharge if there is any visible sheen or contamination.
2. Open valve or start pump.
3. Monitor drainage.
4. Close valve and secure with seal or lock/secure pump.
5. Fill out drainage log and sign.

Signature / Date:	

FIGURE C-13 - REPORTABLE SPILL HISTORY*

Date of Discharge(s):	Jan 31, 1993
List of Discharge Causes:	Hose rupture during transfer
Material(s) Discharged:	Transmix
Amount of Discharges in Gallons:	18,000 (gals)
Amount That Reached Navigable Waters (if applicable):	0 * Note this is not a reportable per footnote #2 (gals)
Effectiveness and Capacity of Secondary Containment:	Effective
Cleanup Actions Taken:	Product recovered and disposed of with affected soils
Steps Taken to Reduce Possibility of Reoccurrence:	Minimized use of hoses and corporate policy changed
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	N/A
Enforcement Actions:	None
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual observation following morning

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

FIGURE C-13 - REPORTABLE SPILL HISTORY*

Date of Discharge(s):	May 26, 1997
List of Discharge Causes:	Weld leak on header
Material(s) Discharged:	Gasoline & diesel fuel
Amount of Discharges in Gallons:	210 (gals)
Amount That Reached Navigable Waters (if applicable):	0 * Note this is not a reportable per footnote #2 (gals)
Effectiveness and Capacity of Secondary Containment:	N/A
Cleanup Actions Taken:	Product recovered and soil remediated
Steps Taken to Reduce Possibility of Reoccurrence:	Replace piping with above ground piping
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	N/A
Enforcement Actions:	None
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual observation of product on ground and in nearby monitoring well

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

FIGURE C-13 - REPORTABLE SPILL HISTORY*

Date of Discharge(s):	June 9, 1997
List of Discharge Causes:	Tank overfill due to ineffective high level protection damaged by lightning
Material(s) Discharged:	Jet A Fuel
Amount of Discharges in Gallons:	13,062 (gals)
Amount That Reached Navigable Waters (if applicable):	0 * Note this is not a reportable per footnote #2 (gals)
Effectiveness and Capacity of Secondary Containment:	Effective
Cleanup Actions Taken:	Product recovered and soils treated
Steps Taken to Reduce Possibility of Reoccurrence:	Redundant high level switch installed
Total Oil Storage Capacity of Tank(s) or Impoundment(s)	

From Which Material Discharged:	N/A
Enforcement Actions:	None
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual observation

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

APPENDIX D Last revised: March 17, 2010

HAZARD EVALUATION AND RISK ANALYSIS

D.1 FACILITY HAZARD EVALUATION

A list of potential spill sources is identified in **FIGURE C-5**. This figure describes type and volumes of secondary containment areas along with tank manufacturer dates. Liquid storage tanks are visually inspected on a monthly basis. A description of facility operations is included in **FIGURE 1-2**.

D.2 VULNERABILITY ANALYSIS

A vulnerability analysis was performed to address the potential effects of an oil spill within the planning distance of this facility. Refer to **SECTION 6.6** for a detailed list of vulnerabilities. The following features may be impacted by a spill:

Water Intakes	Schools	Medical Facilities	Residential Areas	Businesses	Wetlands or other Sensitive Environments	Fish and Wildlife	Lakes and Streams	Endangered Flora and Fauna	Recreational Areas	Transportation Routes (air, land, water)	Utilities	Other Applicable Areas
	x									x		

D.2.1 Analysis of the Potential for a Spill

The probability of a spill occurring at this facility is minimal for the following reasons:

- Tanks were constructed in accordance with applicable engineering standards
- Tank age is reviewed as a potential factor (refer to **FIGURE C-5**)
- Truck loading terminals are equipped with concrete pads with a spill collection drain system which returns spills to the recovery system
- Truck loading racks are equipped with an overfill protection system that has liquid detection probes inside the truck tank and shuts down fill operations if a compartment is full
- Product transfers are monitored
- Facilities are inspected routinely for evidence of corrosion and leaks according to applicable API standards
- Personnel are trained in procedures to prevent pollution
- The horizontal range of a spill is dependent upon the topography and distance to the nearest water body described in more detail in **FIGURE D.4-1**
- Company personnel prepare for natural disasters by monitoring weather reports and warnings and taking appropriate precautions
- The potential for a natural disaster is acknowledged, as appropriate, during drills and exercises
- Dike drainage valves are closed and secured until it is necessary to drain excess rainwater from inside the containment area. Diked areas are drained by personnel following company procedures

Small spills could occur within the facility. The following scenarios are the most likely causes

of a small spill during normal operations:

- Piping or valve leaks
- Pump failures
- Tank overfills
- Truck overfills

The most likely scenarios for releases qualifying as medium spills include the following occurrences:

- Tank leaks
- Tank overfills
- Piping failure or rupture
- Equipment failure

A Worst Case Discharge (WCD), although unlikely, may be caused by a tank failure or natural disaster.

The facility tanks and most above-ground piping are located within earthen berm secondary containment that is sufficiently impervious to allow for retention of spilled material.

D.3 INSPECTION AND SPILL DETECTION

Inspection

In accordance with 40 CFR 112.7 (e)(8), each facility includes written procedures and records of inspection. The inspection shall include tanks, secondary containment, and response equipment (if applicable) at the facility.

Facility self-inspection requires two steps:

- Checklist of items to inspect
- Method of recording the actual inspection and its findings; records must be maintained for five (5) years.

Facility specific procedures for transfer and secondary containment inspections are provided in **APPENDIX C**. Response equipment inspection information is provided in **SECTION 7.1.2**. **FIGURE D.3-1** may be used to record equipment inspection information.

FIGURE D.3-1 - RESPONSE EQUIPMENT INSPECTION

(Other versions of this form may be used.)

ITEM	QUANTITY	LOCATION	TIME TO ACCESS/RESPOND	CONDITION	DATE USED/TESTED	SHELF LIFE	INSPECTION DATE

Inspector's Signature

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Detection

Detection of a release may occur in a number of ways including:

- Automated or manual detection by a leak detection method such as:
  - Computational Pipeline Monitoring system
  - Line Balance

  - Real-time transient model
  - Pressure/Flow monitoring
- Visual inspection
- Acoustic emission detectors
- Fixed air monitor

(b) (7)(F), (b) (3)

[redacted]

- **Training**

  All Pipeline Controllers are trained and qualified in compliance with DOT Operator Qualification rules. Training may include computer-based training modules including hydraulic principles, fire prevention, DOT Part 190, Subchapter D, by Company personnel and others.

Visual detection

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

Discharges to the land or surface waters may also be detected by Company or Contractor personnel during regular operations and inspections.

D.4 PLANNING DISTANCE CALCULATIONS EPA

To evaluate the potential risk to sensitive resources in the area, should a spill occur, a planning distance was calculated based on the following characteristics of each terminal site and vicinity according to 40 CFR 112, Attachment C-III. Factors utilized include distance to the nearest body of moving water/storm sewer/drainage ditch or swale, geology, and topography of the area.

FIGURE D.4-1 provides the planning distance calculation worksheets for each facility.

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS

Intermediate Calculations

$\propto$ = elevation (in feet) = [stream elevation @ facility] - [stream elevation @ receptor (or 20 mile point)]

ß = horizontal distance from facility to receptor (or 20 mile point) in miles

s = average steam slope = $\propto$/ ß / 5280

r = hydraulic radius (in feet) = average mid channel depth x 0.667

n = Manning's roughness coefficient from Table B

To calculate stream velocity (in ft./sec.), use: $v = 1.5/n \times r^{2/3} \times s^{1/2}$

Calculation of **PLANNING DISTANCE**

d = calculated planning distance (miles)

v = Chezy-Manning based stream velocity (ft./Sec.)

t = spill response time interval (from Table A)

c = 0.68 (sec-mile/hr-ft conversion factor)

d = v x t x c = planning distance equation

Table A	
Substantial Harm Planning Time Port Areas as Identified in 40 CFR § 112	
Boston, MA	15
New York, NY	15
Delaware Bay and River to Philadelphia	15
St. Croix, VI	15

Table B	
Manning's Roughness Coefficient for Various Natural Stream Types (n)	
Minor Streams (Top width < 100)	
Clean:	
Straight	.03
Winding	.04
Sluggish (woody, deep pools):	
No trees/brush	.06

Pascagoula, MS	15
Mississippi River from Southwest Pass, LA to Baton Rouge, LA	15
Louisiana Offshore Oil Port (LOOP)	15
Lake Charles, LA	15
Sabine-Natchez River, TX	16
Galveston Bay and Houston Ship Channel	16
Corpus Christi, TX	16
Los Angeles/Long Beach Harbor, CA	16
San Francisco Bay, San Pablo Bay, Carquinez Strait, and Suisun Bay to Antioch, CA	16
Straits of Juan de Fuca from Port Angeles, WA to and including Puget Sound	16
Prince William Sound, AK	16
Others are specified by RA for EPA Region	16
Allow other lakes, rivers, canals, inland and near shore areas	27

Trees and/or brush	.10
Major Streams (Top width > 100)	
Regular section:	
No boulders/brush	.036
Irregular section:	
Brush	.06

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS, CONTINUED

Site Investigation

The following methods and information are optional means which can be utilized to calculate the planning distance for each facility.

From USGS Quad/Topo Sheets

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

From Facility

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

From maps, local/state authorities or investigation

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

The total planning distance equals d.

	San Antonio - 1. Storm Drain
First receptor	
First receptor location (miles)	
∝ (feet)	
ß (miles)	
s (feet/mile)	
Avg. mid-channel depth (feet)	
r (feet)	
n	
v (feet/second)	0.2
t (hours)	10
c (seconds per mile/hours per foot)	0.68
d (total planning distance)	1.36

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS, CONTINUED

The total planning distance equals d.

	San Antonio - 2. Rosillo Creek
First receptor	
First receptor location (miles)	
∝ (feet)	
ß (miles)	
s (feet/mile)	
Avg. mid-channel depth (feet)	
r (feet)	
n	
v (feet/second)	0.47 USGS
t (hours)	17
c (seconds per mile/hours per foot)	0.68

d (total planning distance)	5.4 miles

If Tidally Influenced

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

- Resulting planning distance is 15 miles for persistent oils or 5 miles for nonpersistent oils from each Facility down current during ebb tide and to the point of maximum tidal influence or 15 miles for persistent oils or 5 miles for nonpersistent oils, whichever is less, during flood tide.

D.5 DISCHARGE SCENARIOS

The equipment and personnel to respond to a spill are available from several sources and are provided with the equipment and contractors in **SECTION 7.1.1** and **APPENDIX B.1.1**. The following sections are discussions of these scenarios.

D.5.1 Small and Medium Discharge Scenarios

- The purpose of this section is to identify the sources and sizes of small and medium discharges as defined by OPA 90 regulations
- Potential spill scenarios may include tank overflow, valve failure, tank failure, pipe failure, hose failure, or pump seal failure; these spills would likely be in contained areas and would be unlikely to travel offsite
- The Company would respond to these types of incidents in the same manner as a Worst Case Discharge, but at a level appropriate to the incident size; differences in response are described in the Worst Case Discharge scenario discussion described in this Appendix. The Company's response in such an event would in no way obviate the liability of any other responsible parties.
- Resources are identified in **FIGURE 3.1-6**, **SECTION 7.1.1**, and **APPENDIX B.1.1**
- All resources shall be capable of arriving at the Facility within the applicable response tier requirements (Tier 1 = 12 hours; Tier 2 = 36 hours; Tier 3 = 60 hours)

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

FACILITY OPERATIONS AND COMPONENTS	SMALL DISCHARGE (up to 2,100 gallons)	MEDIUM DISCHARGE (2,100 to 36,000 gallons)	WORST CASE DISCHARGE (volume largest tank)

Oil transfer operations	Hose failure	Hose failure	Not applicable
Facility maintenance operations	Leak from periodic maintenance, line not completely drained when opened	Seal failure Overfill	Not applicable
Facility piping	Flange, gasket, threaded connection	Seal failure Overfill	Not applicable
Pumps and sumps	Seal failure Overfill	Seal failure Overfill	Not applicable
Oil storage tanks	Overfill	Overfill	Catastrophic failure of largest tank
Age and condition of facility and components	Flange, gasket, threaded connector	Pipeline failure Seal failure	Catastrophic failure of largest tank

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The following table describes Facility Specific small and medium discharge scenarios.

SMALL DISCHARGE SCENARIOS
The most likely scenarios for a discharge of a small spill include releases during normal operations at the terminal, such as routine maintenance, transfer of products through piping, pumps, and valves, and receipts from and disbursements to tank trucks. Small spills may occur within the tank field, at the loading rack, ethanol unloading area, or in filling additive tanks. None of these mechanisms would lead to a chain reaction failure. Small spills resulting from these scenarios could range in size from less than one gallon to 2,100 gallons and consist of petroleum products or additives. Small spills would most likely be confined to the immediate area of the spill by secondary containment structures and not migrate off-site.
SMALL DISCHARGE RESPONSE RESOURCE
In the case of a small discharge (2,100 gallons) at the tank field or truck unloading/loading area, response equipment will include the following items: Spills at the truck loading rack should be collected by the underground emergency containment basin. Ethanol truck unloading occurs next to a drainage system designed to capture and collect one truck's capacity in the event of a spill. If either the loading rack or ethanol unloading area must be shut down, an emergency shutoff button is located in each loading bay and unloading skid. Activating these buttons shuts down the loading rack and unloading skids. Spills at the truck loading rack should be collected by the underground emergency overfill protection. Containment can be enhanced by oil absorbent booms and pads kept on-site. FHR can handle small spills at the facility using limited "first responder" response equipment on-site. Small spills from piping may be contained with oil absorbents found in the maintenance building. Larger spills within containment dikes would be contained, but spills should be quickly cleaned up to reduce the amount of oil soaking into the containment area floor. Spilled materials will be recovered for reuse, if possible. Recovered product can be held in FRAC tanks or another appropriate container until proper lab sampling is conducted.

If a tank overfills during a transfer, the transfer pumps will be immediately shut off by the attending terminal personnel. Once the source of the spill is stopped, the person discovering the release will follow the notification and response procedures.

If a spill occurs due to a failure of ancillary equipment, such as a relief valve or pipe connector, any flow to the tank will be terminated as soon as possible. The notification and response procedures will be followed. The source of the release will be found and mitigated, and spills will be contained with booms or absorbent material and recovered, if possible.

Oil recovery devices are capable of being deployed within 2 hours of a detection of an oil discharge with a daily effective recovery rate equal to 2,100 gallons. All contracted OSROs have daily effective recovery rates in excess of 2,100 gallons per day.

A minimum of 1,000 feet of containment boom and a means of immediate deployment within I hour of spill detection, if applicable. Two of the three contracted OSROs can respond within one hour and all have containment boom well in excess of 1,000 feet available.

Sufficient temporary storage capacity equal to or greater than 4,200 gallons (twice the daily effective recovery rate); temporary storage may be provided by dispatching of an empty tank truck, a partially filled or empty station storage tank, or a vacuum truck or frac tank supplied by an OSRO.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-6**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

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The following table describes Facility Specific small and medium discharge scenarios.

Medium Discharge Scenario
The most likely scenarios for a release of a medium spill (36,000 gallons) include tank leaks, tank overfills, pipeline failure or equipment failure. Medium spills resulting from these scenarios could range in size from 2,100 gallons to 36,000 gallons and consist of petroleum products or additives. Medium spills would most likely be at least partially confined to the immediate area of the spill by secondary containment structures. Medium spills from the truck loading rack would most likely flow through the underground emergency overfill protection system to the manually operated discharge valve to the Transmix tank (capacity >630,000 gallons). Ethanol truck unloading occurs next to a drainage system designed to capture and collect one truck's capacity in the event of a spill. A medium spill in the tank field would be confined in secondary containment.
Medium Discharge RESPONSE RESOURCE
Spill response begins with the individual who detects the spill. Upon discovering a partial spill, the person discovering the spill should attempt to safely stop any transfers of oil into the tank. In the event of a spill involving one or more pumps, spill mitigation should be carefully considered. If the spill can be stopped without causing further damage, the appropriate pump will be shut off. All other electrical devices in the area of the pump will also be shut down. When notified of an emergency, terminal personnel will immediately initiate shutdown procedures. Shutdown procedures may involve pushing one of the emergency shut down buttons located at the loading rack, office, or pump station. Pumps will be shut down, and tank valves will be closed. Tank trucks at the loading rack and unloading area will be shut off or driven away from the terminal via Pop Gunn Drive.

Spill notification and response procedures should be followed. If the source of the spill cannot immediately be controlled, the remaining contents of the tank should be transferred to another tank as quickly as possible, if this can be accomplished in a safe manner. If transferring the contents of the tank would spread the release or cause serious damage or injury, an alternate means of containment will be established. Product spills will be contained until the spill removal organization arrives. Spilled material will be recovered for reuse if practical. Recovered products can be held in FRAC tanks or another appropriate container until proper lab sampling is conducted.

All contracted OSROs can arrive on scene within 12 hours and have a daily effective recovery rate in excess of 18,000 gallons per day (50 percent of the medium discharge).

Sufficient quantity of boom can be available within 12 hours for oil collection and containment and protection of shoreline areas. Response time to the station is less than 12 hours for all OSROs, indicating sufficient time for containment booms to arrive.

For sufficient temporary storage capacity equal to or greater than 36,000 gallons (twice the effective daily recovery rate), temporary storage may be provided by dispatching an empty tank truck, a partially filled or empty station storage tank, or a vacuum truck or frac tank supplied by an OSRO.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-6**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.2 Worst Case Discharge (WCD) Scenario Discussion

APPENDIX D.7 provides Worst Case Discharge calculations. Discussion of this scenario is as follows:

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

1. The First Responder would notify Supervisory Personnel and notifications would be initiated in accordance with **FIGURE 3.1-1**.

2. The Terminal Manager would assume the role of Incident Commander until relieved and would initiate response actions and notifications in accordance with **SECTION 2**. If this were a small spill, the local/company personnel may handle all aspects of the response. Among those actions would be to:

    - Conduct safety assessment in accordance with **FIGURE 2.1-1** and evacuate personnel as needed in accordance with **SECTION 2.2**

    - Direct facility responders to shut down ignition sources

    - Ensure completion of spill report form in accordance with **FIGURE 3.1-4**

    - Ensure regulatory agencies are notified (**FIGURE 3.1-6**)

3. If this were a small or medium spill, the Qualified Individual/Incident Commander may elect for the First Responder to remain the Incident Commander or to activate selected

portions of the Incident Management Team. However, for a large spill, the Qualified Individual would assume the role of Incident Commander and would activate the entire Incident Management Team in accordance with activation procedures described in **SECTION 4.2**.

4. The Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations, and spill volume estimating in accordance with **SECTION 2.1.3**.

5. The Incident Commander would then utilize checklists in **SECTION 4.6** as a reminder of ICS position responsibilities. The primary focus would be to establish incident priorities and objectives and to brief staff accordingly.

6. The Incident Management Team would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):

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

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

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The following table describes the facility specific Worst Case Discharge scenario.

WORST CASE Discharge Scenario
A release of the entire capacity of the terminal is unlikely due to the existing product segregation procedures. A worst-case loss of petroleum from the terminal could be caused by tank failure, explosion, fire, or natural disaster and could possibly involve the maximum storage volume of the largest tank. A complete tank failure at the San Antonio Terminal could result in a release (b) (7)(F), (b) (3) to secondary containment areas. If the secondary containment were to fail, a spill would flow southwest from the tank farm into the south adjacent property. Due to the low lying topography on the south adjacent property, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property.
WORST CASE DISCHARGE RESPONSE RESOURCES
Spill response begins with the individual who detects the spill. Upon discovering a tank failure, the notification and response procedures will be followed. Outside connections to the tank system will be isolated. Product will be contained as much as possible using on-site equipment until OSROs arrive. It is recognized there is the potential for some splash over or other loss of oil off site during a worst case discharge. It is believed that approximately 80% of the volume will be contained in the secondary containment, with (b) (7)(F), (b) (3) being lost off-site during a worst case discharge. Because the potential for fires or a hazardous atmosphere is always imminent, established emergency response and health and safety procedures will be followed before entering a response zone.

Oil spill recovery equipment and resources with capacities capable of meeting the applicable tiered equipment requirements for the worst-case discharge planning volume will arrive on the scene.

Response Tier 1, with on-water recovery requirements of 2,500 bbl/day, require a response time of 12 hours. Response Tier 2, with on-water recovery requirements of 3,333 bbl/day, require a response time of 36 hours. Response Tier 3, with on-water recovery requirements of 5,000 bbl/day, require a response time of 60 hours.

Shoreline cleanup volume equal to 8,100 bbls/day. Contracted OSROs have well in excess of 8,100 bbls/day recovery capacity.

Sufficient quantities of boom for oil containment and collection and protection of shoreline areas are to arrive on the scene within the tiered response times; all OSROs are less than 12 hours from the station.

Storage capacity is to be made available, equal to or greater than twice the effective daily recovery rate; temporary storage may be provided by a empty tank truck, a partially filled or empty station storage tank, or equipment supplied by an OSRO. Eagle has a temporary (b) (7)(F), (b) (3) [redacted] of temporary storage capacity available.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-6**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.3 Description of Factors Affecting Response Efforts

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

FACTORS	CONSIDERATIONS AFFECTING RESPONSE EFFORTS
Size of spill	• Location of spill in relation to identified sensitivities and/or sensitive areas • Spread and spill movement
Proximity to downgradient water intakes	• Refer to **SECTION 6.10** for maps showing proximity to downgradient water intakes
Proximity to fish, wildlife, and sensitive environments	• A release could impact fish, wildlife and sensitive environments as described in **SECTION 6.4** and **SECTION 6.5**
Likelihood that discharge will travel offsite	• A small spill is unlikely to travel offsite • A medium spill has the potential to travel offsite • A Worst Case Discharge has the greatest potential to travel offsite if secondary containment is breached

Location of material spilled	• See facility information and drainage located in **FIGURE 1-5**. Facility tankage, piping, and transfer areas are displayed on drawings provided in **FIGURE C-7**
Material discharged	• Typically Gasoline , Fuel Oil, Ethanol (received by truck) • Product is considered nonpersistent but not volatile
Weather or aquatic conditions	• The areas have the potential to be affected by tornadoes, flooding, and lightning strikes
Available remediation equipment	• The Company has response equipment available • Resources are available through oil spill response contractors in quantities sufficient to meet applicable planning standards
Probability of a chain reaction or failures	• Potential for a chain reaction or failure is remotely possible but not anticipated; secondary containment, response contractors and trained personnel minimize the potential of such events
Direction of spill pathway	• Refer to sensitivity maps in **SECTION 6.10** • Wind direction and speed combined with currents, will determine spill trajectory

D.6 PLANNING VOLUME CALCULATIONS

Once the Worst Case Discharge volume has been calculated, response resources must be identified to meet the requirements of 40 CFR 112.20(h). Calculations to determine sufficient amount of response equipment necessary to respond to a Worst Case Discharge is described below. A demonstration of the planning volume calculations is provided below.

D.7 SPILL VOLUME CALCULATION EPA

EPA portion of the facility (non-transportation related)

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

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

TYPE	DESCRIPTION	PRODUCT	WCD VOLUME (BBLs)

Multiple tanks with secondary containment	Above ground storage tank #150	Gasoline	(b) (7) (F) (b)

Given below is planning volume data.

San Antonio D - 18

EPA PLANNING VOLUME DATA

STEP	PARAMETER	San Antonio
(A)	WCD (bbls)	(b) (7) (F) (b)
(B)	Oil group	I
(C)	*Geographic area	Rivers and Canals
(D1)	Percent lost to natural dissipation	80
(D2)	Percent recovered floating oil	10
(D3)	Percent oil onshore	10
(E1)	On water recovery (bbls)	(b) (7)(F), (b) (3)
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	1
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.3
(G2)	Tier II	0.4
(G3)	Tier III	0.6
Part II	On water recovery capacity (bbls/day)	
	Tier I	2,400
	Tier II	3,200
	Tier III	4,800
Part III	Shoreline cleanup volume (bbls/day)	8,000
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	1,875
(J2)	Tier II	3,750
(J3)	Tier III	7,500
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	(b) (7)(F), (b) (3)
	Tier II	
	Tier III	

* R = Rivers and canals
N = Nearshore/Inland

EPA PLANNING VOLUME DATA

STEP	PARAMETER	San Antonio
(A)	WCD (bbls)	(b) (7)(F), (b)
(B)	Oil group	II
(C)	*Geographic area	Rivers or Canals
(D1)	Percent lost to natural dissipation	40
(D2)	Percent recovered floating oil	15
(D3)	Percent oil onshore	45
(E1)	On water recovery (bbls)	(b) (7)(F), (b) (3)
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	1.8
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.3
(G2)	Tier II	0.4
(G3)	Tier III	0.6
Part II	On water recovery capacity (bbls/day)	
	Tier I	2,025
	Tier II	2,700
	Tier III	4,050
Part III	Shoreline cleanup volume (bbls/day)	20,250
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	1,875
(J2)	Tier II	3,750
(J3)	Tier III	7,500
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	(b) (7)(F), (b) (3)
	Tier II	
	Tier III	

* R = Rivers and canals
N = Nearshore/Inland

EPA PLANNING VOLUME DATA

STEP	PARAMETER	San Antonio
(A)	WCD (bbls)	(b) (7)(F), (b)
(B)	Oil group	III
(C)	*Geographic area	Rivers and Canals
(D1)	Percent lost to natural dissipation	20
(D2)	Percent recovered floating oil	15
(D3)	Percent oil onshore	65
(E1)	On water recovery (bbls)	(b) (7)(F), (b) (3)
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	2.0
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.3
(G2)	Tier II	0.4
(G3)	Tier III	0.6
Part II	On water recovery capacity (bbls/day)	
	Tier I	4,950
	Tier II	6,600
	Tier III	9,900
Part III	Shoreline cleanup volume (bbls/day)	71,500
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	1,875
(J2)	Tier II	3,750
(J3)	Tier III	7,500
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	(b) (7)(F), (b) (3)
	Tier II	
	Tier III	

* R = Rivers and canals
N = Nearshore/Inland

D.8 SPILL VOLUME CALCULATION DOT

DOT/PHMSA portion of pipeline/facilities

The Worst Case Discharge (WCD) for the DOT portion of the pipeline and facilities, is defined in 49 CFR 194.105(b) as the largest volume of the following:

1. The pipeline's maximum shutdown response time in hours (based on historic discharge data or in the absence of such data, the operators best estimate), multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum daily capacity of the pipeline), plus the largest drainage volume after shutdown of the line section(s) in the response zone expressed in barrels; or

2. The largest foreseeable discharge for the line section(s) within a response zone, expressed in barrels (cubic meters), based on the maximum historic discharge, if one exists, adjusted for any subsequent corrective or preventative action taken; or

3. If the response zone contains one or more breakout tanks, the capacity of the single largest tank or battery of tanks within a single secondary containment system, adjusted for the capacity or size of the secondary containment system, expressed in barrels.

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

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

* Note: The facilities do not have tertiary containment.

The Worst Case Discharge for each response zone was based on the largest volume of the three criteria given above.

The Company has determined the Worst Case Discharge volume to be 25% of the volume of the largest tank in the zone.

All of the breakout tanks in the pipeline system are within adequate secondary containment, therefore, the discharge volumes for the largest tank was determined by adjusting the total tank

volume downward by 75% per the company guidelines.

Considering the volume of release from a line break compared to that of the volumes released from a tank failure, the tank failure was found to represent the Worst Case Discharge scenario.

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

The Worst Case Discharge for each pipeline segment is the largest breakout tank. These tank volumes are as follows:

LOCATION	VOLUME (BBLS)
(b) (7)(F), (b) (3)	(b) (7)(F), (b) (3)

The worst case tank volume is calculated as follows:

Largest tank x Credit for containment tank standards = Tank standards credit

(b) (7)(F), (b) (3)

The Worst Case Discharge for the pipeline segment is calculated at the Not Applicable .

WCD = [(DT + ST) x MF] + DD

Where:

WCD = Worst Case Discharge (bbl)

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

MF = maximum flow rate (bph) (using 0 bph)

DD = drain down volume (bbl) (internal diameter)

WCD = 0 hours x 0 bph + 0 bbls = 0.00 bbls

(b) (7)(F), (b) (3)

D.9 PIPELINE - ABNORMAL CONDITIONS

PHMSA considers the “substantial threat” term to be equivalent to the “abnormal conditions” term under 49 CFR Part 195.402(d), procedures to identify events and conditions that can pose a threat of Worst Case Discharge, and actions to take for preventing and mitigating such events and conditions, are described in the Operating, Maintenance, and Emergency Procedures for

Hazardous Liquids Manual.

D.10 PRODUCT CHARACTERISTICS AND HAZARDS

This Facility may store various types of commodities including but not limited to:

- Ethanol (received by truck)
- Fuel Oil
- Gasoline

MSDS can be obtained by the facility in the Employee Right To Know Stations, additionally MSDS may also be available electronically via intra and internet.

FIGURE D.10-1 describes primary oils handled.

FIGURE D.10-1 - SUMMARY OF COMMODITY CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Ethanol (received by truck)	Ethanol, for Gasoline Blending	2	4	C	1	This material is a known cancer hazard, contains benzene, causes eye and skin irritation, is an aspiration hazard if swallowed, and can enter lungs and cause damage. Overexposure may cause injury to the central nervous system, stomach, male reproductive system, heart, and is a potential hazard to the fetus.
						Can cause eye, skin or respiratory tract irritation. May be harmful if inhaled or

Fuel Oil	Appropriate Name	2	2	0	1	absorbed through the skin. Overexposure can cause central nervous system (CNS) depression and/or other target organ effects.
Gasoline	Gasoline	2	3	C	0	Long term, repeated exposure may cause cancer, blood, kidney and nervous system damage, and contains benzene.

Health Hazard	**4 = Extremely Hazardous** **3 = Hazardous** **2 = Warning** **1 = Slightly Hazardous** **0 = No Unusual Hazard**	**Fire Hazard (Flash Point)**	**4 = Below 73Â° F, 22Â° C** **3 = Below 100Â° F, 37Â° C** **2 = Below 200Â° F, 93Â° C** **1 = Above 200Â° F, 93Â° C** **0 = Will not burn**
Special Hazard	**A = Asphyxiant** **C = Contains Carcinogen** **W = Reacts with Water** **Y = Radiation Hazard** **COR = Corrosive** **OX = Oxidizer** **H_2S = Hydrogen Sulfide** **P = Contents under Pressure** **T = Hot Material**	**Reactivity Hazard**	**4 = May Detonate at Room Temperature** **3 = May Detonate with Heat or Shock** **2 = Violent Chemical Change with High Temperature and Pressure** **1 = Not Stable if Heated** **0 = Stable**

APPENDIX E Last revised: February 2006

CROSS-REFERENCES

FIGURE E-1 - EPA / FRP CROSS-REFERENCE

EPA FRP REQUIREMENTS	LOCATION
Facility Information	
General Information (1.0)	
• Facility Name	Figure 1-2
• FRP #	Figure 1-2
• Facility Address	Figure 1-2
• Facility Telephone	Figure 1-2
• Facility Owner	Figure 1-2
• Owner Address	Figure 1-2
• Owner Telephone	Figure 1-2
• Name of Protected Waterway/ Environmentally Sensitive Area	Section 6.6
• Distance from Facility	Figure D.4-1
Standard Facility Response Plan (sec. 1.0)	
Emergency Response Action Plan (ERAP) (sec. 1.1)	
Qualified Individual (QI) information (sec. 1.2) partial	ERAP - Figure 3-3
Emergency notification phone list (sec. 1.3.1) partial	ERAP - Figure 3-3, Figure 3-4, Figure 3-5, Figure 3-6
Spill response notification form (sec. 1.3.1) partial	ERAP - Figure 3-1, Figure 3-2
Response equipment list and location (sec. 1.3.2) complete	ERAP - Figure 4-2, Figure 4-3
Response equipment testing and deployment (sec. 1.3.4) complete	ERAP - Figure 4-4
Facility response team list (sec. 1.3.4) partial	ERAP - Figure 3-3
Facility evacuation plan (sec. 1.3.5) condensed	ERAP - Section 2.2
Immediate actions (sec. 1.7.1) complete	ERAP - Section 2
Facility diagrams (sec. 1.9) complete	ERAP - Figure 6-2
Facility Information (sec. 1.2)	
Facility name and location (sec. 1.2.1)	Figure 1-2
Latitude and longitude (sec. 1.2.2)	Figure 1-2

Wellhead protection area (sec. 1.2.3)	Figure 1-2
Owner/ operator (both names included, if different (sec. 1.2.4)	Figure 1-2
QuaIified Individual (sec. 1.2.5) (name, position, home and work address, phone numbers) and specific response training experience	Figure 1-2
Date of oil storage start-up (sec. 1.2.6)	Figure 1-2
Current operation (sec. 1.2.7)	Figure 1-2
Date and type of substantial expansion (sec. 1.2.8)	Figure 1-2

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Emergency Response Information (sec. 1.3)	
Notification (sec. 1.3.1)	
National Response Center phone number	Figure 3.1-6
Qualified Individual (day and evening) phone numbers	Figure 1-2, Figure 3.1-5
Company Response Team (day and evening) phone numbers	Figure 3.1-5
Federal On-Scene Coordinator (FOSC) and/ or Regional Response Center (day and evening) phone numbers	Figure 3.1-6
Local response team phone numbers (fire department/ cooperatives)	Figure 3.1-6
Fire marshal (day and evening) phone numbers	Figure 3.1-6
State Emergency Response Commission (SERC) phone number	Figure 3.1-6
State police phone number	Figure 3.1-6
Local Emergency Planning Committee (LEPC) phone number	Figure 3.1-6
Local water supply system (day and evening) phone numbers	Figure 3.1-8
Weather report phone number	Figure 3.1-8
Local TV/ radio phone number(s) for evacuation notification	Figure 3.1-8
Hospital phone number	Figure 3.1-6
Spill Response Notification Form	
• Reporter's name	Figure 3.1-4
• Company information	Figure 3.1-4
• Incident description	Figure 3.1-4
• Materials	Figure 3.1-4
• Response actions	Figure 3.1-4

Impact	Figure 3.1-4
Response Equipment List (Identify if Facility, OSRO, CO-OP owned by letters O, F, or C) (sec. 1.3.2)	
Equipment list	Figure 7.1-1, Section 7.1.1
Equipment location	Figure 7.1-1, Section 7.1.1
Release handling capabilities and limitations	Figure 7.1-1, Section 7.1.1
Response Equipment Testing/ Deployment (sec. 1.3.3)	
Last inspection or equipment test date	Figure A.1-1
Inspection frequency	Figure A.1-1
Last deployment drill date	Figure A.1-1
Deployment frequency	Figure A.1-1
OSRO certification (if applicable)	Figure B.1-1

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Response Personnel (sec. 1.3.4)	
Emergency response personnel list	Figure 3.1-5
Emergency response contractors	Figure 3.1-6, Figure 3.1-7, Figure 7.1-1, Appendix B
Evidence of response capability	Appendix B
Facility response team list (sec. 1.3.4)	Figure 3.1-5
Evacuation Plans (sec. 1.3.5)	
Facility-wide evacuation plan	Section 2.2
Reference to existing community evacuation plans (sec. 1.3.5.3)	Section 2.2
Evacuation routes shown on diagram	Figure C-8
Qualified Individual's Duties (sec. 1.3.6)	
Description of duties	Section 4.5
Consistent with requirements	Section 4.5
Hazard Evaluation (sec. 1.4)	
Hazard Identification (sec. 1.4.1)	
Schematic Diagram	
Labeled schematic drawing	Figure C-8
Above-ground tanks identified separately	Figure C-8

Below-ground tanks identified separately	Figure C-8
Surface impoundments identified separately	N/A
Tank Form:	
Tank number	Figure C-5
Substance stored	Figure C-5
Quantity stored	Figure C-5
Tank type and year installed	Figure C-5
Maximum capacity	Figure C-5
Failure/ Cause	Figure C-5
Surface Impoundment Form:	
Surface impoundment number	N/A
Substance stored	N/A
Quantity stored	N/A
Surface area/ year	N/A
Maximum capacity	N/A
Failure/ Cause	N/A

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Facility Operations Description:	
Loading and unloading procedures	Figure 1-2, Figure C-4
Day to day operations	Figure 1-2
Secondary containment	Figure C-5
Daily throughput	Figure 1-2
Vulnerability Analysis (sec. 1.4.2)	
Vulnerability of:	
• Water intakes	Section 6.6
• Schools	Section 6.6
• Medical facilities	Section 6.6
• Residential areas	Section 6.6
• Business	Section 6.6
• Wetlands or other environmentally sensitive areas	Section 6.6

• Fish and wildlife	Section 6.6
• Lakes and streams	Section 6.6
• Endangered flora and fauna	Section 6.6
• Recreational areas	Section 6.6
• Transportation routes (air, land, and water)	Section 6.6
• Utilities	Section 6.6
• Other applicable areas (List below)	Section 6.6
• Other areas:	Section 6.6
Analysis of Potential for a Spill (sec. 1.4.3)	
Probability of spill occurring at the facility	Appendix D.2.1
Incorporates Factors:	
Tank age	Figure C-5
Spill history	Figure C-13
Horizontal range of a potential spill	Figure D.4-1
Vulnerability to natural disaster	Appendix D.2.1, Section 2
Facility Reportable Oil Spill History Description (sec. 1.4.4)	
Date of discharge	Figure C-13
List of discharge causes	Figure C-13
Materials discharged	Figure C-13
Amount discharged in gallons	Figure C-13
Amount of discharge that reached navigable waters	Figure C-13
Effectiveness and capacity of secondary containment	Figure C-13
Clean-up actions taken	Figure C-13

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Facility Reportable Oil Spill History Description (sec. 1.4.4), Continued	
Steps taken to reduce possibility of reoccurrence	Figure C-13
Total oil storage capacity of tank(s) or impoundment(s) from which material is discharged	Figure C-13

Effectiveness of monitoring equipment	Figure C-13
Description of how each spill was detected	Figure C-13
Discharge Scenarios (sec. 1.5)	
Small and Medium Volume Discharges (sec. 1.5.1)	
Small Volume Discharges	
Small volume discharge calculation for a facility	Appendix D.5
Facility-specific spill potential analysis	Appendix D.5
Average most probable discharge for "complexes"	N/A
1,000 feet of boom (1 hour deployment time)	Section 7.1.1, Figure 7.1-1, Appendix B
Correct amount of boom for "complexes"	N/A
Oil recovery devices equal to small discharge (2 hour recovery time)	Section 7.1.1, Figure 7.1-1, Section 7.4.1, Appendix B
Oil storage capacity for recovered material	Section 7.1.1, Figure 7.1-1, Section 7.4.1, Appendix B
Medium Volume Discharges	
Medium volume discharge calculation for a facility	Appendix D.5
Facility-specific spill potential analysis	Appendix D.5
Maximum most probable discharge for "complexes"	N/A
Oil recovery devices equal to medium discharge	Section 7.1.1, Figure 7.1-1, Section 7.4.1, Appendix B
Availability of sufficient quantity of boom	Section 7.1.1, Figure 7.1-1, Appendix B
Oil storage capacity for recovered material	Section 7.1.1, Figure 7.1-1, Section 7.4.1, Appendix B
Worst Case Discharge (WCD) (sec. 1.5.2)	
Correct WCD calculations	Appendix D.7
Correct WCD for "complexes"	N/A
Sufficient response resources for WCD	Appendix D.7, Figure 7.1-1, Appendix B
Sources and quantity of equipment for response to WCD	Appendix D.7, Figure 7.1-1, Appendix B
Oil storage capacity for recovered material	Appendix D.7, Figure 7.1-1, Section 7.4.1, Appendix B

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Discharge Detection Systems (sec. 1.6)	
Discharge Detection by Personnel (sec. 1.6.1)	
Detection procedures	Appendix D.3
Discussion of facility inspections	Figure C-11, Appendix D.3
Initial response actions	Figure 2.1-1
Automated Discharge Detection (sec. 1.6.2)	
Equipment description	Appendix D.3
Alarm verification procedures	Appendix D.3
Initial response actions	Section 2
Plan Implementation (sec. 1.7)	
Response Resources (sec. 1.7.1)	
Demonstration of accessibility of proper response personnel and equipment	Appendix B
Emergency plans for spill response	Section 2
Additional training	Appendix A.2
Additional contracted help	Appendix B
Access to additional equipment/ experts	Appendix B
Ability to implement plan, including training and practice drills	Appendix A
Immediate Actions Form for small, medium, and worst-case spills	Section 2.1
Disposal Plans (sec. 1.7.2)	
How and where materials will be disposed	Section 5.6, Section 7.4
Disposal permits	Section 5.6, Section 7.4
Containment and Drainage Planning (sec. 1.7.3)	
Containment and drainage plan available	Appendix C
Incorporates Factors:	
Available volume of containment	Figure C-5
Route(s) of drainage	Figure C-7
Construction materials used in drainage troughs	Figure C-7
Type and number of valves separators	Figure C-7
Sump pump capacities	Figure C-7
Containment capacity of weirs and booms	Section 7.1.1, Appendix B
Other clean up materials	Section 7.1.1, Appendix B
Self-Inspection, Drills/ Exercises, and Response Training (sec. 1.8)	

Facility Self-Inspection (sec. 1.8.1)	
Inspection checklist (with dates)	Figure C-11
Records maintained for five years	Figure C-11

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Tank Inspection (sec. 1.8.1.1)	
Tank leaks	Figure C-11
Tank foundations	Figure C-11
Tank piping	Figure C-11
Response Equipment Inspection (sec. 1.8.1.2)	
Inventory (item and quantity)	Section 7.1.1
Storage location (time to access and respond)	Section 7.1.1
Operation status/ condition	Maintain as hard copy or by electronic record
Actual use/ testing (last test date and frequency of testing)	Maintain as hard copy or by electronic record
Shelf life	Maintain as hard copy or by electronic record
Secondary Containment Inspection (sec. 1.8.1.3)	
Dike or berm system	Figure C-11
Secondary containment	Figure C-11
Retention and drainage ponds	Figure C-11
Facility Drills/ Exercises (sec. 1.8.2)	
Facility drills/ exercise description	Appendix A.1
Equipment deployment exercise	Appendix A.1
Unannounced exercise	Appendix A.1
Area exercises	Appendix A.1
Qualified Individual Notification Drills	Appendix A.1
Qualified Individual Notification Drill Log (sec. 1.8.2.1) (date, company, qualified individual, other contacted, emergency scenario, evaluation)	Appendix A.1
Incident Management Team Tabletop Exercises	Appendix A.1
Incident Management Team Tabletop Drill Log (sec. 1.8.2.2) (date, company, qualified individual, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation)	Appendix A.1
Response Training (sec. 1.8.3)	

Description of response training program (including topics)	Figure A.2-2
Personnel Response Training Logs (name, response training date/ and number of hours, prevention training date/ and number of hours)	Figure A.2-1
Discharge Prevention Meeting Log (date, attendees)	Figure C-10
Diagrams (sec. 1.9)	
Site Diagram includes:	
Entire facility to scale	Figure 1-5
Above and below-ground bulk storage tanks	Figure 1-5
Contents and capacities of bulk storage tanks	Figure 1-5
Contents and capacities of drum storage areas	Figure 1-5

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Site Diagram includes, Continued:	
Contents and capacities of surface impoundments	N/A
Process buildings	Figure 1-5
Transfer areas	Figure 1-5
Secondary containment systems	Figure 1-5
Structures where hazardous materials are used and capacity	Figure 1-5
Location of communication and emergency response equipment	Figure 1-5
Location of electrical equipment which contains oil	Figure 1-5
If a "complex" facility, interface between EPA and other regulating agencies	N/A
Site Drainage Diagram	
Major sanitary and storm sewers, manholes, and drains	Figure C-7
Weirs and shut-off valves	Figure C-7
Surface water receiving streams	Figure C-7
Fire fighting water sources	Figure C-7
Other utilities	Figure C-7
Response personnel ingress and egress	Figure C-7
Equipment transportation routes	Figure C-7
Direction of spill flow from release points	Figure C-7
Site Evacuation Diagram includes:	
Site plan diagram with evacuation routes	Figure C-8
Location of evacuation regrouping areas	Figure C-8

Site Security (sec. 1.10)	
Emergency cut-off locations	Figure 7.3-2, Figure C-8
Enclosure	Figure 7.3-2, Figure C-8
Guards and their duties, day and night	Figure 7.3-2, Figure C-8
Lighting	Figure 7.3-2, Figure C-8
Valve and pump locks	Figure 7.3-2, Figure C-8
Pipeline connection caps	Figure 7.3-2, Figure C-8
Response Plan Cover Sheet (sec. 2.0)	
Owner/ operator of facility	Figure 1.1-1
Facility name	Figure 1.1-1
Facility address	Figure 1.1-1
Facility phone number	Figure 1.1-1
Latitude and longitude	Figure 1.1-1
Dun and Bradstreet number	Figure 1.1-1

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Response Plan Cover Sheet (sec. 2.0), Continued	
North American Industrial Classification System (NAICS) Code	Figure 1.1-1
Largest oil tank storage capacity	Figure 1.1-1
Maximum oil storage capacity	Figure 1.1-1
Number of oil storage tanks	Figure 1.1-1
Worst case discharge amount	Figure 1.1-1
Facility distance to navigable waters	Figure 1.1-1
Applicability of substantial harm criteria	Figure 1.1-1
Certification	Figure 1.1-1

FIGURE E-2 - DOT / PHMSA CROSS-REFERENCE

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary	
• For the core plan:	
• Name and address of operator	Figure 1-2

For each Response Zone which contains one or more line sections that meet the criteria for determining significant and substantial harm (§194.103), listing and description of Response Zones, including county(s) and state(s)	Figure 1-2
• For each Response Zone appendix:	
• Information summary for core plan	Section 1
• QI names and telephone numbers, available on 24-hr basis	Figure 1-2
• Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment	Figure 1-2
• List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation	Figure 1-2
• Basis for operator's determination of significant and substantial harm	Figure 1-2
• The type of oil and volume of the worst case discharge	Appendix D
• Certification that the operator has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or threat of such discharge	Section 1.3, Appendix B
Notification Procedures	
• Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements	Figure 3.1-5, Figure 3.1-6
• Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority	Section 3.1, Figure 2.1-1
• Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel	Figure 3.1-1, Figure 3.1-5, Figure 3.1-6
• Procedures for notifying Qualified Individuals	Section 3.1, Section 4.5, Figure 4.5-1
• Primary and secondary communication methods by which notifications can be made	Section 7.1.6

FIGURE E-2 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION

• Information to be provided in the initial and each follow-up notification, including the following:
  • Name of pipeline
  • Time of discharge
  • Location of discharge
  • Name of oil recovered
  • Reason for discharge (e.g. material failure, excavation damage, corrosion)
  • Estimated volume of oil discharged
  • Weather conditions on scene
  • Actions taken or planned by persons on scene
	Figure 3.1-3

Spill Detection and On-Scene Spill Mitigation Procedures	
• Methods of initial discharge detection	Section 2.1.1
• Procedures, listed in order of priority, that personnel are required to follow in responding to a pipeline emergency to mitigate or prevent any discharge from the pipeline	Section 2

• List of equipment that may be needed in response activities based on land and navigable waters including:
  • Transfer hoses and pumps
  • Portable pumps and ancillary equipment
  • Facilities available to transport and receive oil from a leaking pipeline
	Section 7.1.1, Appendix B

• Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis	Figure 3.1-7, Appendix B
• Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis	Figure 3.1-7, 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 4.6, Appendix B
• Qualified Individual’s responsibilities and authority, including notification of the response resources identified in the response	Section 4.5

plan	
• Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions	Section 4.5, Section 4.6
• Oil spill response organizations (OSRO) available through contract or other approved means, to respond to a worst case discharge to the maximum extent practicable	Appendix B, Figure 3.1-7

• For each organization identified under paragraph (d), a listing of:
  • Equipment and supplies available
  • Trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization for the first seven days of the response
	Appendix B

FIGURE E-2 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
List of Contacts	
• List of persons the Plan requires the operator to contact	Figure 3.1-1
• Qualified individuals for the operator's areas of operation	Figure 1-2
• 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, Figure 3.1-5, Figure 3.1-6
Training Procedures	
• Description of training procedures and programs of the operations	Appendix A.2
Drill Procedures	
• Announced and unannounced drills	Appendix A.1

• Types of drills and their frequencies; for example:
  • Manned pipeline emergency procedures and qualified individual notification drills conducted quarterly
  • Drills involving emergency actions by assigned operating or maintenance personnel and notification of qualified
	Appendix A.1

individual on pipeline facilities which are normally unmanned, conducted quarterly • Shore-based Incident Management Team (IMT) tabletop drills conducted yearly • Oil spill removal organization field equipment deployment drills conducted yearly • A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years	
Response Plan review and update procedures	
• Procedures to meet §194.121	Section 1.2
• Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness	Section 1.2, Appendix C
Response zone appendices	
Each response zone appendix would provide the following information:	
• Name and telephone number of the qualified individual	Figure 1-2
• Notification procedures	Section 3
• Spill detection and mitigation procedures	Section 2.1, Appendix C
• Name, address, and telephone number of oil spill response organization	Figure 3.1-7, Appendix B
• Response activities and response resources including: • Equipment and supplies necessary to meet §194.115 • Trained personnel necessary to sustain operation of the equipment and to staff the oil spill response organization and Incident Management Team for the first seven days of the response	Appendix A, Appendix B

FIGURE E-2 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
• Names and telephone numbers of federal, state, and local agencies which the operator expects to assume pollution response responsibilities	Figure 3.1-6
• Worst case discharge volume	Appendix C

• Method used to determine the worst case discharge volume, with calculations	Appendix C, Appendix D

• A map that clearly shows:
  • Location of worst case discharge
  • Distance between each line section in the Response Zone:
  • Each potentially affected public drinking water intake, lake, river, and stream within a radius of five miles of the line section
  • Each potentially affected environmentally sensitive area within a radius of one mile of the line section
	Figure 1-5, Section 6.10

• 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, Figure C-9

• For every oil transported by each pipeline in the response zone, emergency response data that:
  • Include name, description, physical and chemical characteristics, health and safety hazards, and initial spill-handling and firefighting methods
  • Meet 29 CFR 1910.1200 or 49 CFR 172.602
	Figure 1-2, Appendix D.10

FIGURE E-3 - OSHA CROSS-REFERENCE

EAP REQUIREMENTS (29 CFR 1910.38 [a] [2])	LOCATION
• Emergency escape procedures and emergency escape route assignments	Figure C-8, Section 2.2
• Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	N/A
• Procedures to account for all employees after emergency evacuation has been completed	Section 2.2
• Rescue and medical duties for those employees who are to perform them	Section 2
• The preferred means of reporting fires and other emergencies	Section 2, Figure 3.1-6
• Names of regular job titles of persons or departments who can	Figure 3.1-5, Section

be contacted for further information or explanation of duties under the plan	4.6

ERP REQUIREMENTS (29 CFR 1910.120 [l] [2])	LOCATION
• Pre-emergency planning	Appendix C, Appendix D
• Personnel roles, lines of authority, and communication	Section 4, Section 7.1.6
• Emergency recognition and prevention	Section 2, Appendix C, Appendix D
• Safe distances and places of refuge	Section 2
• Site security and control	Section 5.7, Section 7.3
• Decontamination procedures which are not covered by the site safety and health plan	Section 5.5
• Emergency medical treatment and first aid	Section 2.8
• Emergency alerting and response procedures	Section 2, Section 3
• Critique of response and follow-up	Section 8.3
• PPE and emergency equipment	Section 7, Section 5.4

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE

EPA / RCRA REQUIREMENTS (40 CFR PART 265.16)		LOCATION
§ 265.16	**Applicability**	
a	(1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.	Figure A.2-1
	(2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste	Figure A.2-1

	management procedures (including contingency plan implementation) relevant to the positions in which they are employed.	
	(3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable: (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (ii) Key parameters for automatic waste feed cut-off systems; (iii) Communications or alarm systems; (iv) Response to fires or explosions; (v) Response to ground-water contamination incidents; and (vi) Shutdown of operations.	Appendix A.1, Figure A.2
	(4) For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the facility is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the requirements of this section.	Appendix A.1, Figure A.2
b	Facility personnel must successfully complete the program required in paragraph (a) of this section within six months after the effective date of these regulations or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this section.	Figure A.2-1
c	Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.	Figure A.2-1

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.16)		LOCATION
§ 265.16	**Applicability**	
d	The owner or operator must maintain the following documents and records at the facility:	
	(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;	Figure 3.1-5
	(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of	Figure E-3, Section 4

	specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; Facility Manager – (typically the terminal or station manager) responsible for the overall hazardous and non-hazardous waste management functions at the facility. Facility Hazardous Waste Technician – responsible for hazardous waste management functions at the facility as directed by the Facility Environmental Manager; typically performs physical hands-on waste activities including moving, storage and labeling of containers, collecting samples, performing weekly waste container inspections, and oversight of offsite waste shipments. (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;(4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.	Figure A.2-1
e	Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.	Figure A.2-1

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.30 - 265.37)		LOCATION
§ 265.30	**Applicability**	
	The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as §265.1 provides otherwise.	
§ 265.31	**Maintenance and operation of facility.**	
	Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or	

	the environment.	
§ 265.32	**Required equipment.**	
	All facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:	
a	An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;	Section 7.1.6
b	A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;	Section 7.1.6
c	Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and	Section 7.1.1, Figure C-8
d	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.	Section 2.11
§ 265.33	**Testing and maintenance of equipment.**	
	All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.	Appendix A.1
§ 265.34	**Access to communications or alarm system.**	
a	Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under §265.32.	Not Applicable

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.30 - 265.37)		LOCATION
§ 265.34	**Access to communications or alarm system.**	
b	If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held	Section 7.1.6

	two-way radio, capable of summoning external emergency assistance, unless such a device is not required under §265.32.	
§ 265.35	**Required aisle space.**	
	The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.	Figure 2.1-1
§ 265.37	**Arrangements with local authorities.**	
a	The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	
	(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;	Section 1.1
	(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;	Section 1.1
	(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and	Appendix B
	(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.	Section 1.1
b	Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.	Section 1.1

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.50	**Applicability**	
	The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as	Section 1.1

	265.1 provides otherwise.	
§ 265.51	Purpose and Implementation of Contingency Plan	
a	Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.	Section 1.1
b	The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.	Section 1.1
§ 265.52	Content of Contingency Plan	
a	The contingency plan must describe the actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.	Section 2
b	If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasure (SPCC) Plan in accordance with Part 112 of this chapter, or Part 1510 of Chapter V, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this part.	Section 7.4
c	The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 265.37.	Figure 1-1, Appendix G
d	The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.	Figure 1-2
e	The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.	Section 7.1.1

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.52	Content of Contingency Plan, Continued	
f	The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).	Section 2.2, Figure C-8
§ 265.53	Copies of Contingency Plan	
	A copy of the contingency plan and all revisions to the plan must be:	-----
a	Maintained at the facility, and	Section 1.2
b	Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.	Section 1.2, Figure 1-1
§ 265.54	Amendment of Contingency Plan	
	The contingency plan must be reviewed, and immediately amended, if necessary, whenever:	-----
a	Applicable regulations are revised;	Section 1.2
b	The plan fails in an emergency;	Section 1.2
c	The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;	Section 1.2
d	The list of emergency coordinators changes; or	Section 1.2
e	The list of emergency equipment changes.	Section 1.2
§ 265.55	Emergency Coordinator	
	At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.	Figure 1-2, Figure 3.1-5, Section 4.5, Appendix A

	[Comment: The emergency coordinator's responsibilities are more fully spelled out in 265.56. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility].	

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.56	Emergency Procedures	
a	Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:	Section 4.5
a(1)	Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and	Section 4.5
a(2)	Notify appropriate State or local agencies with designated response roles if their help is needed.	Section 4.5
b	Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.	Section 4.5
c	Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).	Section 4.5
d	If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside of the facility, he must report his findings as follows:	Section 4.5
d(1)	**If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and**	Section 4.5

d(2)	He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510 of this Title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:	Section 4.5, Figure 3.1-2
d(2)(i)	Name and telephone number of reporter:	Figure 3.1-2
d(2)(ii)	Name and address of facility;	Figure 3.1-2
d(2)(iii)	Time and type of incident (e.g., release, fire);	Figure 3.1-2
d(2)(iv)	Name and quantity of material(s) involved, to the extent known;	Figure 3.1-2
d(2)(v)	The extent of injuries, if any; and	Figure 3.1-2
d(2)(vi)	The possible hazards to human health, or the environment, outside the facility.	Figure 3.1-2

FIGURE E-4 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.56	**Emergency Procedures (Cont'd)**	
e	During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.	Section 2, Figure 2.1-1
f	If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, wherever this is appropriate.	Section 5.5, Section 7.4, Section 5.6
g	Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. *[Comment: Unless the owner or operator can demonstrate, in accordance with § 261.3(c) or (d) of this chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this chapter].*	Section 7.3, Section 5.5
h	The emergency coordinator must ensure that, in the	-----

	affected areas(s) of the facility:	
h(1)	No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and	Section 7.4, Section 5.5, Section 5.6
h(2)	All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.	Section 5.4, Section 5.5
i	The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.	Figure 3.1-6, Section 8.3
j	The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:	Section 8.3
j(1)	Name, address, and telephone number of the owner or operator;	Section 8.3
j(2)	Name, address, and telephone number of the facility;	Section 8.3
j(3)	Date, time, and type of incident (e.g., fire, explosion);	Section 8.3

APPENDIX F Last revised: February 2006

ACRONYMS AND 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
CO_2	Carbon Dioxide
COTP	Captain of the Port (USCG)
CRZ	Contamination Reduction Zone
CWA	Clean Water Act of 1977 (Federal)
EAP	Emergency Action Plan
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EPA	U. S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ERAP	Emergency Response Action Plan
ERP	Emergency Response Plan
ERT	Emergency Response Team
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
FRT	Facility Response Team
FWPCA	Federal Water Pollution Control Act of 1972
GIS	Geographic Information System
GPM	Gallons Per Minute
HAZMAT	Hazardous Materials
HMIS	Hazardous Material Information System
IC	Incident Commander
ICS	Incident Command System

IMT	Incident Management Team
JIC	Joint Information Center
LEL	Lower Explosive Limit

F.1 ACRONYMS, CONTINUED

LEPC	Local Emergency Planning Committee
LEPD	Local Emergency Planning District
LNG	Liquid Natural Gas
LPG	Liquefied Petroleum Gas
MSDS	Material Safety Data Sheets
MTR	Marine Transportation Related
N/A	Not Applicable
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NIIMS	National Interagency Incident Management System
NM	Nautical Miles
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center
NRDA	National Resource Damage Assessment
NRT	National Response Team
OBA	Oxygen Breathing Apparatus
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator/Commander
OSHA	Occupational Safety and Health Administration (USDL)
PHMSA	Pipeline and Hazardous Materials Safety Administration (DOT)
PPE	Personal Protective Equipment
PREP	(National) Preparedness for Response Exercise Program
QI	Qualified Individual
RCRA	Resource Conservation and Recovery Act of 1976
RQ	Reportable Quantity
SARA	Superfund Amendments and Reauthorization Act
SCADA	Supervisory Control and Data Acquisition (System)
SCBA	Self Contained Breathing Apparatus
SDWA	Safe Drinking Water Act of 1986
SERC	State Emergency Response Commission
SETS	Safety Environment and Training Services

SI	Surface Impoundment
SIC	Standard Industrial Classification (Code)
SOSC	State On-Scene Coordinator
SPCC	Spill Prevention, Control, and Countermeasures (Plan)
SSC	Scientific Support Coordinator (NOAA)
UCS	Unified Command System
UEL	Upper Explosive Limit

F.1 ACRONYMS, CONTINUED

USACOE	U. S. Army Corps of Engineers
USCG	U. S. Coast Guard
USDOD	U. S. Department of Defense
USDL	U. S. Department of Labor
USDOE	U. S. Department of Energy
USDOI	U. S. Department of the Interior
USDOJ	U. S. Department of Justice
USDOT	U. S. Department of Transportation
USFWS	U. S. Fish and Wildlife Service (USDOI)
USGS	U. S. Geological Survey (USDOI)

F.2 DEFINITIONS

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

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

Average Most Probable Discharge **(USCG)**
A discharge of the lesser of 50 barrels (2100 gallons) or one percent of the volume of the worst case discharge.

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

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

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

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

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

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

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

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

F.2 DEFINITIONS, CONTINUED

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.

F.2 DEFINITIONS, CONTINUED

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

Dispersants
Those chemical agents that emulsify, disperse, or solublize oil into the water column or promote the surface spreading of oil slicks to facilitate dispersal of the oil into the water column.

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

Environmentally Sensitive Areas
Streams and water bodies, aquifer recharge zones, springs, wetlands, agricultural areas, bird rookeries, endangered or threatened species (flora and fauna) habitat, wildlife preserves or conservation areas, parks, beaches, dunes, or any other area protected or managed for its natural resource value.

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

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

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

Federal Fund
The oil spill liability trust fund established under OPA.

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

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

F.2 DEFINITIONS, CONTINUED

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

Foam

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

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

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

Hazardous Waste
Any solid waste identified or listed as a hazardous waste by the Administrator of the EPA pursuant to the federal Solid Waste Disposal Act, as amended by the Resources Conservation and Recovery Act (RCRA), 42 U.S.C., Section 6901, et seq as amended. The EPA Administrator has identified the characteristics of hazardous wastes and listed certain wastes as hazardous in Title 40 of the Code of Federal Regulations, Part 261, Subparts C and D respectively.

Higher Volume Port Area
Ports of:

- Boston, MA
- New York, NY
- Delaware Bay and River to Philadelphia, PA
- St. Croix, VI
- Pascagoula, MS
- Mississippi River from Southwest Pass, LA to Baton Rouge, LA
- Louisiana Offshore Oil Port (LOOP), LA
- Lake Charles, LA
- Sabine-Nachez River, TX
- Galveston Bay and Houston Ship Channel, TX
- Corpus Christi, TX
- Los Angeles/Long Beach Harbor, CA
- San Francisco Bay, San Pablo Bay, Carquinez Strait, Suisun Bay to Antioch, CA
- Straits of Juan de Fuca and Puget Sound, WA
- Prince William Sound, AK

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

F.2 DEFINITIONS, CONTINUED

Hyperthermia
A dangerously high fever that can damage nerve centers. This condition can result from

exposure to excessive heat over an extended period of time.

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

Incident Commander (IC)
The one individual in charge at any given time of an incident. The Incident Commander will be responsible for establishing a unified command with all on-scene coordinators.

Incident Command System
A method by which the response to an extraordinary event, including a spill, is categorized into functional components and responsibility for each component assigned to the appropriate individual or agency.

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

Interim Storage Site
A site used to temporarily store recovered oil or oily waste until the recovered oil or oily waste is disposed of at a permanent disposal site. Interim storage sites include trucks, barges, and other vehicles, used to store waste until the transport begins.

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

Lead Federal Agency
The agency which coordinates the federal response to incidents on navigable waters. The lead Federal agencies are:

- **U. S. Coast Guard (USCG):** Oil and chemically hazardous materials incidents on navigable waters
- **Environmental Protection Agency (EPA):** Oil and chemically hazardous materials incidents on most inland waters and in the inland zone

Lead State Agency
The agency which coordinates state support to Federal and/or Local governments or assumes the lead in the absence of a Federal spill response.

Lower Flammable Limit
Minimum flammable concentration of a particular gas in the air.

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.

F.2 DEFINITIONS, CONTINUED

Maximum Most Probable Discharge (USCG)
A discharge of the lesser of 2,500 barrels or ten percent of the volume of a worst case discharge.

Medium Discharge **(EPA)**
Same as maximum most probable discharge.

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

Nearshore Area
The area extending seaward 12 miles from the boundary lines defined in 46 CFR Part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area extending seaward 12 miles from the line of demarcation (COLREG) lines) defined in '80.740 - 80.850 of Title 33 of the CFR.

Non-Persistent or Group I Oil
A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions:

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

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

Offshore Area
The area beyond 12 nautical miles measured from the boundary lines defined in 46 CFR Part 7 extending seaward to 50 nautical miles, except in the Gulf of Mexico. In the Gulf of Mexico it is the area beyond 12 nautical miles of the line of demarcation (COLREG lines) defined in '80-740 - 80.850 of Title 33 of the CFR extending seaward to 50 nautical miles.

Oil or Oils
Naturally occurring liquid hydrocarbons at atmospheric temperature and pressure coming from the earth, including condensate and natural gasoline, and any fractionation thereof, including, but not limited to, crude oil, petroleum gasoline, fuel oil, diesel oil, oil sludge, oil refuse, and oil mixed with wastes other than dredged spoil. Oil does not include any substance listed in Table 302.4 of 40 CFR Part 302 adopted August 14, 1989, under Section 101(14) of the Federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by P.L. 99-499.

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

Operating Area
The rivers and canals, inland, nearshore, Great Lakes, or offshore geographic location(s) in which a facility is handling, storing, or transporting oil.

Operating Environment
Rivers and canals, inland, Great Lakes, or ocean. These terms are used to define the conditions in which response equipment is designed to function.

F.2 DEFINITIONS, CONTINUED

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

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

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

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

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

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

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

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

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

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

F.2 DEFINITIONS, CONTINUED

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

Skimmers
Mechanical devices used to skim the surface of the water and recover floating oil. Skimmers fall into four basic categories (suction heads, floating weirs, oleophilic surface units, and hydrodynamic devices) which vary in efficiency depending on the type of oil and size of spill.

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

Small Discharge (EPA)
Same as average most probable discharge.

Sorbents
Materials ranging from natural products to synthetic polymeric foams placed in confined areas to soak up small quantities of oil. Sorbents are very effective in protecting walkways, boat decks, working areas, and previously uncontaminated or cleaned areas.

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

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

State Emergency Response Commission (SERC)
A group of officials appointed by the Governor to implement the provisions of Title III of the Federal Superfund Amendments and Reauthorization Act of 1986 (SARA). The SERC approves the State Oil and Hazardous Substance Discharge Prevention and Contingency Plan and Local Emergency Response Plans.

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

Support Zone
Same as cold zone, an area free of contaminants so that personal protection equipment (PPE) is

not required for personnel working in this area. Command functions and supporting operations are carried out here.

Tornado Warning
A tornado has been sighted.

Tornado Watch
Conditions are favorable for tornados to form.

F.2 DEFINITIONS, CONTINUED

Unified Command
The method by which local, state, and federal agencies will work with the Incident Commander to:

- Determine their roles and responsibilities for a given incident
- Determine their overall objectives for management of an incident
- Select a strategy to achieve agreed upon objectives
- Deploy resources to achieve agreed-upon objectives

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

Waste
Oil or contaminated soil, debris, and other substances removed from coastal waters and adjacent waters, shorelines, estuaries, tidal flats, beaches, or marshes in response to an unauthorized discharge. Waste means any solid, liquid, or other material intended to be disposed of or discarded and generated as a result of an unauthorized discharge of oil. Waste does not include substances intended to be recycled if they are in fact recycled within 90 days of their generation or if they are brought to a recycling facility within that time.

Wildlife Rescue
Efforts made in conjunction with federal and state agencies to retrieve, clean, and rehabilitate birds and wildlife affected by an oil spill.

APPENDIX G Last revised: February 2006

ADDITIONAL INFORMATION

- Permeability
- San Antonio SPCC PE Cert March 2010
- Secondary Containment

FLINT HILLS RESOURCES™

San Antonio

Emergency Response Action Plan

Developed by:

TECHNICAL RESPONSE PLANNING CORPORATION

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San Antonio ERAP - 1

EMERGENCY RESPONSE ACTION PLAN

Last revised: September 1, 2011

EMERGENCY RESPONSE ACTION PLAN, CONTINUED

1.0 INTRODUCTION

1.1 Purpose / Scope of Plan

This San Antonio Emergency Response Action Plan (ERAP) provides guidelines to assist in managing an emergency. The primary goal of this Plan is to provide tools to enable an efficient, coordinated, and effective response to emergencies.

The ERAP is not meant to replace common sense or actions not specifically described herein. Responders should continually evaluate the effectiveness of actions called for in this Plan and make the appropriate adjustments based on past experience and training.

This ERAP contains tactical response plans that identify site-specific potential response strategies. Response strategies, equipment and manpower requirements, and site conditions are based on conditions that were present during site assessments. Actual conditions at the time of a response may vary significantly and may necessitate the need for a different strategy and/or equipment requirements. The strategies and equipment lists contained in this Plan should be used as guidelines only.

This document is intended to satisfy the requirements of 29 CFR 1910.38(a)(2) and 1910.120(l)(2) (OSHA Emergency Response Plan and Emergency Action Plan) and 40 CFR Part 112.20 (EPA Emergency Response Action Plan). Cross-references for these regulations are located in **APPENDIX E** of the Spill Response Plan.

1.2 Plan Review and Updating Procedures

The ERAP will be reviewed and modified as appropriate to address new information.

Plan revisions will be numbered sequentially and entered on the Record of Changes Form. The change numbers, date, and description of change will also be entered on the form. These changes are then to be distributed to all plan holders on the Distribution List.

1.3 Facility Description

The facility is a bulk fuel storage and distribution terminal. The materials handled at the terminal include various grades and types of gasoline, ethanol, diesel fuel, and fuel additives.

FIGURE 1-1 - FACILITY AREA MAP

2.0 RESPONSE STEPS

2.1 SPILL / RELEASE RESPONSE

RESPONSE ACTION	
First Person to Discover Spill	
Assume role of Incident Commander, will not relinquish this position until formally passed on.	☐
Take appropriate personal protective measures (EH&S Work Permit).	☐
Eliminate possible sources of ignition in the vicinity of the spill (use E-Stops if	☐

applicable).	
Call 911 if appropriate.	☐
Immediately notify Qualified Individual (QI), Supervisory Personnel, and Control Center, if necessary, of the incident.	☐
Make internal notification, call for resources as needed (**FIGURE 3-5**).	☐
If necessary, evacuate or remove nonessential personnel and any general public within the response area.	☐
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.	☐
Call out spill response contractors (**FIGURE 3-5**).	☐
Incident Commander	
Confirm or conduct more extensive assessment of health and safety hazards (EH&S work permit). For multiple responders, geographic areas, or more complex responses, Site Safety plan may be needed.	☐
Provide or Confirm Security of area (as necessary). Have nonessential personnel or any general public evacuated. Consider local authorities (police and fire departments) to accomplish the site control recommended.	☐
If the incident is caused by a security event, consider notification to law enforcement personnel and corporate security personnel as well as advising the security officer to take steps to preserve the scene.	☐
Call out or confirm Oil Spill Response Contractors (OSRO) or Company-owned spill response resources (**FIGURE 3-5**).	☐
As necessary, establish ICS/UCS for Response. It may be necessary to call out members of the IMT. Ensure response objectives are established for emergency and that response activities are being activated.	☐
Make or ensure appropriate notifications have been made; may need to recruit personnel from IMT such as Government Liaison and assign within the ICS. • National Response Center (800) 424-8802 • External Regulatory notifications (**FIGURE 3-4**) • Make appropriate internal notifications (**FIGURE 3-3**)	☐
If safe to do so, direct responders to eliminate potential ignition sources in the vicinity of the spill including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.	☐
If safe to do so, direct responders to eliminate, control, and "isolate" 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.	☐
If safe to do so, direct responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.	☐

2.1 SPILL / RELEASE RESPONSE, CONTINUED

RESPONSE ACTION	
Incident Commander, Continued	
Consider applying foam over the product, using water spray to reduce vapors, grounding equipment handling the oil, and using non-sparking tools.	☐

If the incident is caused by a security event, consider notification to law enforcement personnel and corporate security personnel as well as advising the security officer to take steps to preserve the scene.	☐
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.	☐
If safe to do so, deploy containment/recovery equipment (OSRO or Company-owned) based on release impact.	☐
Maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.	☐
Once deployment of response equipment has been commenced, initiate recovery of product.	☐
Notify Local Emergency Responders (as appropriate). Obtain the information necessary to complete the Oil Spill Report Form (**FIGURE 3-2**).	☐
Ensure drug/alcohol testing completed per DOT 199 if applicable (alcohol within 2 hours or max of 8 hours, drug within 32 hours). See DNet for a list of approved Lab Corp Collections Sites.	☐
Evaluate personnel requirements for the initial cleanup. Consider what the operational periods will be necessary and begin planning for the shift/crew replacement.	☐
Initiate spill tracking and surveillance operations. Determine extent of release. Estimate volume of spill utilizing information in **SECTION 2.1.3** of the Spill Response Plan or appropriate means.	☐

SITE SPECIFIC ACTIONS	
DOCUMENT ACTIONS TAKEN	
Facility drainage and secondary containment will be adequate to contain a spill of small or medium size preventing it from reaching Rosillo Creek. Once the spill has been contained, resources are present at the facility to recover spilled product, safety conditions permitting.	☐
If unable to contain spill to facility property, refer to SECTION 6.8 of the FRP or SECTION 9.0 of the ERAP for location of booming/fill dirt strategy.	☐
Once deployment of response equipment has been completed, initiate recovery of product.	☐
Upon arrival of IMT, assure information is accurate and complete prior to being released.	☐
Assure proper documentation has been completed from initial discovery of spill to finish (**SECTION 5** of the Spill Response Plan).	☐

2.2 EVACUATION

EVACUATION CHECKLIST	
TASK	
Request assistance from off-site agencies; convey Command Post's location	☐
Assemble personnel at predetermined safe location: upwind/up gradient of release (assembly area), **FIGURE 6-2**	☐

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

2.2 EVACUATION, CONTINUED

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Stored material location	• Located in oil storage area • Identified in facility Plot Plan (**FIGURE 1-5** of the Spill Response Plan)
Spilled material hazards	• Product characteristics and hazards are identified in **APPENDIX D** of the Spill Response Plan.
Water currents, tides or wave conditions	• This is an inland facility and these factors do not impact evacuation of this facility.
Evacuation routes	• Routes are summarized on Evacuation Plan Diagram (**FIGURE 6-2**) • Criteria for determining safest evacuation routes from facility may include: wind direction, potential exposure to toxins and carcinogens, intense heat, potential for explosion/fire, and blockage of planned route by fire, debris, or released liquid
Alternate evacuation routes	• Alternate routes may exist; refer to Evacuation Plan Diagram (**FIGURE 6-2**)
Injured personnel transportation	• Emergency services can be mobilized to the facility (**FIGURE 3-4**)
Alarm/Notification system location	• The alarm/notification system sounds at the office building.
Community evacuation plans	• Company may request local police, county sheriff and/or state police assistance (**FIGURE 3-4**). Community evacuations are the responsibility of these agencies.
Spill flow direction	• South • Identified in facility drainage diagram (**FIGURE 6-1**)

Prevailing wind direction and speed	• North to Southeast at 8 to 10 mph • Because wind direction varies with weather conditions, consideration for evacuation routing will depend in part on wind direction
Emergency personnel/response equipment arrival route	• Will be determined at the time of the incident depending on the individual circumstances. • Directions to nearest medical facility provided below

2.2 EVACUATION, CONTINUED

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Centralized check-in area (Personnel assembly area)	• Primary check-in is in front of the main office at the parking lot. The secondary check-in point is at Pop Gunn St. and East Houston. • Supervisor/Senior employee is responsible for head count
Mitigation Command Center location	• Initial Command Center located at will be determined at the time of the incident, but the office building will generally be used unless it is not a safe location. • Mobile Command Posts may be established as necessary
Facility Shelter Location	• Will be determined at the time of the incident. • Not a safe harbor from fires, explosions, vapor clouds, or other significant emergencies; however, may be used for temporary shelter from inclement weather
Directions to nearest medical facility	Directions to Brooke Hospital, San Antonio : • Start out going south on Pop Gunn Dr toward E Houston St./ FM 1346. Turn left onto E Houston St./ FM 1346 E. Turn left onto NE I-410-Loop. Merge onto I-410 N via the ramp on the Left toward I-10. Merge onto I-35 S/ US-81 S via EXIT 31 on the Left toward San Antonio/ Binz-Englemann Rd. Take the exit toward FM-78 / KIRBY. Turn Slight Left onto NE I-410-LOOP. NE I-410-Loop becomes N I-35/ N Pan AM EXPY/ N PANAM EXPY. Turn Left onto Binz-Engleman Rd. Turn Right onto George C Beach Ave. Turn Left onto Roger Brooke Dr. Make a U-turn at Roger Brooke Dr onto Roger Brooke Dr. Brooke Army Medical Center is located at 3851 Roger Brooke Dr # 3600, Fort Sam Houston, TX 78234, US.

2.3 LIGHTNING

LIGHTNING CHECKLIST	
TASK	
Maintain equipment grounding systems to dissipate the effects of a lightning strike.	☐
Provide lightning arrestors on electrical equipment throughout the system.	☐
During thunderstorms personnel are to avoid the following: • Storage Tanks • Pumping Equipment • Being in contact with or in close proximity to above ground piping or any non-insulated device attached to the pipeline. • Trees and metal buildings • Open fields • Holding metallic objects	☐
During thunderstorms personnel should be aware of the potential for lightning and remain alert for strikes that may affect the pipeline operation.	☐

Possibly the most frequent effect of lightning is the interruption of electric power or communications to one or more locations on the pipeline. These events are covered in "abnormal" operation procedures described in the Operations Manual.

The most devastating effect of lightning is the striking of a tank and resulting fire. The response to a fire or explosion event is outlined in the "emergency" procedures of the Operations Manual.

2.4 EARTHQUAKES

Earthquakes generally strike without warning, making them very difficult to prepare for. While the initial quake may be unpredictable, there is a certain amount of post-quake activity accompanying most quakes. These procedures should be followed in the aftermath of an earthquake:

The Pipeline Control center has registered with the USGS to receive earthquake notifications within the operational areas of the continental USA. Based on the magnitude and distance of the earthquake the following procedures should be followed in the aftermath:

EARTHQUAKES CHECKLIST	
Stations and Terminal	
If an earthquake is within a 50 mile radius of the asset, the following is completed based on the magnitude.	
2.0 to 2.9 - Pipeline Control Center will notify the station or terminal of the earthquake. Inspect the asset at the next scheduled station walkthrough.	☐
3.0 to 3.9 - Pipeline Control Center will issue a "Priority 3" notification for a visual inspection of the station.	☐
4.0 to 4.9 - Pipeline Control Center will issue a "Priority 2" notification for a visual Inspection of the station.	☐
If an earthquake is within a 100 mile radius of the asset, the following is completed based on the magnitude.	

5.0 to 5.9 - Pipeline Control Center will issue a "Priority 2" notification for a visual Inspection of the station.	☐
> 6.0 - Pipeline Control Center will issue a "Priority 0" notification to shut down the station until a visual inspection is completed.	☐
Underground Pipelines	
If an earthquake is within a 100-mile radius of the asset, the following is completed based on the magnitude.	
5.0 to 5.9 - Pipeline Control Center will notify the PCC communicator scenario of the earthquake; plus reduce to 50% MOP and monitor for 12 hours. Operation Management will evaluate what other actions may be necessary on a case-by-case basis.	☐
> 6.0 - Pipeline Control Center will notify the PCC communicator scenario of the earthquake and shut the pipeline until a visual inspection is completed; plus operate at 50% MOP for 12 hours once the pipeline is brought back on.	☐

Priority 3 = means within 24-hours of receiving notice of the earthquake occurrence and coupled with the control center is not registering any alarms.
Priority 2 = means as soon as feasible, safe, and practical; to coincide with the earliest available daylight to give the best viewing possible and coupled with the control center is not registering any alarms.
Priority 1 = registers a high sense of urgency; contact pipeline operator on call-out whatever the time of day or night it may be.
Priority 0 = registers the highest sense of urgency, Shut station down and contact pipeline operator on call-out whatever the time of day or night it may be.

2.5 TORNADO

TORNADO CHECKLIST	
TASK	
Monitor news media reports (**FIGURE 3-6**) • Tornado watch means conditions are favorable for tornadoes • Tornado warning means a tornado has been sighted	☐
When a tornado warning is issued, sound the local alarm	☐
Have location personnel report to the designated area	☐
Account for personnel on duty	☐
Take shelter: • Go to an interior room on the lowest floor or designated storm shelter • Get under a sturdy piece of furniture • Use your arms to protect head and neck	☐
If the facility is damaged by the tornado, notify Supervisory Personnel	☐
Go to the scene of the incident to evaluate the situation • Be aware of broken glass and downed power lines	

• Check for injuries • Use caution entering a damaged building	☐
Update Supervisory Personnel/Management	☐
Perform Initial Response Actions functions as stated in **SECTION 2.1**	☐
Conduct post-emergency evaluation and report	☐

2.6 HURRICANE

Since hurricanes are very erratic in nature, Hurricane Preparedness Plan SOP (Standard Operating Procedures) will be implemented and followed when a storm path is predicted for a particular operational area. The SOP will provide procedures for a safe and orderly shutdown of operational assets within the predicted storm path. The procedures will also enact an organized tracking effort for hurricane preparedness activities which will allow for employees to handle company as well as their own domestic hurricane preparedness needs.

The Hurricane Preparedness Plan (SOP) is divided into two sections based on potential weather survey tracking forecasts and the timetables predicted for landfall within operating assets.

HURRICANE CHECKLIST	
TASK	
Tropical Storm / Hurricane forms and is being tracked by National Weather Surveys	
Hurricane Season begins, general coastal areas heighten awareness to storm reports.	☐
Tropical Storm / Hurricane forms or enters general area of operational assets.	☐
Hurricane Preparedness Standard Operating Procedures Implemented	
Tropical Storm / Hurricane is 48 - 36 hours away and path is predicted in the direction of the operational assets (Threshold parameter to implement the Hurricane Preparedness Plan (SOP).	☐
Hurricane Preparedness Plan (SOP) is implemented.	☐

2.7 FLOOD

FLOOD CHECKLIST	
TASK	
When conditions warrant, perform continuous monitoring of the situation by listening to radio and/or television reports • Flash flood watch means flooding is possible • Flash flood warning means flooding is occurring or is imminent	☐
As appropriate, update Supervisory Personnel	☐

Establish an evacuation plan (**SECTION 2.2**)	☐
Take preliminary actions to secure the facility before flooding and mandatory evacuation	☐
Consider having sandbags brought to sites that could be affected by the flooding	☐
Consider obtaining portable pumps and hoses from local suppliers or from other petroleum service locations in the area	☐
Consider removing product from underground storage tanks, sumps, and separators (if applicable). Consider replacing with water to prevent them from floating out of the ground	☐
Keep at least a normal bottom in above ground tankage, more if possible	☐
Plug rack drains and facility drains connected to the sump	☐
Consider anchoring all bulk additive tanks, fuel barrels, empty drums, and propane tanks (if applicable)	☐
Notify Supervisory Personnel/Management that the facility will be closed	☐
Consider shutting off high voltage power and natural gas lines	☐
Close valves on product and additive storage tanks	☐
Before evacuation, know where employees will be residing and obtain phone numbers so they can be contacted if additional emergencies occur	☐
Conduct a post-emergency evacuation and report	☐
Maintain hazards awareness: • Structural damage • Downed power lines • Leaking natural gas, water, and sewer lines • Poisonous snakes and other wildlife sheltering in structures, vehicles, and furniture • Avoid direct contact with flood water, mud, and animal carcasses	☐

2.8 MEDICAL

MEDICAL CHECKLIST	
TASK	
Summon Emergency Medical Services (EMS) to the scene (**FIGURE 3-4**)	☐
Do not move the patient unless a situation (such as a fire) threatens patient's life	☐
If trained, provide first aid until the EMS arrive at the scene	☐
As the situation warrants, try to stop the bleeding and keep the patient's breathing until the EMS arrives at the scene	☐
The rescuer's role includes: • Removing the patient from any situation threatening patient's life or the	

lives of rescuers • Correcting life-threatening problems and immobilizing injured parts before transporting the patient • Transporting the patient in a way that minimizes further damage to injured parts • Administering essential life support while the patient is being transported • Observing and protecting the patient until medical staff can take over • Administering care as indicated or instructed	☐

2.9 SABOTAGE

(b) (7)(F), (b) (3)

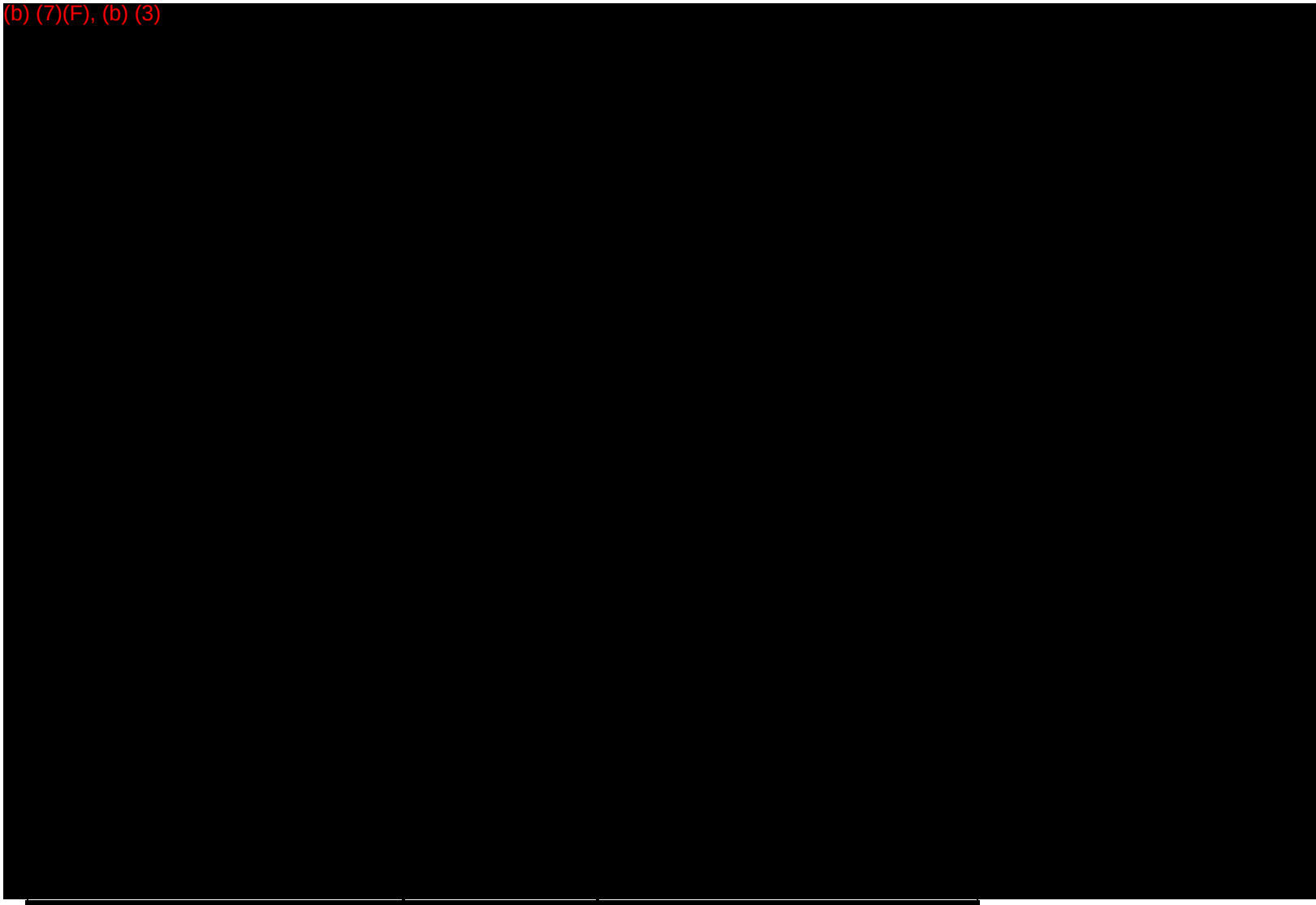
[redacted]

2.10 BOMB THREAT

(b) (7)(F), (b) (3)

[redacted]

(b) (7)(F), (b) (3)



(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

2.11 FIRE AND/OR EXPLOSION

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

The first responder's initial objective is site management.

FIRE AND/OR EXPLOSION CHECKLIST	
TASK	
At a manned facility	
Evaluate the situation; approach cautiously from upwind; do not rush in	☐
Notify the local police and fire departments (as appropriate)	☐
Notify Supervisory Personnel	☐
Appropriately trained personnel may attempt to extinguish the fire if it is in the incipient (early) stage and **if it can be done safely**	☐
If the fire/explosion is a result of a pipe rupture, isolate product release by closing valves	☐
Undertake basic site control:	

• Make an assessment of hazards • Isolate the area • Keep people away from the scene and outside the safety perimeter as per the evacuation plan (**SECTION 2.2**) • Establish safety zones and escape routes	☐
Respond to the fire: • Establish a Command Post and lines of communication • Maintain site control • Establish Incident Command/Unified Command as necessary (**SECTION 4.4** of the Spill Response Plan)	☐
Call in additional resources if on-scene personnel and equipment are inadequate to handle the emergency (**FIGURE 3-3**, **FIGURE 3-5**)	☐
Conduct a post-emergency evaluation (**SECTION 8.3** of the Spill Response Plan) and report	☐

2.11 FIRE AND/OR EXPLOSION, CONTINUED

Your first consideration is always the safety of people in the immediate area, including your own. **The first responder's initial objective is site management.**

FIRE AND/OR EXPLOSION CHECKLIST, CONTINUED	
TASK	
At an unmanned facility	
Handle the call	☐
Notify the local police and fire departments (as appropriate)	☐
Notify Supervisory Personnel	☐
Go to the incident scene to evaluate the situation; approach cautiously from upwind; do not rush in	☐
Undertake basic site control: • Make an assessment of hazards • Evaluate the area for visitors or personnel in the area prior to the event • Isolate the area • Keep people away from the scene and outside the safety perimeter as per the evacuation plan (**SECTION 2.2**) • Establish safety zones and escape routes	☐

Update Supervisory Personnel/Management	☐
If the fire/explosion is a result of a pipe rupture, isolate the product release by closing valves	☐
Respond to the fire: • Establish a Command Post and lines of communication • Maintain site control • Establish Incident Command/Unified Command as necessary (**SECTION 4.4** of the Spill Response Plan)	☐
Call in additional resources if on-scene personnel and equipment are inadequate to handle the emergency (**FIGURE 3-3**, **FIGURE 3-5**)	☐
Conduct a post-emergency evaluation (**SECTION 8.3** of the Spill Response Plan) and report	☐

2.12 RELEASE WITH A FLAMMABLE VAPOR CLOUD

Once a Flammable vapor cloud is detected, the need for assessment of the situation is paramount in implementing and sustaining an effective response. In every case, we must collect accurate initial information (**FIGURE 3-1**). The information acquired is passed along to responsible company officials to ensure proper actions are taken.

As the situation dictates, a thorough and accurate assessment is necessary to determine specific activities required to respond to the situation.

INCIDENT ASSESSMENT	
Person Assessing the Incident	
Approach any suspected emergency incident or suspected release cautiously.	☐
Take appropriate personal protective measures (Do not enter any areas without proper Personal Protective Equipment (PPE).	☐
Eliminate possible sources of ignition in the vicinity of the release (if applicable, use Emergency-Stops).	☐
Initiate a general site assessment giving emphasis to the following:	
• Immediate danger to the general public	☐
• Immediate danger to the environment (e.g. waterways, wildlife)	☐
• Identify significant impact areas (e.g. highways, railroads, or commercial businesses)	☐
• Identify topographic features that could impact the migration of the release	☐
• Identify any municipalities or public areas such as churches, parks, etc.	☐
• Identify other requirements that will be necessary when inside third party facilities.	☐

• Make notifications and call for resources as needed. (**SECTION 3.0**)	☐
INITIATE THE INITIAL INCIDENT RESPONSE AND SPILL MITIGATION PROCEDURES DESCRIBED IN THIS PLAN (SECTION 2.1)	☐

2.12 RELEASE WITH A FLAMMABLE VAPOR CLOUD, CONTINUED

INCIDENT ASSESSMENT	
Flammable Vapor Cloud Release - General Response Guide	**Comments**
STAY UP WIND, UP HILL, AND UP STREAM OF THE VAPOR CLOUD AND THE SOURCE. Assess wind direction and vapor cloud movement. Be aware of possible weather changes that could affect cloud movement.	
Sound the Alarm; Alert personnel and affected public as soon as possible after discovering that a flammable or otherwise hazardous vapor cloud is present.	
Determine Extent and Coverage of the Vapor Cloud. A responder may use Audio, Visual and Olfactory (AVO) Methods along with wind direction and handheld monitors to determine the initial extent and coverage of a vapor cloud. (**Section 2.1.5 Spill Mitigation Procedures** of the Spill Response Plan).	
The Emergency Response Guidebook (ERG) - can also supply generic and specific hazard information regarding public safety for vapor clouds emanating from a flammable gas, HVL or other hazardous liquid release.	
Site Management and Control; If "Local Emergency Responders" such as fire or police are already on scene, ensure operations are coordinated and unified. If these resources are not on site; request emergency and medical support services as needed.	
Vacate the Hazard Area - Direct non-essential persons to move in a crosswind direction away from the release to the designated muster point for roll call and further instructions. Consider protective actions (such as evacuation) within the specified distance upwind of the release and any identified Vapor Cloud.	
Establish Exclusion Zone - Command the physical layout of the incident by establishing a "Hot zone" which safely encompasses the Vapor Cloud area. The physical layout of this exclusion zone should be communicated to all personnel operating on the site	
Only qualified emergency service or rescue personnel should consider incident site entry as safety conditions and the On-scene Incident Commander allow.	
Determine the concentrations of toxic or flammable gases present using both fixed monitors (if available) and portable intrinsically safe instruments.	
Defensive Operations are always desirable over Offensive tactics if they accomplish the same objectives. Only the On-Scene Incident Commander can deem it necessary to enter a "Hot Zone" and when approved this should be done only by a trained and qualified Hazardous-Material Team with adequate resources.	
If a release is occurring, fixed water monitors, and/or sprinkler or deluge systems can be activated to dilute, disperse, and "scrub" the vapors and	

prevent their advancement to uncontrolled areas (This tactic is situation dependent and may not be the appropriate tactic for all situations, i.e. dealing with lighter than air gases or certain HVL's).	
Manage water supply, and control runoff/drainage, care should be taken to activate only those water systems that can effectively mitigate vapors.	
Vapor Cloud Surveillance. Continuous surveillance and evaluation of the extent and coverage of Vapor Cloud may be accomplished through various methods. Audio, Visual and Olfactory (AVO) Methods along with handheld monitors may be used to further refine the determined extent and coverage of a vapor cloud. As resources and personnel arrive, additional portable and fixed positions monitors can be set up to continuously monitor, gauge and predict the extent and coverage of the vapor cloud. These may include, but not limited to four gas monitors with LEL capability and Area Monitors	
SECONDARY RESPONSE ACTIONS (Refer to IMT job descriptions in **SECTION 4.6** of the Spill Response Plan).	
FACILITY SPECIFIC RESPONSE CONSIDERATIONS (Refer to **SECTION 6** of the Spill Response Plan for maps, tactical plans, and sensitivity information.	

3.0 NOTIFICATIONS

There are two classes of emergency events, "reported" and "confirmed."

A "reported" emergency is either an event reported by someone other than a company employee and which cannot be immediately confirmed or a pressure or flow rate change that is not confirmed by a second source.

A "confirmed" emergency is an event reported by a company employee or reported by someone other than a company employee and "confirmed" by a second source. Any event that threatens lives or public safety if immediate action is delayed, is to be considered a confirmed emergency.

In either case, upon receiving notification about an emergency event, the company employee will take immediate actions (**SECTION 2**) and begin notification procedures based on the situation.

The general “Internal Incident Notification Sequence” is as follows:

- **First:** Isolate the source and then call emergency services
- **Second:** Call 1-877-376-0532:
- **Third:** Enter User ID: 4157 #:
  - Enter PIN: 5624# (KOCH)
- **Fourth:**:
  - Scenario ID 315: KPL / FHR STX Joint Response, Report of an Incident
  - Scenario ID 311: FHR South Texas, Report of an Incident
- **Fifth:**:
  - Press 2 to record the message
  - Press 3 to start the scenario (activate). You will hear the system say "The scenario is building" then press # to end the call.

Information required (in order below):

1 - Your name and phone number, type of incident reported and location

2 - Supervisor name.

3 - Time and Date

4 - Product released and estimated quantity

5 - Source of release

6 - Affected medium (Land or Water)

7 - Affected employee (if applicable)

8 - Has area been secured?

Note: Remember -

1) **Safety is our #1 concern**
2) **Report only the facts!**

FIGURE 3-1 - SUPERVISOR'S IMMEDIATE REPORT

The current version of the Supervisor's Immediate Report can be found in the compliance section of the Terminals Webpage under Incident Reporting.

FIGURE 3-2 - OIL SPILL REPORT FORM

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION**

<table>
<tr><th colspan="4">INVOLVED PARTIES</th></tr>
<tr><th colspan="2">Reporting Party</th><th colspan="2">Suspected Responsible Party</th></tr>
<tr><td colspan="2">Name:</td><td colspan="2">Name:</td></tr>
<tr><td rowspan="2">Phone:</td><td>(Day)</td><td rowspan="2">Phone:</td><td>(Day)</td></tr>
<tr><td>(Evening)</td><td>(Evening)</td></tr>
<tr><td colspan="2">Position:</td><td colspan="2">Company:</td></tr>
<tr><td colspan="2">Company:</td><td colspan="2" rowspan="6">Organizational Type:
☐ Private Citizen
☐ Private Enterprise
☐ Public Utility
☐ Local Government
☐ State Government
☐ Federal Government</td></tr>
<tr><td colspan="2">Address:</td></tr>
<tr><th colspan="2">Person Discovering Incident</th></tr>
<tr><td colspan="2">Name:</td></tr>
<tr><td colspan="2">Company/Organization:</td></tr>
<tr><td colspan="2">City: State: Zip:</td></tr>
</table>

Were materials released? ☐ Yes ☐ No	Calling for Responsible Party ☐ Yes ☐ No

INCIDENT DESCRIPTION		
Incident Classification: ☐ Tier I (12 hours) ☐ Tier II (36 hours) ☐ Tier III (60 hours)		
Date:	Time: ☐ AM ☐ PM	Weather:
Incident Address/Location:		Latitude: _____ degrees _____ min _____ sec N
		Longitude: _____ degrees _____ min _____ sec W
Mile Post/River Marker:		
City/County:		Distance from City:
State:		Direction from City:
Source and Cause of Incident:		
Storage Tank Type: ☐ Above Ground ☐ Below Ground ☐ Unknown		
Tank Capacity:		Facility Capacity:

MATERIAL INFORMATION

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

Note: Refer to the Incident Database for spill history and spill reporting.

FIGURE 3-2 - OIL SPILL REPORT FORM, CONTINUED

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION**

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

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

ADDITIONAL INFORMATION
Any information about the incident not recorded elsewhere in the report (e.g., duration of spill, treatment or disposal measures).

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

Note: Refer to the Incident Database for spill history and spill reporting.

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24 Hour Number

FACILITY RESPONSE TEAM						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**RESPONSIBILITY DURING RESPONSE ACTION**	**RESPONSE TRAINING TYPE[1]**		

				1	2	3
Randy Grimes Terminal Manager **Qualified Individual**	(210) 666-6621 (Office) 210-296-8374 *(Mobile)	1	Incident Commander	x	x	x
Stephen Lopez Instrument & Electrical Technician	210-662-0807 (Office) (210) 296-9041 *(Mobile)	1		x	x	
Eric Mireles Terminal Operator	(210) 662-0807 (Office) (210) 563-0021 *(Mobile)	1		x	x	
Gary Schweikert Terminal Operator	210-666-6621 (Office) 210-296-8378 *(Mobile)	1		x	x	
Mark Harnandez Operations Technician	210-666-6621 (Office) 512-922-3448 *(Mobile)	1		x	x	

NOTE: Training records will be maintained in accordance with the Company Records Retention Schedule.

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

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**RESPONSIBILITY DURING RESPONSE ACTION**	**RESPONSE TRAINING TYPE[1]**		
				1	**2**	**3**
Lance Baker Operations Manager **Qualified Individual**	(817) 685-3425 (Office) (817) 688-3969 *(Mobile)		Alternate QI, IC, Ops.	x	x	x
Pipeline Control Center (Southern Console)	(800) 666-9045 (Office)					
	281-363-7260					

Katie Stavinoha Director Public Affairs	(Office) 713-459-7340 *(Mobile)		Public Affairs			

EMERGENCY RESPONSE TRAINING TYPE[1]
There are three different types of training described below including HAZWOPER, OPA, and Qualified Individual/Incident Command Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual.

TYPE[1]	DESCRIPTION
1	29 CFR 1910.120 HAZWOPER
2	OPA (Training Reference for Oil Spill Response) All Facility Personnel, IMT, QI Components
3	Qualified Individual/Incident Command Training

NOTE: Refer to **APPENDIX A** of the Spill Response Plan for training dates.

FIGURE 3-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

Note: Notification Forms can only be printed from the Section File (not available in the Forms Navigator)

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
National Response Center (NRC) c/o USCG 2100 2nd Street, Southwest Room 2111-B Washington, DC 20593-0001	(800) 424-8802* (202) 267-2675* (202) 267-1322 (Fax) TDD: (202) 267-4477	
Recommended		
State Agencies		
State Emergency Response Commission (SERC) Texas Divsion of Emergency Management (TCEQ / TGLO / RRC) PO BOX 4087, MSC 0223 Austin, TX 78733	(800) 832-8224 (800) 452-2791 (512) 424-5677	
Texas Department of Parks and Wildlife 4200 Smith School Road Austin, TX 78744	(512) 389-4848	
Texas General Land Office 1700 North Congress Avenue Room 340 Austin, TX 78701	(800) 832-8224 (Spills) (512) 475-1575(Main, not spills)	
Texas Railroad Commission - Office of Pipeline Safety, Austin, Texas	(512) 463-6788 (512) 463-7319	

1701 North Congress Avenue Austin, TX 78701 PO Box 12967 Austin, TX 78711-2967		
Local Agencies		
Bexar Co. LEPC 203 West Nueva Suite 302 San Antonio, TX 78207	(210) 335-0300	
Fire Departments		
San Antonio Fire Department 214 West Nueva San Antonio, TX 78207	(210) 207-7744 911	
Hospitals		
Brooke Army Medical Center 3851 Roger Brooke Dr # 3600 Fort Sam Houston, TX 78234	(210) 916-3400	
Law Enforcement		
Bexar Co. Sheriff Department 203 West Nueva Street Suite 309 San Antonio, Texas 78207	(210) 335-6000 911	
San Antonio Police Department 214 West Nueva San Antonio, TX 78207	(210) 207-7273 911	

FIGURE 3-5 - OIL SPILL RESPONSE CONTRACTORS RESOURCES, AND TELEPHONE NUMBERS

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
USCG Classified OSRO's		
TAS Environmental Services, LP (San Antonio) San Antonio, Texas	888-654-0111 (210) 496-5310 (210) 496-5312 (Fax)	
Eagle SWS, (San Antonio) Cibolo, TX	(210) 566-8366 (210) 566-6247 (Fax)	
Miller Environmental Services, Inc. Corpus Christi, TX	(361) 289-9800 (24-hr) (361) 289-6363 (Fax)	

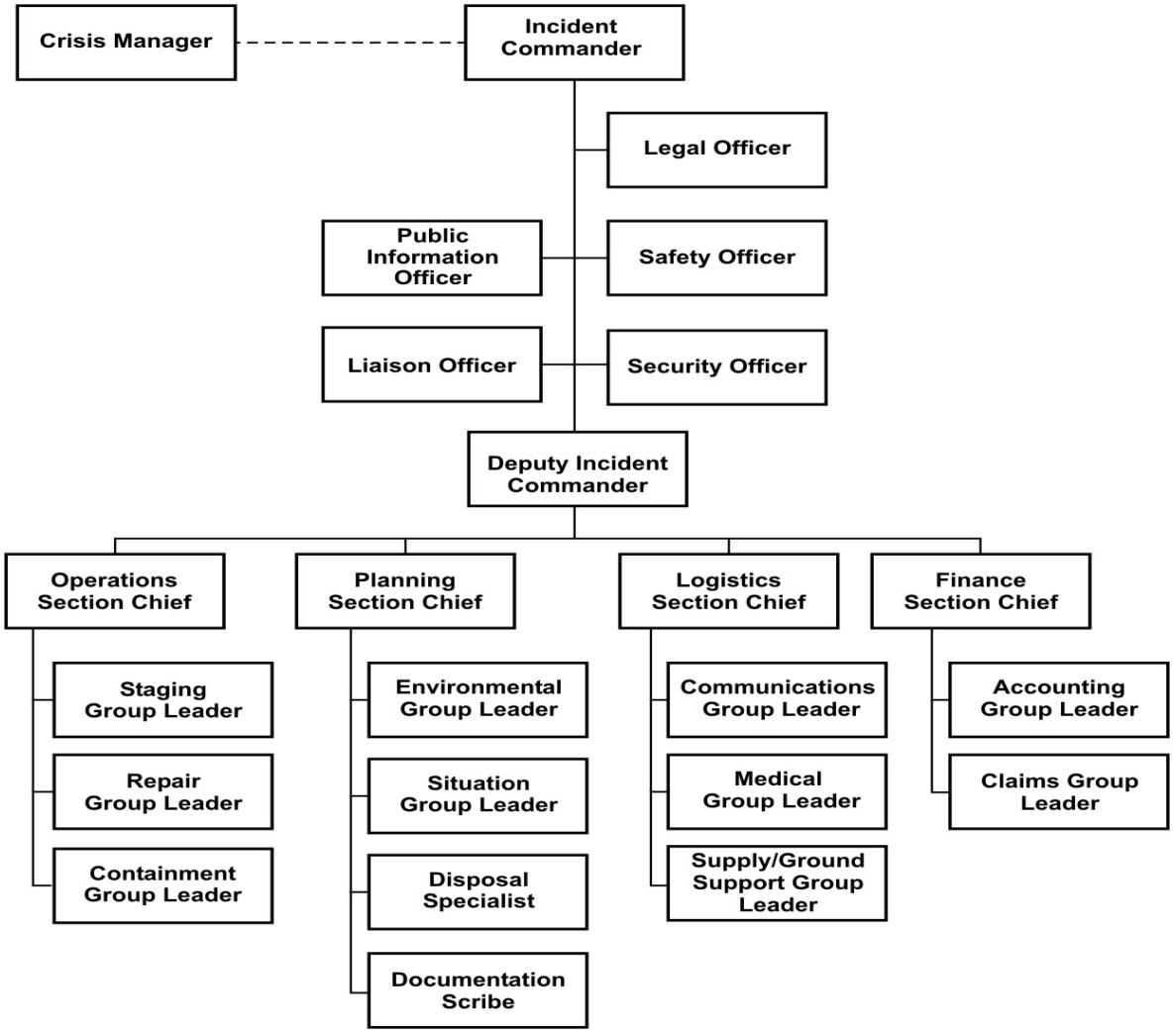
FIGURE 3-6 - ADDITIONAL RESOURCES, NOTIFICATIONS, AND TELEPHONE NUMBERS

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Additional Services		
REISS Remediation 20 Greenway Plaza Houston, TX 77046 Attn. Michael Christopher	(713) 544-3016 (Office) (832) 264-3654 (Cell)	
Laboratories		
Alcor PetroLab, L.L.P. 33 Laboratory Road Floresville, TX 78114	(830) 216-2112 (830) 216-3113	
AnalySys, Inc. 3512 Montopolis Drive Austin, TX 78744	(512) 385-5886 (512) 385-7411 (Fax)	
Southwest Research Institute 6220 Culebra San Antonio, TX 78258	(210) 522-2122 (210) 522-2071	
Neighboring Facilities		
Union Pacific Railroad 1400 Douglas Street Omaha, NE 68179	(888) 877-7267 (24/7 emergency number) (888) 870-8777	
Radio Rentals		
TAS Environmental 14350 Lookout Rd. San Antonio, TX 78233	210-496-5310	
Storage Tanks Rentals and RORO's		
Bakercorp 533 McBride Lane Corpus Christi, TX 78408- Corpus Christi 459 Cargill Road Kilgore,TX 75662- Kilgore 22345 IH 35 South New Braunfels, TX 78132- San Antonio 7818 South Cooper Street Arlington, TX 76001- Dallas	(361) 289-7708 (Corpus Christi) (903) 983-2916 (Kilgore) (817) 608-0576 (Dallas) (830) 606-7788 (San Antonio)	
Vacuum Truck Services		
Alamo Environmental 10843 GulfDale San Antonio, TX 78216	(800) 322-5085 (210) 404-1220	
H & K Vacuum Trucks Inc 1010 Sodville Street Sinton, TX 78387 P.O. Box 1340 Sinton, TX 78387	(361) 364-4311 (361) 364-5920 (Fax) 800-456-9430	
Key Energy 4007 U.S. Highway 77 south	(361) 782-7184 (Dispatch)	

Victoria, TX 77905	(361) 578-1047 (Fax)	
Wildlife Rehabilitation		
Wildlife Rehabilitation and Education 7007 Katy Road Houston, TX 77024 (Must contract through Miller Environmental)	(713) 861-WILD (713) 279-1417 (Oil Spill) (281) 731-8826 (cell phone)	

4.0 RESOURCES

FIGURE 4-1 - RESPONSE TEAM ORGANIZATION CHART*



4.1 INCIDENT MANAGEMENT TEAM (IMT) JOB DESCRIPTIONS AND GUIDELINES

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

- Incident Commander
- Deputy Incident Commander
- Crisis Manager
- Public Information Officer
- Liaison Officer
- Legal Officer
- Safety Officer
- Security Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Disposal Specialist
- Situation Group Leader
- Documentation Scribe
- Logistics Section Chief
- Communications Group Leader
- Medical Group Leader
- Supply/Ground Support Group Leader
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader

INCIDENT COMMANDER

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

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

As soon as practical, the Incident Commander shall conduct a critique of the response. Participants may include Operations Control personnel, Company supervisors and employees, and outside agencies involved in the response. An Incident Debriefing Form is provided in **SECTION 8.3** to document follow-up actions.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Assess the situation and/or obtain an Incident Briefing from prior Incident

Commander.

- ☐ Inform Pipeline Control Center (PCC) to shutdown line, if not already done, leaving downstream stations running until they go down on low suction.
- ☐ Call Operations Section Chief (Local Area Manager) to dispatch his/her team to close the nearest block valves on both side of the affected area. This team first on site to provide ICS with information and to monitor atmosphere, etc. Ensure Operations Section Chief makes communication with local responders (Fire, Police).
- ☐ Call Safety Officer and dispatch to site.
- ☐ Call IMT leaders (planning, logistics, safety, public affairs) to meet at Incident Command (IC), or assign a location near the incident. Dispatch Public Information Officer to site.
- ☐ Call OSRO and dispatch to staging area to meet with Operations Section Chief; OSRO leader to the IC.
- ☐ Fill IMT positions, if not already done, and brief IMT leaders with current information.
- ☐ Assign a Surveillance / Reconnaissance Officer.
- ☐ Establish contact with field Operations Section Chief and start processing information to the IMT; determine new staging area close to incident, if appropriate. Move IC closer to site (if necessary).

INCIDENT COMMANDER, CONTINUED

Responsibilities, Continued:

- ☐ Determine need for evacuations.
- ☐ Establish communications with Corporate Office- Crisis Manager to help.
- ☐ Establish communications with local, state and federal response agencies- Crisis Manger to help.
- ☐ Ensure that all staff leaders are performing their respective group responsibilities.
- ☐ As agency personnel arrive at the IC, ensure they are incorporated into the unified command structure as appropriate.
- ☐ Approve all press releases developed by the Public Information Officer and Crisis Manager before issued to the media. Make sure a written press statement is developed within one hour of the incident.
- ☐ Provide briefings for incident command staff on a timely basis at regular intervals, or as information changes.
- ☐ Remain focused on the big picture; understand the need for long term resources.

After a couple hours into the response, have staff leaders review the Spill Response Plan (**SECTION 4.6** IMT Job Descriptions) bullet points / checklists to ensure we have covered all responsibilities / actions

DEPUTY INCIDENT COMMANDER

The Deputy Incident Commander is responsible for assisting the Incident Commander in the development and implementation of strategic and tactical objectives. The Deputy Incident

Commander is also responsible for supervising the implementation of the General Plan and Incident Action Plans, conducting planning meetings, and coordinating the activities of response personnel at the spill scene. He/She assumes the responsibility of the Incident Commander in his/her absence.

The Deputy Incident Commander is internally focused on response issues and the coordination of the General Staff and ensures that the Incident Commander is fully apprised of ongoing activities, allowing the Incident Commander to concentrate more on external Issues.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Assess the situation and/or obtain incident briefing from the Incident Commander.
- ☐ Coordinate the implementation of prioritized objectives and strategies established by the Incident Commander/Unified Command with the General Staff.
- ☐ Conduct Incident Briefing Meetings and Planning Meetings as required.
- ☐ Liaise with the Situation Unit Leader to ensure that the Information Center is continuously updated.
- ☐ Ensure that proper communications occur within the General Staff sections.
- ☐ Ensure that Section Chiefs' meeting attendance is coordinated for the smooth conduct of meetings.
- ☐ Ensure that the Incident Commander is kept appraised of any changes during the course of the response, which may affect the strategic and tactical objectives.
- ☐ Ensure that the Incident Action Plan for the next planning period is presented to the Incident Commander and Unified Command for approval on its completion.
- ☐ Ensure that the Span of Control of the General Staff is not exceeded should the incident escalate.
- ☐ Approve the use of trainees, volunteers and auxiliary personnel.

CRISIS MANAGER

The Crisis Manager (CM) is responsible for overseeing of the overall responsibility and for reporting back to Company Management. The Crisis Manager will ensure personnel have the correct property rights to acquire the resources needed for the response. The Crisis Manager will work closely with the IC to be able to maintain an up-to-date picture of the incident and progress made to be able to report back to Company Management. The Crisis Manager will assist the IC when necessary to ensure the practical flow of information both internally and externally.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander.
- ☐ Identify and maintain communications link with Company Management.
- ☐ Provide assistance to Incident Commander when needed.

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.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Attend briefings and planning meetings from Incident Commander.
- ☐ Establish a single center for Information Officer Operations. This may be called the Joint Information Center (JIC).
- ☐ Arrange for necessary workspace, materials, telephones, and staffing.
- ☐ Prepare Initial Information Summary as soon as possible after arrival.
- ☐ Observe constraints on the release of information imposed by Incident Command.
- ☐ Obtain approval for release of information from Incident Command.
- ☐ Prepare and disseminate news releases.
- ☐ Arrange for meetings between media and appropriate response personnel.
- ☐ Provide escort service and protective clothing to media personnel/VIPs.
- ☐ Respond to special requests for information.
- ☐ Obtain media information that may be useful to incident planning.
- ☐ Resolve conflicting information and bring media concerns to the attention of the Incident Commander.
- ☐ Communicate the needs and concerns of the public to the Incident Commander (IC).

LIAISON OFFICER

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

Responsibilities:

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

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LEGAL OFFICER

The Legal Officer is responsible for legal matters relative to the incident.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander.
- ☐ Conduct investigations per Incident Commander's request.
- ☐ Communicate to all affected emergency response personnel if work product is declared "Attorney-Client Privilege."
- ☐ Advise Incident Commander and other Command or General Staff on all matters that may involve legal issues.
- ☐ Ensure or provide direction and assistance to Finance Section on issues of procurement or claims.

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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).

Important: Safety Officer(s) may exercise emergency authority to stop and prevent unsafe acts.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Incident Commander (IC).
- ☐ Assist in enacting safety goals and objectives.
- ☐ Identify and evaluate safety and health hazards that may impact the responders and public health.
- ☐ Develop, implement, and disseminate SSP with the IC and the Section Chiefs.
- ☐ Designate exclusion zones.
- ☐ Determine or assure appropriate safety equipment is identified and is in use or available as needed for the specific response.
- ☐ Determine or manage the operation and maintenance of safety equipment needed to monitor and evaluate safety and health conditions and prevent unsafe condition for the specific response.
- ☐ Coordinate with Planning Section to ensure decontamination procedures are employed.
- ☐ Coordinate with Section Chiefs for on-scene medical services, as needed.
- ☐ Participate in incident general and IAP meetings.

SECURITY OFFICER

The Security Officer, a member of the Incident Command Staff, is responsible for the determination of the adequacy of physical security. The Security Officer is responsible for taking appropriate actions when improved physical security is required.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC).
- ☐ Participate in planning meetings.
- ☐ Review Incident Action Plans for security implications.
- ☐ Direct, coordinate, and assess effectiveness of security strategies.
- ☐ Modify security strategies as needed.
- ☐ Determine resource requirements.
- ☐ Interact with law enforcement personnel on matters relating to security.
- ☐ In a security incident, isolate the scene for preservation of assets/evidence.

OPERATIONS SECTION CHIEF

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC) or receive information from the overflight about spill issues.
- ☐ Dispatch site response team (remind each to consider the substance to be Hazardous) and remind each responder our order of priorities:
  - ☐ Safety
  - ☐ Environmental
  - ☐ Business
- ☐ Communicate with the Pipeline Control Center (PCC) to:
  - ☐ Determine what two stations the leak was reported to be between.
  - ☐ Learn what valves the PCCs have closed thus far.
  - ☐ Isolate the segment of pipeline where leak has occurred by closing mainline block valves.
- ☐ Ensure Safety to all workers and the public.
- ☐ Assess the Safety of the Environment by using monitors to detect levels of H2S or other hazardous substances.
- ☐ Contact the following city and county agencies:

- ☐ Sheriff's Department
- ☐ Emergency Manager
- ☐ Police

☐ Mitigate the Environmental impact (if necessary, by creating natural earth dikes or if oil has reached the any water, deploying booms to control the spill).

☐ Report location, movement and speed of spill to the IC.

☐ Work with the Environmental, Health, and Safety Manager to set up the On Site Spill Response Organization (OSRO).

☐ Organize the team that will report to the Operations Section Chief:

- ☐ Staging Group Leader
- ☐ Repair Group Leader
- ☐ Containment Group Leader

OPERATIONS SECTION CHIEF, CONTINUED

Responsibilities, Continued:

☐ Communicate with the helicopter to learn if any changes have occurred with the spill direction.

☐ Report information about special occurrences that may have developed since the initial report to the IC.

☐ Work with other responders arriving to the site such as the Incident Management Team and the vacuum truck service.

☐ Work with Planning Section Chief to implement the containment plan.

☐ Work with Logistics Section Chief to get resources to implement the containment plan.

☐ Make or approve expedient changes to the Incident Action Plans during the execution as necessary.

☐ Refer to the Response Plan Book for any missed items.

☐ Repair and Restore.

STAGING GROUP LEADER

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

Responsibilities:

☐ Maintain Activity Log.

☐ Obtain briefing from Operations Section Chief.

☐ Participate in Operations' planning meetings and briefings.

☐ Advise Operations Section Chief of equipment location and operational status.

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

REPAIR GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Operations Section Chief.
- ☐ Conduct frequent hazard assessments and coordinate safety needs in conjunction with Operations Section Chief and Safety Officer.
- ☐ Determine source and extent of damage.
- ☐ Obtain necessary materials, personnel, and equipment to repair damage.
- ☐ Plan and execute repairs; periodically advise Operations Section Chief on status of restoration activities.
- ☐ Participate in Operations' planning meetings and briefings.
- ☐ Conduct facility restoration activities in accordance with Company procedures, Site Safety Plan (SSP) and IAP.
- ☐ Participate in development of Repair Plan for the Operations' portion of Incident Action Plan (IAP).
- ☐ Verify that repairs are complete and sound using proven test methods (x-ray, hydrostatic test or other accepted methods) and in compliance with DOT requirements.
- ☐ Supervise completion of repair by the use of proper back-fill materials and techniques.
- ☐ Inform the Incident Commander when pipeline is ready for return to service.
- ☐ Determine and request additional materials, equipment, and personnel as needed.
- ☐ Ensure all equipment is decontaminated prior to being released.

CONTAINMENT GROUP LEADER

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

Responsibilities:

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

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, and develop response and cleanup strategies.

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the IC.
- ☐ Immediately notify Planning Team members, get ETA for each, and begin documenting actions and time.
  - ☐ Environmental Group Leader
    - ☐ EGL will contact
    - ☐ Documentation Unit Leader (_____)
    - ☐ Documentation Scribe (_____)
  - ☐ Engineering Specialist (_____)
  - ☐ Disposal Specialist
- ☐ Travel to IC control room, document arrival time.
  - ☐ Identify IC, Operations Section Chief, Logistics Section Chief
  - ☐ Receive initial briefing from IC

- ☐ Set up Planning Team staging table away from main IC communication area

☐ Review briefing with Planning Team, communicate roles, and review tools checklist.

- ☐ Assign Environmental Group Leader
- ☐ Identify Documentation Scribe
- ☐ Identify Disposal Specialist to Planning Team
- ☐ Communicate Planning Team members and roles to Documentation Scribe

☐ Review potential population/environmentally sensitive area impact if information is not already available from on-site & communicate to Engineering Specialist, Logistics Section Chief, and Documentation Scribe.

☐ Supervise preparation of the Incident Action Plan.

☐ Update Documentation Scribe as information is available on the Incident Action Plan & relay information from IC to Planning Team.

- ☐ Provide periodic predictions on incident potential
- ☐ Update Documentation Scribe with information on release estimate when available
- ☐ Review Planning Team member's checklists

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

Responsibilities:

☐ Maintain Activity Log.

☐ Obtain briefing from the Planning Section Chief.

☐ Participate in Planning Section meetings and briefings.

☐ Participate in development of Planning's portion of Incident Action Plan (IAP).

☐ Coordinate environmental activities with responding regulatory agencies.

☐ Periodically advise the Planning Section Chief on status of group activities.

☐ Request additional personnel/specialists to support response effort.

☐ Determine environmental group resource needs.

☐ Identify and develop a prioritized list of natural, cultural, and economic (NCE) resources at risk.

☐ Initiate and coordinate Natural Resources Damage Assessment (NRDA) activities.

☐ Develop a management plan for recovered contaminated media and ensure coordination with Containment Group Leader.

☐ Ensure proper management of injured/oiled wildlife.

- ☐ Determine alternative cleanup strategies for response.

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DISPOSAL SPECIALIST

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Travel to site.
- ☐ Upon arrival at incident staging area, report to Operations Section Chief and receive update.
- ☐ Take appropriate actions as situation may require ASAP. Provide Planning Section Chief or Environmental Group Leader with Disposal Plan and update on on-site conditions that might impact Incident Action Plan.

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SITUATION GROUP LEADER

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

Responsibilities:

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

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DOCUMENTATION SCRIBE

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Documents all information received from group chiefs and IC on main board and aids in dissemination of information.

Tools Checklists:

- ☐ Alignment maps
- ☐ County road maps
- ☐ Environmental maps
- ☐ Pipe volume calculation cheat sheet
- ☐ Spill Response Plan

LOGISTICS SECTION CHIEF

The Logistics Chief (LC) is responsible for providing vital services, facilities and materials necessary for the response effort. Coordinates transportation, communications, purchasing and support activities.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Incident Commander (IC).
- ☐ Immediately contact EH&S, Security/Medical Group Leader, Supply/Ground Support Group Leader, and Communications Group Leader - provide phone communication required and location to respond to, and receive their ETA.
- ☐ Initial calls prior to travel to vacuum truck company, mechanical contractor, and Company Inspector.
- ☐ Upon arrival to IC Control Room:
  - ☐ Identify IC, Operations Section Chief, and Planning Section Chief
  - ☐ Remember to stay within the Logistics role
  - ☐ Seek out and receive initial briefing from IC
  - ☐ Seek out Planning Section Chief
  - ☐ Set up Logistics location next to Planning lead in the room
- ☐ Tools checklist to be brought to IC Control Room:
  - ☐ Atlas with pipeline drawn in
  - ☐ Spill Response Plan
  - ☐ Pipeline station directions
  - ☐ Sticky note pads
- ☐ Communicate briefing to Logistics team, start organization plan, set staging area and communicate to Section Chiefs.
- ☐ Supply/Ground Support Group Leader and Communications Group Leader start calls for additional Company and outside personnel, along with equipment/material needs,

pass on to ETA to our scribe.

- ☐ Ensure EH&S and Security/Medical Group Leader is in vicinity of field site.
- ☐ Supply/Ground Support Group Leader start recording info for Logistics team, pass on to IC scribe.
- ☐ Inspector starts organization of repair equipment needed.
- ☐ Initiate communication toward response strategy/incident action plan with Planning Section Chief.
- ☐ Once drawing on board, Logistics scribe inputs sticky notes to locations where personnel, equipment, and materials will arrive with an ETA.
- ☐ Coordinate personnel and equipment as determined within the Planning Group.
- ☐ Direct updates to IC Scribe.
- ☐ Changing staging area? Immediate communication to IC, Operations and Planning leads.
- ☐ A couple hours into response, reference Spill Response Plan.

COMMUNICATIONS GROUP LEADER

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

Responsibilities:

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

MEDICAL GROUP LEADER

The 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.

Responsibilities:

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

SUPPLY/GROUND SUPPORT GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Logistics Section Chief.
- ☐ Respond to request for resources or resource information as needed.
- ☐ Periodically advise Logistics Section Chief on status of Supply/Ground Support Group.
- ☐ Participate in Logistics meetings and briefings.
- ☐ Participate in development of Logistics' portion of Incident Action Plan (IAP).
- ☐ Communicate with Staging Group Leader concerning material, equipment, and personnel that are inbound and the approximate time of arrival.
- ☐ Establish a check-in/check-out function as appropriate.
- ☐ Coordinate with other Section Chiefs to ascertain the priority of needed materials, equipment, and services.
- ☐ Advise Section Chiefs of changing situations or conditions in the staging areas.
- ☐ Coordinate with Finance Section Chief to establish accounts, purchase orders, AFEs, and procedures as necessary.
- ☐ Establish an inventory control system for materials and equipment.
- ☐ Maintain roads, when necessary; post signs or instructions for area identification or

traffic control.

- ☐ Demobilize and reposition staging areas as needed.

FINANCE SECTION CHIEF

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Incident Commander (IC).
- ☐ Participate in Incident Command planning meetings and briefings.
- ☐ Conduct planning meetings and briefings for Finance Section.
- ☐ Participate in preparation of the Incident Action Plan (IAP).
- ☐ Participate in planning meetings.
- ☐ Participate in Unified Command System (UCS) as incident warrants.
- ☐ Request assistance of corporate accounting, right-of-way, or risk management as needed.
- ☐ Assist with contracting administration.
- ☐ Establish a process or activate a Claims Group to accept claim submission as a result of incident.

ACCOUNTING GROUP LEADER

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

Responsibilities:

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

CLAIMS GROUP LEADER

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

Responsibilities:

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

FIGURE 4-2 - FACILITY EQUIPMENT*

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Response Equipt. Storage - Warehouse						
Absorbent	Pads	1 to 5 - Packages	Standard	Various	Ready	Response Equipt. Storage - Warehouse
Communication Equipment - Refer to Section 7.1.6						
Response Equipt. Storage - Warehouse						
Hand Tools	Rakes	1 to 5	Standard	Various	Ready	Response Equipt. Storage - Warehouse
Hand Tools	Shovels	1 to 5	Standard	Various	Ready	Response Equipt. Storage - Warehouse

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

FIGURE 4-3 - REGIONAL COMPANY AND RESPONSE CONTRACTOR'S EQUIPMENT LIST / RESPONSE TIME

*USCG Classified OSRO for facility

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
*TAS Environmental Services, LP (San Antonio) San Antonio, Texas	Full response capabilities	1 hours
*Eagle SWS, (San Antonio) Cibolo, TX	Full response capabilities	1 hours
*Miller Environmental Services, Inc. Corpus Christi, TX	Full response capabilities	5 hours

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

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

1. Date(s) performed:
2. Exercise Name:
Type of Equipment Deployment Exercise:
☐ Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill

EQUIPMENT DEPLOYMENT EXERCISE	
Equipment deployed is	☐ Company owned ☐ OSRO owned ☐ Both
Deployment of equipment was	☐ Exercise (☐ Announced ☐ Unannounced) ☐ Actual Spill
If facility - owned, was Equipment deployed sufficient for average most probable release?	☐ yes ☐ no ☐ na
If OSRO - owned, was Equipment deployed a representative sample (at least 1000 ft boom and at least on type of skimmer)?	☐ yes ☐ no ☐ na
Was equipment deployed in its intended operating environment?	☐ yes ☐ no ☐ na
Are facility personnel responsible for response operations involved in a comprehensive training program?	☐ yes ☐ no ☐ na
Is facility response equipment involved in a	

comprehensive maintenance program	☐ yes ☐ no ☐ na
Date of equipment deployment:	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies listed for equipment deployed (as listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	
OSRO Certification (if applicable)	

FIGURE 4-4 - EPA REQUIRED RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG, CONTINUED

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy	

equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

ACTIVITY	INFORMATION
Item Type (e.g. boom or skimmer):	
Amount of equipment deployed:	
Number of support personnel to deploy equipment:	
Describe goal of equipment deployed	
Describe strategies for equipment deployed (Listed in ACP or responders plan)	
Was all deployed equipment operational? (If no, explain)	

2. Lessons learned description and persons responsible for follow-up:

Description of Lessons Learned	Responsible corrective measures	Time Table for corrective measures
Print Name:		
Signature:		
Position:		

5.0 INCIDENT PLANNING

5.1 ICS FORMS

ICS Forms are available electronically via this Plan's Forms Navigator.

Note: These forms are alternate or suggested forms to be used as appropriate.

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

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

- INCIDENT ACTION PLAN

For use by the Planning Section to plan each day's response actions. This plan consists of the portions identified on the IAP cover page and needs to be approved by the Incident Commander, Federal On-Scene Coordinator (FOSC), and State On-Scene Coordinator (SOSC).

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

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

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

- INCIDENT OBJECTIVES - ICS 202

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

- **ORGANIZATION ASSIGNMENT LIST - ICS 203**

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

5.1.1 Incident Briefing ICS 201-OS

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

INCIDENT BRIEFING	March, 2000	ICS 201-OS (pg 1 of 4)

5.1.1 Incident Briefing ICS 201-OS, Continued

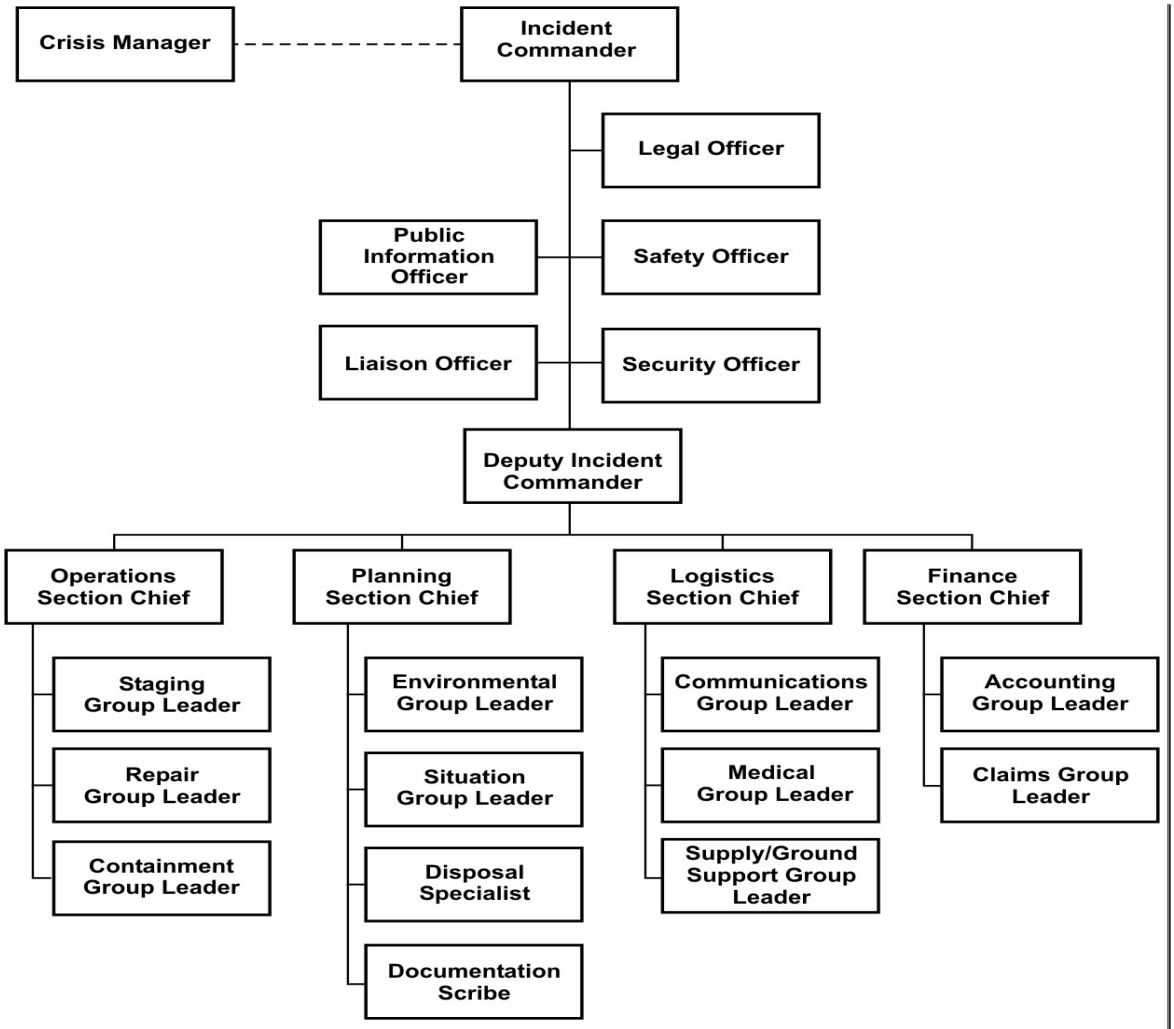
1. Incident Name	2. Prepared By: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS
4. Initial Incident Objectives		
5. Summary of Current Actions		

Time	Action/Note

INCIDENT BRIEFING March, 2000 ICS 201-OS (pg 2 of 4)

5.1.1 Incident Briefing ICS 201-OS, Continued

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



INCIDENT BRIEFING	March, 2000	ICS 201-OS (pg 3 of 4)

5.1.1 Incident Briefing ICS 201-OS, Continued

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

7. Resources Summary

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

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

5.1.2 Incident Action Plan (IAP) Cover Sheet

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

SOSC
IC

INCIDENT ACTION PLAN

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

- ☐ ICS 202-OS (Incident Objectives)
- ☐ ICS 203-OS (Organization Assignment List)
- ☐ ICS 204-OS (Assignment List)
- ☐ ICS 205-OS (Communications Plan)
- ☐ ICS 206-OS (Medical Plan)
- ☐ ICS 209-OS (Incident Status Summary)
- ☐ ICS 214-OS (Unit Log)
- ☐ ICS 214a-OS (Individual Log)
- ☐
- ☐

4. Prepared By: (Planning Section Chief)	**Date/Time:**
IAP COVER SHEET	March, 2000

5.1.3 Incident Objectives ICS 202-OS

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

5. Safety Message for Specified Operational Period Approved Site Safety Plan Located at:
6. Weather: See Attached Weather Sheet
7. Tides/Currents: See Attached Tide/Current Data
8. Time of Sunrise: **Time of Sunset:**
9. Attachments (check if attached) ☐ Organization List (ICS 203-OS) ☐ Assignment List (ICS 204-OS) ☐ Communications Plan (ICS 205-OS) ☐ Medical Plan (ICS 206-OS) ☐ Weather
10. Prepared By: (Planning Section Chief) **Date/Time:**
INCIDENT OBJECTIVES March, 2000 ICS 202-OS

5.1.4 Organization Assignment List ICS 203-OS

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

3. Incident Commander and Staff

	Primary	Deputy
Federal:		
State:		
IC:		

Safety Officer :

Information Officer:

Liaison Officer:

4. Agency Representatives

Agency	Name

7. Operations 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

5. Planning Section

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

6. Logistics Section

Chief	
Deputy	
Time Unit	
Procurement Unit	
Compensation Unit	
Cost Unit	

a. Support Branch

Director	
Supply Unit	
Facilities Unit	
Transportation Unit	
Vessel Support Unit	
Ground Support Unit	

b. Service Branch

Director	
Communications Unit	
Medical Unit	
Food Unit	

Branch Director		
Deputy		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
Division / Group		

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 Section

Chief	
Deputy	
Time Unit	
Procurement Unit	
Compensation Unit	
Cost Unit	

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

5.2 SITE SAFETY AND HEALTH PLAN

5.2.1 Safety Introduction and Overview

Responding to spills and other emergencies involving products can be very hazardous if not safely managed. Two critical areas deserving special attention are **Prevention of Accidental Ignition** and **Personnel Safety**. The following safety considerations shall be followed:

Prevention of Accidental Ignition

- Work upwind of the spilled liquid as much as possible.
- Monitor LEL with appropriate air monitoring device and frequency.
- Complete air monitor logs for proper documentation as monitoring continues.
- Utilize EH&S Work Permit during the Incident (including appropriate logs and attachments, etc.)
- Use non-sparking tools in areas where vapors are present.
- Isolate the public and press from the immediate area. They are not trained in the necessary safety precautions to function in this environment. The press utilizes equipment that is not approved for explosive atmospheres.

Personnel Safety

- Utilize the appropriate air monitoring equipment to protect yourselves from the vapors or fumes of petroleum products and crude oils. High concentrations of these vapors may be toxic and can be an asphyxiate.
- Work using the "buddy system" (that is, two people working as a team).
- Use respiration equipment (APRs or SCABA) and other applicable PPE when necessary.

The Site Safety Plan provides a comprehensive framework for initiating and maintaining quality safety practices at the scene of an emergency. The Safety Manager is responsible for promoting a safe and healthy environment for personnel involved in incident response. The following Site Safety Plan is designed to provide a consistent, comprehensive process to meet this objective.

For small, minor spills, the Safety Plan may consist of a EH&S Work Permit and the Safety Plan Checklist or equivalent company Work Permit.

5.2.2 Initial Site Safety and Health Plan

SAFETY PLAN CHECKLIST

ASSIGN SITE SAFETY RESPONSIBILITY
Name:
ESTABLISH PERIMETER AND RESTRICT ACCESS (Compile sketch as necessary)
CHARACTERIZE SITE HAZARDS
• Identify pollutant:
• Obtain Material Safety Data Sheets
• Conduct air monitoring as necessary:
• Identify physical and biological hazards, i.e.: slips, trips, falls, confined spaces, noise, weather conditions, poisonous insects, reptiles, plants, and biological waste:
ESTABLISH CONTROL ZONES
• Exclusion zone:
• Contamination reduction zone:

Support zone:
ASSESS TRAINING REQUIREMENTS
• Ensure only authorized persons are allowed access
UTILIZE EH&S SAFE WORK PERMITS AS INITIAL SITE SAFETY PLAN
• Ensure safety briefings
• Select Personal Protective Equipment
• Level A, B, C, or D:
ESTABLISH DECONTAMINATION STATION(S)
ESTABLISH EMERGENCY MEDICAL PLAN
• Locate hospital, EMT, and first aid stations:
• List emergency numbers:
Fire:
Police:
Ambulance:
For other spills of significance, the Site Safety Plan is designed to meet the Safety Objectives.

5.2.3 Site Safety and Health Plan

Incident Name:	
Date:	Site Safety Officer:
Scope	
This Site Safety Plan is for use on the specified above incident and response to a spill of _____ estimated to be approximately _____ in volume. This incident is being managed by designated Company personnel integrated with on-site Federal, State, and/or Local response representatives along with the use of commercial HAZWOPER-accepted qualified contractors. This plan is based on the regulations and recommendations of Federal Agencies such as OSHA, EPA, DOT, and USCG and the Company. Company personnel or contractors will be on site to address safety concerns, site safety plans, conduct Industrial Hygiene monitoring, and for special assistance; however, the day-to-day safe operation of the site and project is the responsibility of trained site supervisors. Every site employee shall comply with provisions of this plan and focus constant attention on preventing loss or damage to any person, property, process, or the environment.	
Site Description	
Location:	

This incident is at _____, in the state of _____, and in the vicinity of _____.

The Command Post is currently located at _____.

The Incident Base and Staging Area are located at _____.

5.2.3 Site Safety and Health Plan, Continued

On-Site Control Boundaries:	**Marking:**
Exclusion Zone - Hotline	As designated by:
Contamination Reduction Zone	As designated by:
Support Zone	As designated by:
Hazards:	
Area Affected:	
The area is _____and is identified as the Hot Zone.	
Surrounding Population:	
Topography:	
Weather Conditions:	
The weather is _____, temp. is _____, and there is a _____ % chance of precipitation. The prevailing wind is from the _____ at _____ mph throughout the day.	
Environmental and Archeological Concerns:	
Initial Entry Objectives:	

5.2.3 Site Safety and Health Plan, Continued

Additional Information:
Identified sources of ignition within or adjacent to the spill or contained liquid will be shut down, secured, isolated or monitored, as appropriate. Electrical equipment shall be in compliance with regulatory requirements. Note: Smoking is not allowed on Company property.
Site Access
Personnel shall notify the Site Safety Officer or designee prior to entering or leaving the site. _____ has been designated to control access. A sign-in log will be maintained at the incident base. Persons entering the area shall sign in/out. Entry into spill area will be by trained personnel only. Training documentation shall be provided to the Site Safety Officer prior to entry.
Hazard Evaluation
Chemical Hazards:
The following substance is known to be at the Spill site.

Substance:	**Primary Hazard:**
☐ Crude Oil	Flammable/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Gasoline	Flammable/Slightly Toxic/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Diesel Fuel	Flammable/Slightly Toxic/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Jet Fuel	Flammable/Moderately Toxic/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Additive	Flammable/Slightly-Moderately Toxic/Skin, Eye, Nose, Throat, and Lung Irritant
☐ Butane	Flammable/Asphyxiant/Prolonged contact may cause frostbite
☐ Kerosene	Flammable/Skin, Eye, Nose, Throat, & Lung Irritant
☐ Propane	Flammable/Asphyxiant/Prolonged contact may cause frostbite/Explosive mixtures with air
☐ Benzene	Flammable/Skin and Eye Irritant/May be toxic if inhaled or ingested
☐ Hydrogen	Flammable gas/Asphyxiant/Colorless and odorless
☐ Toluene	Flammable/Skin and Eye Irritant/may be toxic if inhaled or ingested
☐ Xylene	Flammable/Skin and Eye Irritant/may be toxic if inhaled or ingested
☐ Natural Gas	Flammable gas/Asphyxiant/Colorless and odorless
☐ Fuel Gas	Flammable/Poisonous Gas/Skin and Eye Irritant/Prolonged contact may cause frostbite/Harmful or fatal is swallowed

5.2.3 Site Safety and Health Plan, Continued

Material Safety Data Sheets

Material Safety Data Sheets for Company Products are located on the company intranet. Employees involved in an emergency response are trained to read Company MSDS and to know where they are located. MSDS for material released/spilled during this incident can be found at the following locations:

Personal Protective Equipment

The following Personal Protective Equipment (PPE) shall be required for entry into the Spill Area during the cleanup process.

Level B	Level C	Level D
1. Hard Hat 2. Self Contained Breathing Apparatus 3. Latex inner gloves, Neoprene outer gloves 4. Flame retardant clothing, such as Nomex suits, with cuffs and pant legs duct tape sealed 5. Radios will be provided to the entry team, backup team, and command staff. These radios shall be intrinsically safe and tested prior to entry	1. Hard Hat 2. Safety glasses with side shields, splash goggles, or safety glasses with full face shield 3. Neoprene gloves 4. Tyvek disposable suit with cuffs and pant legs duct tape sealed 5. If monitoring results indicate the continued need for respiratory protection, SCABAs or SARs may be used. If a half mask or a full face respirator is allowed, it must be NIOSH-approved and use the correct type of cartridge	1. Hard Hat 2. Safety Glasses 3. Long sleeved shirt - tank tops will not be allowed 4. Long legged pants or overalls - shorts will not be allowed 5. Hand protection as needed 6. Additional items as required by Safety Officer

5.2.3 Site Safety and Health Plan, Continued

Decontamination

A Decon Site Layout (**SECTION 5.5** of the Spill Response Plan) shall be used to construct the Decon area. Personnel involved in the response and entering the Hot Zone area shall be trained and equipped to meet the requirements of Emergency Response.

Decon Site(s) should be constructed at the point of entry to the Hot Zone. Multiple Decon Sites may be necessary for multiple cleanup areas or when an area has multiple entry points.

Communications

Only intrinsically safe electronic devices will be allowed within the Hot Zone. Verbal and hand signal communication is allowed in the Hot Zone.

Cellular phones, pagers, lamps, or flare devices shall not be allowed into Hot Zone unless intrinsically safe and approved by the Safety Office or designee. Other non-sparking methods which cannot produce ignition may be allowed in the Hot Zone, but must be approved by the Safety Officer.

Cellular phones, pagers, stationary telephones, and any other communication devices shall be

allowed by the Safety Officer into other support areas of the incident.
Personal Identification
As available, Incident Command position personnel shall wear vests with the position label on the vest (Incident Commander, Planning, Logistics, Operations, Safety, etc.) If vests are not available, the IC personnel shall ensure they are recognized by personnel they are supervising.
First Aid
First aid kits are located at _____. Serious injuries will be treated by 911 EMS response systems as needed. Injuries, no matter how slight, shall be reported to a Safety Officer immediately.

5.2.3 Site Safety and Health Plan, Continued

Emergency Eye Wash Station:
Portable emergency eyewash stations are located at _____.
Potable Water:
Potable water is available at _____.
Toilet Facilities:
Toilet facilities are available at _____.
Air Monitoring:
Air monitoring shall be conducted by _____, who will utilize _____ to monitor the levels of _____. Other sampling devices or media must be approved by the Safety Officer prior to being allowed into the area. A log sheet shall be maintained for gas monitoring data to be logged on _____ minute interval. Readings shall be collected from the perimeter of the cleanup area on a _____ interval. Air monitoring shall continue until the Safety Officer determines that it is no longer necessary.

5.2.3 Site Safety and Health Plan, Continued

Other Equipment Failure:
If other equipment fails to operate properly, the Operations Chief shall be notified and then determine the effect of this failure on continuing the operations. If the failure affects the safety of personnel or prevents completion of the planned tasks, personnel shall leave the area until the situation is corrected.

Plan Prepared By:		
Safety Officer:		
Printed Name	Signature	Date
Plan Reviewed By:		
Operations Chief:		
Printed Name	Signature	Date
Plan Approved By:		
Incident Commander:		
Printed Name	Signature	Date

Additional Health/Hygiene Sampling

Additional testing of atmosphere, personnel, or equipment may be conducted at the discretion of the Safety Officer or Incident Commander.

Emergency Procedures

The following standard emergency procedures will be used by the on-site personnel. The Incident Commander, Operations Chief, and Safety Supervisor shall be made aware of any on-site emergencies and be responsible for ensuring that the appropriate procedures are followed:

Injury/Illness in the area:

An injury or illness occurring in the response area shall be immediately communicated through the Command Staff to the Safety Officer in order that it may be responded to in the degree necessary. This includes everything from minor first aid treatment to the more serious injuries involving the 911 EMS system.

A medical emergency shall receive immediate attention and appropriate response. Company notification by the on-site personnel shall be in the following order until contact is made with one of the following: the Site Safety Officer, Operations Section Chief, Incident Commander, or Operations Manager.

911 EMS Response Service:

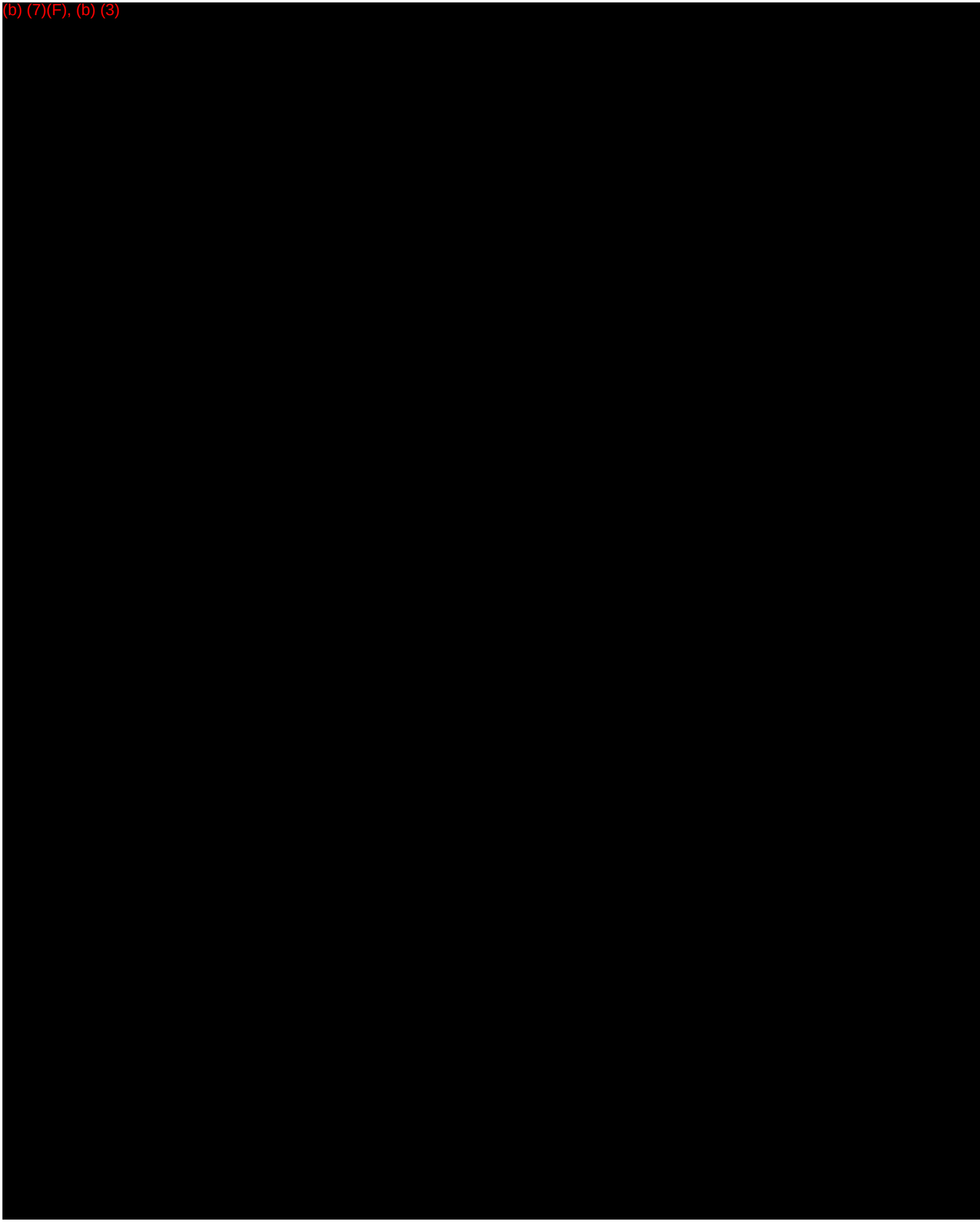
Refer to **SECTION 3** for the appropriate notifications.

Personal Protective Equipment Failure:

If worker experiences a failure or alteration of protective equipment that affects the protection factor, that person shall immediately evacuate to a safe area. Decon procedures shall be followed. The Safety Officer shall be notified immediately. Return to the area shall not be permitted until the equipment has been properly and effectively repaired or replaced.

5.3 INCIDENT SECURITY PLAN

(b) (7)(F), (b) (3)


(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

[redacted]

5.4 COMMAND POST

In the event of a major spill or other emergency, both an off-site Emergency Operations Center (EOC) and a Command Post may be established. For a minor emergency, only a Command Post may be established. Refer to **FIGURE 5-1** for guidelines in establishing a Command Post.

FIGURE 5-1 - COMMAND POST CHECKLIST

COMMAND POST CHECKLIST	
Positioned outside of the present and potential Hazard Zone.	☐
Positioned away from the general activities such as traffic, noise, and confusion associated with an incident.	☐
Have ability to provide security and to control access to the ICP as necessary.	☐
Adequate space for size of staff.	☐
24-hour accessibility.	☐
Personal hygiene facilities.	☐
Suitability of existing communications resources (phone/fax/radio).	☐
Suitability of private conference and briefing rooms.	☐

Location or building has capability to grow, as necessary.	☐
Notify other parties of Command Post location; provide maps/driving directions.	☐
Determine staging areas and incident base locations.	☐
Identify future need to move or upgrade facilities.	☐

Command Posts for this facility are located at "list location":a safe place (which may change per incident) per Incident Commander.

5.5 PUBLIC AFFAIRS

Company Spokesperson

The Incident Commander shall designate a company spokesperson at the scene and identify the spokesperson to Management and Public Affairs. Such person shall retain spokesperson's duties until relieved of those duties by the Incident Commander. The designated company spokesperson's duties shall include:

- Interaction with the company's Public Affairs Group about the incident and the progress of the Company's response;
- Interaction with the Incident Commander regarding requests for information from media and/or public;
- Interaction with media and/or public, including those who may be directly affected (through evacuation or otherwise) by the incident and/or the Company's response to the incident;
- Dissemination of truthful, complete, and appropriate information in response to requests and/or needs of media and/or public.

Unless designated by the Incident Commander, the Company spokesperson shall not be the principal contact between the company and responding or other appropriate governmental agencies.

The designated Company spokesperson shall have been trained on this section of the Integrated Contingency Plan and shall have received other training regarding the responsibilities of a Company spokesperson prior to his/her appointment as Company spokesperson. Any person who has not received such training shall not be qualified to serve as Company spokesperson.

The designated spokesperson shall notify appropriate personnel from the responding company, contractual responder, and necessary governmental agencies that he/she has been designated by the Incident Commander as the on-scene Company spokesperson and that as the designated spokesperson, he/she is the one and only spokesperson for the Company until advised otherwise. The spokesperson shall also advise responding company and contractual personnel that only the designated on-scene spokesperson should speak with the media and/or public.

Message Verification

Prior to providing any information regarding an incident to the media and/or public in any form, the Company spokesperson must clear the message both factually and contextually with the Incident Commander. If practical and feasible, the Company spokesperson should also

consult with the Legal Department and Public Affairs prior to providing any information to the media and/or public.

If consultation with Public Affairs is not feasible prior to the required release of information, then the Incident Commander and spokesperson shall use the approved media statement example listed below. **This statement is only to be used if a briefing with Legal and Public Affairs is not available.**

Media Statement

This statement is to be used only in the following situations:

- **By the on-scene Company spokesperson designated by the Incident Commander**
- **When Legal Department and Public Affairs consultation is unavailable**

We had an event (*describe incident type/location*). At this time we're working to manage the (*release, fire, etc., OR it is under control*). While we are still checking in with all our employees and others in the area, we believe (*acknowledge whether there are injuries or not*). We have notified local officials, including (*identify responding agencies*) and they are (*offering help or assisting*) as needed. Along with these agencies, we are monitoring the situation closely and will advise of any needed actions (*or, describe advised actions, if any*). As I'm sure you can understand, I must now return to my duties here. We'll have updates as information becomes available through (*identify response spokesperson if known, internal or outside*). Thank you for your patience.

Interviews

The Company spokesperson should refrain from granting on-camera interviews, where practical. If the spokesperson must provide an on-camera interview without a representative of Public Affairs present, then the spokesperson should consult with the Company's Public Affairs Group in preparation for the interview.

6.0 PLOT PLANS / TANK TABLE

FIGURE 6-1 - DRAINAGE DIAGRAM

(Click here for Drainage Diagram)

FIGURE 6-2 - EVACUATION DIAGRAM

(Click here for Evacuation Diagram)

FIGURE 6-3 - TANK TABLE

			Secondary					

Container/ Source	Major Type of Failure	Total Capacity (gal)	Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
ABOVEGROUND CONTAINERS - (b) (7)(F), (b) (3)								
110	Leak/ Rupture	(b) (7)(F), (b) (3)		Internal Floating Roof	1989	(b) (7)(F), (b) (3)	Instantaneous within Containment	Transmix/ Diesel/ Gasoline
120	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Transmix/ Diesel/ Gasoline/Ethanol
130	Leak/ Rupture			Fixed Roof	1989		Instantaneous within Containment	Diesel
140	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
150	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
160	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
170	Leak/ Rupture			Fixed Roof	1989		Instantaneous within Containment	Gasoline-Diesel-Ethanol Swing
180	Leak/ Rupture			Internal Floating Roof	1989		Instantaneous within Containment	Gasoline-Diesel Swing
MISCELLANEOUS - (b) (7)(F), (b) (3)								
Loading Rack Bays 1-4	Leak/ Rupture	(b) (7)(F), (b) (3)		-	1989	(b) (7)(F), (b) (3)	Instantaneous within Containment	Transmix/ Diesel/ Gasoline/Ethanol
Ethanol unloading truck	Leak/ Rupture			-	2009		Instantaneous within Containment	Ethanol
Additive Unloading	Leak/ Rupture			-			within containment	Additive
UNDERGROUND CONTAINERS - (b) (7)(F), (b) (3)								
#1	Leak/ Rupture	(b) (7)(F), (b) (3)		Fiberglass Double Wall	1996	(b) (7)(F), (b) (3)	Soil/Groundwater	Additive
#2	Leak/ Rupture			Fiberglass Double Wall	1996		Soil/Groundwater	Additive
#3	Leak/ Rupture			Fiberglass Double Wall	1996		Soil/Groundwater	Additive

		(b) (7)(F), (b) (3)			(b) (7)(F), (b) (3)		
#4	Leak/ Rupture		Fiberglass Double Wall	1996		Soil/Groundwater	Additive
#5	Leak/ Rupture		Fiberglass Double Wall	1996		Soil/Groundwater	Additive

Containment Type: 1=Earthern Berm and Floor, 2=Concrete Berm and Floor, 3=Earthern Berm and Concrete Floor, 4=Metal Berm and Floor, 5=Portable Containment or Inside Building, 6=Double Walled, 7=Coated Asphalt Materials, * Not in Containment Area, ** Curbing and containment system

Tank / Roof Type: C=Cylinder, CR=Cone Roof, DW=Double Wall, EFR=External Floating Roof, FG=Fiberglass, GD=Geodesic Dome, H=Horizontal, HSM=Horizontal Skid Mounted, IF=Internal Floater, OOS=Out of Service, OT=Open Top, R=Riveted, S=Steel, SM=Skid Mounted, V=Vertical, W=Welded

FIGURE 6-3 - TANK TABLE , CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
UNDERGROUND CONTAINERS - Total: (b) (7)(F), (b)								
#6	Leak/ Rupture	(b) (7)(F), (b) (3)		Fiberglass Double Wall	1996	(b) (7)(F), (b) (3)	Soil/Groundwater	Out of Service Blanked Off
Facility Total:								

Containment Type: 1=Earthern Berm and Floor, 2=Concrete Berm and Floor, 3=Earthern Berm and Concrete Floor, 4=Metal Berm and Floor, 5=Portable Containment or Inside Building, 6=Double Walled, 7=Coated Asphalt Materials, * Not in Containment Area, ** Curbing and containment system

Tank / Roof Type: C=Cylinder, CR=Cone Roof, DW=Double Wall, EFR=External Floating Roof, FG=Fiberglass, GD=Geodesic Dome, H=Horizontal, HSM=Horizontal Skid Mounted, IF=Internal Floater, OOS=Out of Service, OT=Open Top, R=Riveted, S=Steel, SM=Skid Mounted, V=Vertical, W=Welded

7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Bass, Guadalupe	*Micropterus treculii*	endemic to perennial streams of the Edward's Plateau region; introduced in Nueces River system		Texas	Bexar County
		colonial and cave-dwelling; also roosts in			

Bat, Cave Myotis	*Myotis velifer*	rock crevices, old buildings, carports, under bridges, and even in abandoned Cliff Swallow (Hirundo pyrrhonota) nests; roosts in clusters of up to thousands of individuals; hibernates in limestone caves of Edwards Plateau and gypsum cave of Panhandle during winter; opportunistic insectivore		Texas	Bexar County
Bat, Ghost-faced	*Mormoops megalophylla*	colonially roosts in caves, crevices, abandoned mines, and buildings; insectivorous; breeds late winter-early spring; single offspring born per year		Texas	Bexar County
Bear, Black	*Ursus americanus*	bottomland hardwoods and large tracts of inaccessible forested areas; due to field characteristics similar to Louisiana Black Bear (LT, T), treat all east Texas black bears as federal and state listed Threatened	T/SA;NL (Federal), T (State)	Texas	Bexar County
Beetle, A ground	*Rhadine exilis*	small, essentially eyeless ground beetle; karst features in north and northwest Bexar County	LE	Texas	Bexar County

T - Threatened
E - Endangered

7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Beetle, Helotes mold	*Batrisodes venyivi*	small, eyeless mold beetle; karst features in northwestern Bexar County and northeastern Medina County	LE	Texas	Bexar County
Blindcat, Toothless	*Trogloglanis pattersoni*	troglobitic, blind catfish endemic to the San Antonio Pool of the	T (State)	Texas	Bexar County

		Edward's Aquifer			
Blindcat, Widemouth	*Satan eurystomus*	troglobitic, blind catfish endemic to the San Antonio Pool of the Edward's Aquifer	T (State)	Texas	Bexar County
Cavesnail, Mimic	*Phreatodrobia imitata*	subaquatic; only known from two wells penetrating the Edwards Aquifer		Texas	Bexar County
Crane, Whooping	*Grus americana*	potential migrant via plains throughout most of state to coast; winters in coastal marshes of Aransas, Calhoun, and Refugio counties	LE (Federal) E (State)	Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Creeper (Squawfoot)	*Strophitus undulatus*	small to large streams, prefers gravel or gravel and mud in flowing water; Colorado, Guadalupe, San Antonio, Neches (historic), and Trinity (historic) River basins		Texas	Bexar County
Crustaean, A cave obligate	*Monodella texana*	subaquatic, subterranean obligate; underground freshwater aquifers		Texas	Bexar County
Dragon-head, Correll's false	*Physostegia correllii*	wet, silty clay loams on streamsides, in creek beds, irrigation channels and roadside drainage ditches; or seepy, mucky, sometimes gravelly soils along riverbanks or small islands in the Rio Grande; or underlain by Austin Chalk limestone along gently flowing spring-fed creek in central Texas; flowering May-September		Texas	Bexar County

Falcon, American Peregrine	*Falco peregrinus anatum*	year-round resident and local breeder in west Texas, nests in tall cliff eyries; also, migrant across state from more northern breeding areas in US and Canada, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.	DL (Federal) T (State)	Texas	Bexar County
Falcon, Arctic Peregrine	*Falco peregrinus tundrius*	migrant throughout state from subspecies' far northern breeding range, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.	DL	Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
		both subspecies migrate across the state from more northern breeding areas in US and Canada to winter along coast and farther south; subspecies (F. p. anatum) is also a			

Falcon, Peregrine	*Falco peregrinus*	resident breeder in west Texas; the two subspecies' listing statuses differ, F.p. tundrius is no longer listed in Texas; but because the subspecies are not easily distinguishable at a distance, reference is generally made only to the species level; see subspecies for habitat.	DL (Federal) T (State)	Texas	Bexar County
Fatmucket, Texas	*Lampsilis bracteata*	streams and rivers on sand, mud, and gravel substrates; intolerant of impoundment; broken bedrock and course gravel or sand in moderately flowing water; Colorado and Guadalupe River basins	T (State)	Texas	Bexar County
Giant-skipper, Manfreda	*Stallingsia maculosus*	most skippers are small and stout-bodied; name derives from fast, erratic flight; at rest most skippers hold front and hind wings at different angles; skipper larvae are smooth, with the head and neck constricted; skipper larvae usually feed inside a leaf shelter and pupate in a cocoon made of leaves fastened together with silk		Texas	Bexar County
Harvestman, Cokendolpher Cave	*Texella cokendolpheri*	small, eyeless harvestman; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Hawk, Zone-tailed	*Buteo albonotatus*	arid open country, including open deciduous or pine-oak woodland, mesa or mountain county, often near watercourses, and wooded canyons and tree-lined rivers along middle-slopes of desert mountains; nests in various habitats and sites, ranging from small trees in lower	T (State)	Texas	Bexar County

		desert, giant cottonwoods in riparian areas, to mature conifers in high mountain regions			

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Ibis, White-faced	*Plegadis chihi*	prefers freshwater marshes, sloughs, and irrigated rice fields, but will attend brackish and saltwater habitats; nests in marshes, in low trees, on the ground in bulrushes or reeds, or on floating mats	T (State)	Texas	Bexar County
Jointweed, Parks'	*Polygonella parksii*	Texas endemic; mostly found on deep, loose, whitish sand blowouts (unstable, deep, xeric, sandhill barrens) in Post Oak Savanna landscapes over the Carrizo and Sparta formations; also occurs in early successional grasslands, along right-of-ways, and on mechanically disturbed areas; flowering June-late October or September-November		Texas	Bexar County
Lizard, Spot-tailed Earless	*Holbrookia lacerata*	central and southern Texas and adjacent Mexico; moderately open prairie-brushland; fairly flat areas free of vegetation or other obstructions, including disturbed areas; eats small invertebrates; eggs laid underground		Texas	Bexar County
		open, arid and semi-arid			

Lizard, Texas Horned	*Phrynosoma cornutum*	regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September	T (State)	Texas	Bexar County
Meshweaver, Braken Bat Cave	*Cicurina venii*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Meshweaver, Madla's Cave	*Cicurina madla*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Meshweaver, Robber Baron Cave	*Cicurina baronia*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Metalmark, Rawson's	*Calephelis rawsoni*	moist areas in shaded limestone outcrops in central Texas, desert scrub or oak woodland in foothills, or along rivers elsehwere; larval hosts are Eupatorium havanense, E. greggii.		Texas	Bexar County
Mussel, False Spike	*Quadrula mitchelli*	possibly extirpated in Texas; probably medium to large rivers; substrates varying from mud through mixtures of sand, gravel and cobble; one study indicated water	T (State)	Texas	Bexar County

		lilies were present at the site; Rio Grande, Brazos, Colorado, and Guadalupe (historic) river basins			
Onion, Elmendorf's	*Allium elmendorfii*	Texas endemic; grassland openings in oak woodlands on deep, loose, well-drained sands; in Coastal Bend, on Pleistocene barrier island ridges and Holocene Sand Sheet that support live oak woodlands; to the north it occurs in post oak-black hickory-live oak woodlands over Queen City and similar Eocene formations; one anomalous specimen found on Llano Uplift in wet pockets of granitic loam; flowering March-April, May		Texas	Bexar County

T - Threatened
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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Orb, Golden	*Quadrula aurea*	sand and gravel in some locations and mud at others; found in lentic and lotic; Guadalupe, San Antonio, Lower San Marcos, and Nueces River basins	T (State)	Texas	Bexar County
Owl, Western Burrowing	*Athene cunicularia hypugaea*	open grasslands, especially prairie, plains, and savanna, sometimes in open areas such as vacant lots near human habitation or airports; nests and roosts in abandoned burrows		Texas	Bexar County
Pimpleback,	*Quadrula*	mud, gravel and sand substrates, generally in			Bexar

Texas	*petrina*	areas with slow flow rates; Colorado and Guadalupe river basins	T (State)	Texas	County
Pipit, Sprague's	*Anthus spragueii*	only in Texas during migration and winter, mid September to early April; short to medium distance, diurnal migrant; strongly tied to native upland prairie, can be locally common in coastal grasslands, uncommon to rare further west; sensitive to patch size and avoids edges.	C	Texas	Bexar County
Plover, Mountain	*Charadrius montanus*	breeding: nests on high plains or shortgrass prairie, on ground in shallow depression; nonbreeding: shortgrass plains and bare, dirt (plowed) fields; primarily insectivorous	PT	Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Rattlesnake, Timber/Canebrake	*Crotalus horridus*	swamps, floodplains, upland pine and deciduous woodlands, riparian zones, abandoned farmland; limestone bluffs, sandy soil or black clay; prefers dense ground cover, i.e. grapevines or palmetto	T (State)	Texas	Bexar County
		Texas endemic; moist to seasonally wet,			

Sage, Bid red	*Salvia pentstemonoides*	steep limestone outcrops on seeps within canyons or along creek banks; occasionally on clayey to silty soils of creek banks and terraces, in partial shade to full sun; basal leaves conspicuous for much of the year; flowering June-October		Texas	Bexar County
Salamander, Cascade Caverns	*Eurycea latitans complex*	endemic; subaquatic; springs and caves in Medina River, Guadalupe River, and Cibolo Creek watersheds within Edwards Aquifer area	T (State)	Texas	Bexar County
Salamander, Comal blind	*Eurycea tridentifera*	endemic; semi-troglobitic; found in springs and waters of caves	T (State)	Texas	Bexar County
Salamander, Texas	*Eurycea neotenes*	endemic; troglobitic; springs, seeps, cave streams, and creek headwaters; often hides under rocks and leaves in water; restricted to Helotes and Leon Creek drainages		Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Skunk, Plains spotted	*Spilogale putorius interrupta*	catholic; open fields, prairies, croplands, fence rows, farmyards, forest edges, and woodlands; prefers wooded, brushy areas and tallgrass prairie		Texas	Bexar County
Snake, Texas garter	*Thamnophis sirtalis annectens*	wet or moist microhabitats are conducive to the species occurrence, but is not necessarily restricted to them; hibernates underground or in or under surface cover; breeds March-August		Texas	Bexar County
Snake, Texas Indigo	*Drymarchon melanurus erebennus*	Texas south of the Guadalupe River and Balcones Escarpment; thornbush-chaparral woodlands of south Texas, in particular dense riparian corridors; can do well in suburban and irrigated croplands if not molested or indirectly poisoned; requires moist microhabitats, such as rodent burrows, for shelter	T (State)	Texas	Bexar County
Spider, Government Canyon Bat Cave	*Neoleptoneta microps*	small, eyeless, or essentially eyeless spider; karst features in north and northwest Bexar County	LE	Texas	Bexar County
Stork, Wood	*Mycteria americana*	forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since	T (State)	Texas	Bexar County

		1960			

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Tern, Interior Least	*Sterna antillarum athalassos*	subspecies is listed only when inland (more than 50 miles from a coastline); nests along sand and gravel bars within braided streams, rivers; also know to nest on man-made structures (inland beaches, wastewater treatment plants, gravel mines, etc); eats small fish and crustaceans, when breeding forages within a few hundred feet of colony	LE (Federal) E (State)	Texas	Bexar County
Tortoise, Texas	*Gopherus berlandieri*	open brush with a grass understory is preferred; open grass and bare ground are avoided; when inactive occupies shallow depressions at base of bush or cactus, sometimes in underground burrows or under objects; longevity greater than 50 years; active March-November; breeds April-November	T (State)	Texas	Bexar County
Twistflower, Bracted	*Streptanthus bracteatus*	Texas endemic; shallow, well-drained gravelly clays and clay loams over limestone in oak juniper woodlands and associated openings, on steep to moderate slopes and in canyon bottoms; several known soils include Tarrant, Brackett, or Speck over Edwards, Glen Rose, and Walnut		Texas	Bexar County

		geologic formations; populations fluctuate widely from year to year, depending on winter rainfall; flowering mid April-late May, fruit matures and foliage withers by early summer			
Vireo, Black-capped	*Vireo atricapilla*	oak-juniper woodlands with distinctive patchy, two-layered aspect; shrub and tree layer with open, grassy spaces; requires foliage reaching to ground level for nesting cover; return to same territory, or one nearby, year after year; deciduous and broad-leaved shrubs and trees provide insects for feeding; species composition less important than presence of adequate broad-leaved shrubs, foliage to ground level, and required structure; nesting season March-late summer	LE (Federal) E (State)	Texas	Bexar County
Warbler, Golden-cheeked	*Dendroica chrysoparia*	juniper-oak woodlands; dependent on Ashe juniper (also known as cedar) for long fine bark strips, only available from mature trees, used in nest construction; nests are placed in various trees other than Ashe juniper; only a few mature junipers or nearby cedar brakes can provide the necessary nest material; forage for insects in broad-leaved trees and shrubs; nesting late March-early summer	LE (Federal) E (State)	Texas	Bexar County

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7.0 ENDANGERED AND THREATENED SPECIES BY STATE AND EPA PLANNING DISTANCE AND SENSITIVITY MAPS

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE	COUNTY
Wild-mercury, Hill Country	*Argythamnia aphoroides*	Texas endemic; mostly in bluestem-grama grasslands associated with plateau live oak woodlands on shallow to moderately deep clays and clay loams over limestone on rolling uplands, also in partial shade of oak-juniper woodlands in gravelly soils on rocky limestone slopes; flowering April-May with fruit persisting until midsummer		Texas	Bexar County
Wolf, Gray	*Canis lupus*	extirpated; formerly known throughout the western two-thirds of the state in forests, brushlands, or grasslands	LE (Federal) E (State)	Texas	Bexar County
Wolf, Red	*Canis rufus*	extirpated; formerly known throughout eastern half of Texas in brushy and forested areas, as well as coastal prairies	LE (Federal) E (State)	Texas	Bexar County
Woollywhite, Sandhill	*Hymenopappus carrizoanus*	Texas endemic; disturbed or open areas in grasslands and post oak woodlands on deep sands derived from the Carrizo Sand and similar Eocene formations; flowering April-June		Texas	Bexar County

T - Threatened
E - Endangered

Reference:
- Texas Parks & Wildlife Dept. - Annotated County Lists of Rare Species

8.0 VULNERABILITY ANALYSIS (DETAILED)

VULNERABILITY ANALYSIS (DETAILED)
Water Intakes:

(b) (7)(F), (b) (3)

Schools:
(b) (7)(F), (b) (3)
Medical Facilities:
There are no hospitals located along the spill pathway from the terminal.
Residential Areas:
Residential developments are located south of the terminal on the southern side of Houston Street. Due to the low lying topography on the south adjacent property, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property.

8.0 VULNERABILITY ANALYSIS (DETAILED) , CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Businesses:
Commercial developments are located to the north and west of the terminal property. Due to the low lying topography on the south adjacent property, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property.
Wetlands or Other Sensitive Environments:
The United States Geological Survey (USGS) Topographic Map for the San Antonio East, Texas Quadrangle does not indicate any wetlands within 2 miles of the terminal or along the potential spill pathway.
Fish and Wildlife:
Refer to SECTION 6.5, Endangered and Threatened Species by State.
Lakes and Streams:
The San Antonio Terminal is roughly 1.3 miles northwest of Rosillo Creek and 1.4 miles northeast of Salado Creek. The route of travel for spilled oil from the terminal is southwest from the tank farm into the south adjacent property. Due to the low lying topography on the south adjacent property, and existing out of service rail bed, it is unlikely that a potential worst case discharge would flow beyond the south adjacent property. Therefore, it is believed a spill would not likely impact these waterways.

8.0 VULNERABILITY ANALYSIS (DETAILED), CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Endangered Flora and Fauna:
Refer to SECTION 6.5, Endangered and Threatened Species by State.
Recreational Areas:
No parks or other recreational areas are located the vicinity of the terminal.

Transportation Routes (Air, Water, Land):
If a spill occurred at this terminal, it may be necessary to close transportation routes in the area. Schools with transportation routes potentially affected by a worst case discharge include: Kirby Elementary School, Pfeiffer Elementary School, Davis Middle School, Sam Houston High School, Carroll Elementary School, and Hirsch Elementary School. Due to spill drainage routes and the availability of alternative transportation routes for the schools, a spill is unlikely to impact the daily operations of the schools. However, if a spill were to impact Houston Street, Interstate 410, Interstate 10, or interstate access roads, the schools should be notified and instructed to use alternate transportation routes.
Utilities:
There are no utilities in the facility area that could potentially be impacted by a worst case discharge scenario.
Other Applicable Areas:

9.0 TACTICAL OVERVIEW MAP

10.0 TACTICAL PLAN INDEX

SITE #	SITE NAME
Site 1	Field Depression
Site 2	Field Berm
Site 3	410 South Feeder

11.0 TACTICAL PLANS

Click here for Site 1 - Field Depression

11.0 TACTICAL PLANS , CONTINUED

Click here for Site 2 - Field Berm

11.0 TACTICAL PLANS , CONTINUED

Click here for Site 3 - 410 South Feeder

12.0 TERMINAL SENSITIVITY MAPS

Click here for Map 1 of 1

LINK FILES

Eagle Construction &
Environmental Services, LP
414 FM 1103
Cibolo, Texas 78108

January 7, 2009

Kin Gerold
Koch Pipeline Company, LP
PO Box 64596
St. Paul, MN 55164

Re: Self Certification Of Oil Spill Equipment Deployment / Exercise, "Annual Revision"
USCG OSRO Certification No. 0085

Ms. Gerold:

The National Preparedness for Response Exercise Program (PREP) sets guidelines to address exercise requirements for Oil Spill Removal Organizations (OSRO). In keeping with these guidelines and being identified in **Koch Pipeline Company, LP** Response Plan, **Eagle** is obligated to deploy a representative sample of each piece of response equipment listed in our inventory. Each item has been deployed and exercised in the environment in which it was intended to operate.

Eagle has deployed, either in training or during actual spills, a piece of Oil Spill Response Equipment that will represent all of the items listed in our response inventory. This includes but is not limited to various company owned pumps, booms, boats and excavation equipment.

The actual deployments/exercises in 2007 were as follows:

ACTUAL DEPLOYMENTS

Texas Divisions

- January 2007-Eagle responded to a 1,500 gallon jet fuel release at the San Antonio International Airport. 1000 feet of containment boom, skimmers, sorbents and vacuum trucks were used to remove the product.

- March 2007-Eagle responded to a train derailment in west Texas that resulted in an oil spill in a river. Eagle deployed 500 feet of containment boom to control the oil. A vacuum truck was used to remove the oil.

- May 2007-Eagle responded to an oil spill that impacted a cooling tower at a power plant in San Antonio, TX. Containment boom was used to control the spread of the oil. Vacuum trucks and sorbents were utilized to remove the oil.

- July 2007-Eagle responded to a 7,000 bbl jet fuel spill in Huntsville TX. Eagle deployed 3000 feet of boom and built underflow dams to control the release that impacted over 4 miles of Turkey Creek. 15 vacuum trucks and 5 drum skimmers were used to remove the fuel. 50 frac tanks were used to stage the fuel prior to disposal.

- August 2007-Eagle responded to an oil spill at an East Texas power plant. Oil from the impacted the lake. 1,000 feet of containment boom was used to control the oil.

- September 2007-Eagle deployed 1,000 feet of containment boom in the water intakes of a power plant near San Antonio, TX. The boom was kept in place during construction at the power plant. Eagle maintained the boom during the two month project.

- September 2007-Eagle deployed 500 feet of containment boom north of Tulsa, Oklahoma to control oil from that was released during the floods in the area. Sorbents were used to remove the oil.

- October 2007-Eagle responded to 1,000 bbl fuel release from a pipeline in south east Texas. Eagle utilized 200 feet of containment boom and trac hoes to control the release of product.

- December 2007-Eagle deployed 1,500 feet of containment boom on Lake Worth in Lake Worth, Texas to contain diesel fuel leaking from a boat that had begin to sink.

Ohio Division

- January 2007-Eagle responded to an unknown amount of oil released in Akron, OH that migrated through drainage tiles into a retention pond. Cleanup crews deployed over 2,000 feet of containment boom as well as 1,000 feet of absorbent materials. In addition, 2 vacuum trucks, 2 drum skimmers and boats were used in the effort.

- March 2007-Eagle deployed 1,600 feet of containment/absorbent boom in Toledo, OH to contain a diesel fuel spill in the Ottawa River. Eagle responded with a Hi-Rail vacuum truck, frac tanks, boats and an excavator to remove the oil from the frozen river.

- May 2007-Eagle responded to Willard, OH to a 2,000 gallon fuel spill. The spill was contained with containment/absorbent booms and underflow dams. The fuel was removed with vacuum trucks and 2 drum skimmers

Louisiana Division

- August 2007-Eagle responded to a gas well blowout. Eagle deployed 1,000 feet of containment boom to control the released liquids from the well.

EXCERCISES

- January 2007-Eagle took part in a spill drill a fuel storage facility in Fort Worth. A "worst case scenario" was discussed during the event.

- March 2007-Eagle deployed 2,000 feet of containment boom during a "worst case scenario" spill drill at a fuel storage facility in San Antonio, TX. State and local officials attended the full-scale drill.

- April 2007-Eagle attended a table top spill drill in east Texas for a pipeline company. The drill involved all the surrounding fire departments and city and state officials.

- May 2007-Eagle attended a table top drill scenario and contractor orientation for a petro-chemical company in Findlay, OH.

- October 2007-Eagle participated in a "worst case discharge scenario" for a petro-chemical company in Waco, TX. In addition to the Waco location, discussions were made for the facilities in San Antonio, Austin, and Fort Worth, Texas.

- November 2007-Eagle attended a table top spill drill in Sweetwater, TX for a pipeline company. The drill involved a "worst case scenario" release of product on the local water supply.

Other responses have occurred that fulfill the PREP requirements and documentation is available upon request. Eagle maintains documentation to verify testing and maintenance of all spill response equipment. All response personnel are trained to CFR 1910.120 and certificates are available upon request.

Please feel free to contact me at (210) 566-8366, toddj@ecesi.com, or on my cell phone at (817) 966-1493, if I can be of any further assistance.

In the event of an emergency, please call (800) 336-0909.

Sincerely,
Eagle Construction and Environmental Services, LP

Todd Johnson
Corporate Emergency Response Manager

Oil Spill Response Equipment Inventory
Ft. Worth Division

Containment Boom:

4000 feet of More Boom 18-inch boom - *pre loaded on two trailers 1000' each*
400 feet of More Boom10 inch boom
200 feet of More Boom 6-inch mini boom

Oil Skimmers:

Douglas Engineering, Skim Pac Mod. 18000 vacuum skimmer
Folex vacuum skimmer
3- Elastec single/double barrel drum skimmers (15-75 gpm)

Boats:

(2) Lowe 16 foot jon boat with 25-hp outboard motor
(3) Alumacraft 16 foot jon boat with 25-hp outboard motor
Generation 3, 18 foot flat bottom boat with 35-hp outboard motor

Frac Tanks:

(2) 1993 Herring frac tank
(9) 1993 VE Enterprises frac tank
(1) 1999 Modern Mfg. frac tank
(2) 1998 Frontier 500 bbl frac tank
(2) 1999 shop built skid mounted 8000 gallon tank

Vacuum Trailer and Trucks:

(1) 1991 130 BBL vacuum trailer
(1) 130 bbl 2000 Pioneer vacuum trailer
(1) 130 bbl 1990 Indou vacuum trailer
(1) 100 bbl 1985 Keith Huber vacuum trailer
(1) 100 bbl 1987 Keith Huber vacuum trailer
(1) 60 bbl 1977 Mack RS 686ST vacuum truck
(1) 60 bbl 1991 Kenworth T800 vacuum truck

Ft. Worth Division - Continued

Oil Spill Response Trailer:

Absorbent boom
Absorbent pads
Assorted hand tools
Banner tape
Boat oars
Bow saws
Chain saws
Chest waders
Decon solution
Dip nets
Fiber pearl absorbent
Fire extinguishers
Flash lights
Fuel cans
Leaf blowers
Life jackets
Peat moss absorbent
Pollution cans
Poly debris bags - 6 mil.
Poly sheeting - 6 mil.
PPE
Propane pear burners
Propane tanks
Pump sprayers
Rope
Universal boom couplers
Wash pumps and hose
Weed eaters
Wooden stakes

Bulk absorbents and additional supplies are stored in the Ft. Worth warehouse for rapid deployment.

OFFICE LOCATIONS

Corporate Office:	9701 East I-20 Eastland, Texas 76448 Phone: (254) 629-1718 Fax: (254) 629-8625	Contact: Marc Walraven E-Mail: marcw@ecesi.com Cell: (817) 829-7569
Fort Worth Office:	9204 Highway 287 N.W. Fort Worth, Texas 76131 Phone: (817) 847-1333 Fax: (817) 306-8086	Contact: JT Ponder E-mail: jtponder@ecesi.com Cell: (817) 829-0647
La Porte Office:	1700 North E Street La Porte, Texas 77571 Phone: (281) 867-9131 Fax: (281) 867-9150	Contact: Reggie Grimes E-mail: reggieg@ecesi.com Cell: (281) 541-7826
San Antonio Office:	414 FM1103 Cibolo, Texas 78108 Phone: (210) 566-8366 Fax: (210) 566-6247	Contact: Mark Anderson E-mail: marka@ecesi.com Cell: (210) 825-9167
Louisiana Office:	10049 Industriplex Gonzales, Louisiana 70737 Phone: (225) 677-7877 Fax: (225) 677-5474	Contact: Mark Allen E-mail: markallen@ecesi.com Cell: (225) 235-1403
Ohio Office:	3820 Ventura Drive Findlay, Ohio 45840 Phone: (419) 425-5845 Fax: (419) 425-5851	Contact: John Seifert E-mail: johns@ecesi.com Cell: (419) 348-4127
Tennessee Office:	1877 S. Roane Street Harriman, Tennessee 37748 Phone: (865) 882-7717 Fax: (865) 882-7719	Contact: David Dyer E-mail: davidd@ecesi.com Cell: (865) 338-5378

Corporate Emergency Response Manager-Todd Johnson (210) 566-8366 office, (817) 966-1943 cell
toddj@ecesi.com

MILLER ENVIRONMENTAL SERVICES, INC.

(OSRO) OIL SPILL REMOVAL ORGANIZATION INFORMATION

REVISED 1/21/08

MILLER ENVIRONMENTAL SERVICES, INC.
600 FLATO ROAD
CORPUS CHRISTI, TX. 78405

MAILING ADDRESS:
P.O. BOX 5233
CORPUS CHRISTI, TX. 78405

ADDITIONAL FACILITIES:
2208 INDUSTRIAL DRIVE
SULPHUR, LA. 70665

HOT LINE 1-800-929-7227

EMERGENCY CONTACTS: BRIAN COX, MATT DARTEZ, MACKEY WARD, JOHN PERABO

LATITUDE: (b) (7)(F), (b)
LONGITUDE: (b) (7)(F), (b)

OSRO CLASSIFICATIONS

ENVIRONMENTS	FACILITY					VESSEL			
	HVP	MMPD	WCD1	WCD2	WCD3	MMPD	WCD1	WCD2	WCD3
RIVERS / CANALS	YES	X	X	X	X	X	X	X	X
INLAND	YES			X	X	X	X	X	X
OCEAN									
GREAT LAKES									

EL99

PERSONNEL

Description	Location
20 - Supervisors	Corpus Christi, TX
6 - Supervisors	Sulphur, LA
2 - Supervisors	Port Arthur, TX
12 - Foreman	Corpus Christi, TX
6 - Foreman	Sulphur, LA
1 - Foreman	Port Arthur, TX
33 - Operators	Corpus Christi, TX
6 - Operators	Sulphur, LA
3 - Operators	Port Arthur, TX
34 - Technicians	Corpus Christi, TX
10 - Technicians	Sulphur, LA
3 - Technicians	Port Arthur, TX

BOATS

Description	Location
1 - 14' 350 HP Air Ranger Air Boat	Corpus Christi, TX
1 - 18' 400 HP Trail Boss Air Boat	Sulphur, LA
4 - 14' t 16' Jon Boats w/ 25 HP Outboard Motors	Corpus Christi, TX
2 - 14' to 16' Jon Boats	Sulphur, LA
2- 16' Jon Boats w/ 25 HP Outboard Motors	Sulphur, LA
4 - 16' to 18' Jon Boats w/ Outboard Motors	Corpus Christi, TX
1 - 18' Work Boat w/ 90 HP Outboard Motor	Sulphur, LA
1 - 18' Work Boat w/ 90 HP Outboard Motor	Corpus Christi, TX
1 - 18' Work Boat w/ 115 HP Outboard Motor	Corpus Christi, TX
1 - 28' Fast Response Boat w/ Twin Outboard Motors	Corpus Christi, TX
1 - 26' Fast Response Boat w/ Twin Outboard Motors	Sulphur, LA
1 - 24' Push Boat w/ 150 HP Outboard Motor	Corpus Christi, TX
1 - 22' Fast Response Boat w/ 200 HP Outboard Motor	Corpus Christi, TX
1 - 18' Work Boat w/ 70 HP Outboard Motor	Port Arthur, TX

SKIMMERS AND PUMPS

DESCRIPTION	LOCATION
1 - MARCO SIDE WINDER 14 HARBOR VOSS SKIMMER	CORPUS CHRISTI, TX
1 - FOILEX TDS 250 SKIMMING SYSTEM	CORPUS CHRISTI, TX
1 - ACME SAUCER SKIMMER 48"	SULPHUR, LA
1- SLURP FLOATING SKIMMER	CORPUS CHRISTI, TX
2- ELASTEC TDS 136 DRUM SKIMMER	CORPUS CHRISTI, TX
1- ELASTEC TDS 118 DRUM SKIMMER	CORPUS CHRISTI, TX
1- ELASTEC TDS 136 DRUM SKIMMER	SULPHUR, LA
2 - 36" GOO GOBBLER SKIMMER	SULPHUR, LA
2 - 36" SKIMPAK SKIMMER	SULPHUR, LA
1 - SKIMMEX VACUUM SKIMMER W/HOPPER	CORPUS CHRISTI, TX
2 - 2" WASH PUMP	CORPUS CHRISTI, TX
4 - 2" WASH PUMPS	SULPHUR, LA
10 - LIGHT WASH PUMPS	CORPUS CHRISTI, TX
4 - 2" PNEUMATIC DIAPHRAGM PUMPS	CORPUS CHRISTI, TX
2 - 2" PNEUMATIC DIAPHRAGM PUMPS	SULPHUR, LA
1 - 2" PNEUMATIC DIAPHRAGM CHEMICAL PUMP	SULPHUR, LA
2 - 3" PNEUMATIC DIAPHRAGM PUMPS	CORPUS CHRISTI, TX
3 - PORTABLE HIGH PRESSURE STEAM CLEANERS	CORPUS CHRISTI, TX
1 - PORTABLE HIGH PRESSURE STEAM CLEANER	SULPHUR, LA
1000 - FT. 2" OS&D HOSE	CORPUS CHRISTI, TX
1000 - FT. 2" OS&D HOSE	SULPHUR, LA
2000 - FT. 3" OS&D HOSE	CORPUS CHRISTI, TX
2000 - FT. 3" OS&D HOSE	SULPHUR, LA
400 - FT. 4" OS&D HOSE	CORPUS CHRISTI, TX
400 - FT. 4" OS&D HOSE	SULPHUR, LA

VEHICLES AND TRAILERS

DESCRIPTION	LOCATION
37 - PICK UP TRUCKS	CORPUS CHRISTI, TX
10 - PICK UP TRUCKS	SULPHUR, LA
11 - 4 X 4 PICK UP TRUCKS	CORPUS CHRISTI, TX
4 - 4 X 4 PICK UP TRUCKS	SULPHUR, LA
25 - 70 BBL SUPERVAC D.O.T. SPEC. VACUUM TRUCKS	CORPUS CHRISTI, TX
3 - 70 BBL SUPERVAC D.O.T. SPEC. VACUUM TRUCKS	SULPHUR, LA
6 - 16 CUBIC YARD SUPERSUCKER AIR MOVERS	CORPUS CHRISTI, TX
4 - 16 CUBIC YARD SUPERSUCKER AIR MOVERS	SULPHUR, LA
4 - 130 BBL VACUUM TRUCK D.O.T. SPEC.	CORPUS CHRISTI, TX
1 - 130 BBL VACUUM TRUCK D.O.T. SPEC.	SULPHUR, LA
4 - BOB TAIL (5 AXLE) ROLL OFF TRUCKS	CORPUS CHRISTI, TX
1 - BOB TAIL (5 AXLE) ROLL OFF TRUCKS	SULPHUR, LA
6 - ROLL OFF TRUCKS (TRACTOR/TRAILER)	CORPUS CHRISTI, TX
6 - BOOM TRAILERS	CORPUS CHRISTI, TX
3 - BOOM TRAILER	SULPHUR, LA
3 - BOOM AND BOAT TRAILERS W/ 2000' 18" BOOM EA./BOATS/PUMPS	CORPUS CHRISTI, TX
1 - BOOM AND BOAT TRAILERS W/ 2000' 18" BOOM EA./BOATS/PUMPS	SULPHUR, LA
1 - BOOM AND BOAT TRAILERS W/ 2000' 18" BOOM EA./ BOATS/ PUMPS	PORT ARTHUR, TX
4 - RESPONSE TRAILERS	CORPUS CHRISTI, TX
8 - EQUIPMENT TRAILERS	CORPUS CHRISTI, TX
2 - EQUIPMENT TRAILERS	SULPHUR, LA
1 - EMERGENCY RESPONSE UNIT / FIELD OFFICE	CORPUS CHRISTI, TX
1 - HAZ-MAT RESPONSE TRAILER W/ COMMAND CENTER	SULPHUR, LA
1 - HAZ-MAT RESPONSE TRAILER	CORPUS CHRISTI, TX

TEMPORARY STORAGE

DESCRIPTION	LOCATION
160 - 500 BBL FRAC TANKS (NON-DEDICATED)	SULPHUR, LA
200 - 20 YARD ROLL OFF BOXES (NON-DEDICATED)	SULPHUR, LA
2 - 20 YARD ROLL BOXES	SULPHUR, LA
90 - ROLL OFF STORAGE AND TRANSPORTATION CONTAINERS	CORPUS CHRISTI, TX

BOOMING SYSTEMS

DESCRIPTION	LOCATION
16,000 - FT. 18" CONTAINMENT BOOM	CORPUS CHRISTI, TX
6,000 - FT. 18" CONTAINMENT BOOM	SULPHUR, LA
2,000 - FT. 18" CONTAINMENT BOOM	PORT ARTHUR, TX
2,000 - FT. 10" CONTAINMENT BOOM	CORPUS CHRISTI, TX
600 - FT. 10" CONTAINMENT BOOM	SULPHUR, LA
32,000 FT. 18" CONTAINMENT BOOM (NON-DEDICATED)	HOUSTON, TX
8 - 24" MARKER BUOYS	SULPHUR, LA
6 - 24" MARKER BUOYS	PORT ARTHUR, TX
8 - 25 LBS. DANFORTH ANCHORS	SULPHUR, LA
6 - 25 LBS. DANFORTH ANCHORS	PORT ARTHUR, TX
10 - BOOM WARNING LIGHTS	SULPHUR, LA

MISCELLANEOUS EQUIPMENT AND EXPENDABLES

Description	Location
400 - 1A2/Y1.6/150.97 55 Gal. Steel Open Top Drums	Sulphur, LA
150 - 1A2/Y1.6/150.97 55 Gal. Steel Open Top Drums	Corpus Christi, TX
50 - 17/E 55 Gal. Steel Open Top Drums	Corpus Christi, TX
10 - 95 Gallon Poly Over Packs	Sulphur, LA
10 - 85 Gallon Poly Over Packs	Corpus Christi, TX
Whse. Inv. - 17 x 19 x 3/8 12 oz. Sorbent Pads ,Dimpled	Sulphur, LA
Whse. Inv. - 17 x 19 x 3/8 12 oz. Sorbent Pads, Dimpled	Corpus Christi, TX
Whse. Inv. - 17 x 19 x 1/4 9 oz. Sorbent Pads, Dimpled	Sulphur, LA
Whse. Inv. - 17 x 19 x 1/4 9 oz. Sorbent Pads, Dimpled	Corpus Christi, TX
Whse. Inv. - 38 x 144 12 oz. Sorbent Rolls, Dimpled	Sulphur, LA
Whse. Inv. - 38 x 144 12 oz. Sorbent Rolls, Dimpled	Corpus Christi, TX
Whse. Inv. 38 x 144 9 oz. Sorbent Rolls, Dimpled	Sulphur, LA
Whse. Inv. 38 x 144 9 oz. Sorbent Rolls, Dimpled	Corpus Christi, TX
Whse. Inv. 8 x 10 Sorbent Boom Double Net	Sulphur, LA
Whse. Inv. 8 x 10 Sorbent Boom Single Net	Corpus Christi, TX
Whse. Inv. 17 x 19 x 12 oz. Chemical Sorbent Pads	Sulphur, LA
Whse. Inv. 17 x 19 x 12oz. Chemical Sorbent Pads	Corpus Christi, TX
Whse. Inv. 100 x 18 Sorbent Sweep	Sulphur, LA
Whse. Inv. 100 x 18 Sorbent Sweep	Corpus Christi, TX
Whse. Inv. (30/Box) Sorbent Snare	Sulphur, LA
Whse. Inv. (30/Box) Sorbent Snare	Corpus Christi, TX
Whse. Inv. Clay Particulate Absorbent	Sulphur, LA
Whse. Inv. Clay Particulate Absorbent	Corpus Christi, TX

MISCELLANEOUS EQUIPMENT AND EXPENDABLES

DESCRIPTION	LOCATION
1 - 175 CFM AIR COMPRESSOR	CORPUS CHRISTI, TX
2 - 4 KW GENERATORS	CORPUS CHRISTI, TX
2 - 4 KW GENERATORS	SULPHUR, LA
10- 800 MHZ RADIOS	CORPUS CHRISTI, TX
5 - 800 MHZ RADIOS	SULPHUR, LA
3 - MULTI-GAS DIRECT READ AIR MONITORS (NON-DEDICATED)	CORPUS CHRISTI, TX
1 - AIM 3000 MULTI-GAS DIRECT READ AIR MONITOR	SULPHUR, LA
1 - SYNSIDYNE COLORMETRIC PUMP / MONITOR	SULPHUR, LA
1 - MSA - 3 GAS MONITOR	SULPHUR, LA
1 - PID AIR MONITOR (NON-DEDICATED)	CORPUS CHRISTI, TX
3 - H2S MONITORS (NON-DEDICATED)	CORPUS CHRISTI, TX

HYDROBLASTING EQUIPMENT (DECON)

DESCRIPTION	LOCATION
1 - 11 GPM 20K HYDROBLASTER	CORPUS CHRISTI, TX
1 - 28 GPM 10K HYDROBLASTER	CORPUS CHRISTI, TX
1 - 47 GPM 10K HYDROBLASTER	CORPUS CHRISTI, TX
1 - 34 GPM 10K HYDROBLASTER	SULPHUR, LA
1 - 68 GPM 10K HYDROBLASTER	SULPHUR, LA
1 - 47 GPM 10K HYDROBLASTER W/ 20K CONVERTER PRESSURE HEAD	SULPHUR, LA
1 - 21 GPM 20K HYDROBLASTER	SULPHUR, LA
1 - HIGH PRESSURE CUTTING MACHINE W/ ACCESSORIES	CORPUS CHRISTI, TX

MILLER ENVIRONMENTAL=S INDUSTRIAL SERVICES DIVISION, CLEANS AND DECONTAMINATES TANKS, VESSELS AND PLANT EQUIPMENT DAILY, ENHANCING OUR ABILITIES TO DECONTAMINATE RESPONSE EQUIPMENT AND VESSELS ON SITE.

MILLER ENVIRONMENTAL SERVICES, INC.
2008 SPILL RESPONSE LOG

DATE	LOCATION	EQUIPMENT
1/15/08 08-0100	REDFISH BAY	1- RESPONSE BOAT 1200' – 18"CONT. BOOM 5 – PERSONNEL 1 – RESPONSE TRAILER
2/5/08 08-0149	PORT ARANSAS	1 - RESPONSE BOATS 300' – 18" CONT. BOOM 8 – PERSONNEL 1 – VACUUM TRUCK 1 – DRUM SKIMMER
2/17/08 08-0195	SAN ANTONIO RIVER	1 – RESPONSE TRAILER 400' – 18" CONT. BOOM 1 – RESPONSE BOAT 4 – PERSONNEL
3/6/08 08-0316	CORPUS CHRISTI BAY	1000' – 18" CONT. BOOM 4– PERSONNEL 1 – RESPONSE BOAT
3/21/08 08-0342	MAYO RANCH - TAFT, TX	2 – VACUUM TRUCKS 1700' – 10" CONT. BOOM 10 – PERSONNEL 1 – RESPONSE TRAILER
5/17/08 08-0492	ARANSAS BAY	2 – RESPONSE BOATS 1700' – 18" CONT. BOOM 2 – BOOM TRAILER 8 – PERSONNEL 1 – RESPONSE TRAILER
6/29/08 08-0607	REDFISH BAY	2 – RESPONSE BOATS 500' – 18" CONT. BOOM 5 – PERSONNEL 1 – RESPONSE TRAILER
7/13/08 08-0607	REDFISH BAY	1 – RESPONSE BOAT 300' – 18" CONT. BOOM 3 – PERSONNEL 1 – RESPONSE TRAILER

7/15/08 08-0607	REDFISH BAY	1 – RESPONSE BOAT 300' – 18" CONT. BOOM 3 – PERSONNEL 1 – RESPONSE TRAILER
8/4/08 08-0694	CORPUS CHRISTI BAY	1 – RESPONSE BOAT 400' – 18" CONT. BOOM 8 – PERSONNEL 1 – RESPONSE TRAILER
8/12/08 08-0708	CORPUS CHRISTI SHIP CHANNEL	1 – RESPONSE BOAT 1100' – 18" CONT. BOOM 3 - PERSONNEL

KOCH

CONTRACTUAL RISK MANAGEMENT

BILL BURGIN
CRM Legal Assistant

August 24, 2005

Via Facsimile: 361-289-6363

Mr. Mackey Ward
Miller Environmental Services, Inc.
600 Flato Road
Corpus Christi, TX 78405

Re: Agreement #9700335-A

Dear Mr. Ward:

Your company currently has in effect an Agreement dated April 24, 1997 (as amended, if applicable) (herein, the "Agreement") with Flint Hills Resources, LP, Koch Energy, Inc., Koch Pipeline Company, L.P., and Reiss Remediation, Inc. The purpose of this letter is as discussed below:

Due to an internal merger, Reiss Remediation, Inc. is now Reiss Remediation, LLC.

Please note that, except for the change to the Agreement set forth above, the terms, covenants and conditions of the Agreement will remain in full force and effect.

A request has been forwarded to your insurance company to provide a current insurance certificate incorporating the modification stated above.

If you have any questions, please give me a call at (316) 828-5675.

Sincerely,

Bill Burgin

Bill Burgin

4111 East 37th Street North • Wichita, Kansas 67220 • P.O. Box 2256 • Wichita, Kansas 67201
316/828-5675 • FAX 316/828-9063 or 316/828-9824

KOCH

SECOND REQUEST
10-28-04

KOCH RISK MANAGEMENT SERVICES

MICHELLE P. BUTTERFIELD
LEGAL ASSISTANT

October 22, 2004

VIA FACSIMILE: 361-289-6363

Mr. Mackey Ward
Miller Environmental Services, Inc.
600 Flato Road
Corpus Christi, Texas 78405

Re: Amendment to Intermittent Services Agreement 9700335-A
Flint Hills Resources, LP
Koch Pipeline Company, L P
Koch Energy, Inc
Reiss Remediation, Inc

Dear Mr. Ward:

Miller Environmental Services, Inc. ("Contractor") currently has in effect an Intermittent Services Agreement ("ISA") dated April 24, 1997, as amended December 1, 1999; January 1, 2001; January 15, 2001, with the above referenced Koch company(s) The purpose of this amendment is to amend the ISA to add two new paragraphs, as further defined below:

Koch proposes amending the ISA to add the following language to the end of the main body of the ISA as a new Paragraph 26·

26. CONFIDENTIALITY. All information that Contractor acquires from Company hereunder, directly or indirectly, and all information that arises out of the Work performed hereunder, concerning such Work and/or proprietary processes involved in the Work, including without limitation, information concerning Company's current and future business plans, information relating to Company's operations, and other Company-furnished information and know-how relating to the Work shall be deemed Company's "Proprietary Information." Company's Proprietary Information shall be held in strictest confidence by Contractor and shall be used solely for purposes of performing such Services. The obligations under this Paragraph shall survive completion of such work/services and termination of this Agreement

In addition, Koch proposes adding certain clarification language to the ISA. For the convenience of the parties, and in order to reduce the necessity of having multiple agreements, the term "Company," as used in the ISA, currently includes multiple entities.

Koch proposes amending the ISA to add the following language to the end of the main body of the ISA as a new Paragraph 27, effective upon your company's execution of this letter amendment·

27. **MULTIPLE ENTITIES.** The parties recognize and acknowledge that "Company," as defined above, includes more than one entity. Contractor agrees that each such entity will be separately, not jointly, responsible for the obligations hereunder as relating to work performed for such entity.

Reiss Remediation Company merged into Reiss Remediation Company , thus Reiss Remediation Company can be deleted from the ISA and on any future certificate of insurance as it relates to the ISA

Under this proposed amendment letter, future work/services performed by your company for any of the above referenced Koch companies will be done pursuant to the ISA dated April 24, 1997, as previously amended, if applicable, and this amendment dated October 22, 2004

If you agree with this amendment letter, please sign in the appropriate space below and return this letter to Michelle P. Butterfield, CRM Legal Assistant, Koch Legal Services, Koch Industries, Inc , P.O. Box 2256, Bldg T5G, Wichita, Kansas 67201.

Sincerely,

Michelle P. Butterfield

Michelle P. Butterfield
CRM Legal Assistant
Enc.

AGREED AND ACCEPTED:
Miller Environmental Services, Inc.

By: Mackey Ward
Printed Name: MACKEY WARD
Title: OPERATIONS MANAGER
Date: 11/4/04

KOCH INDUSTRIES INC

LEGAL DEPARTMENT

LYNDA L. WENINGER
LEGAL ASSISTANT

January 15, 2001

VIA FACSIMILE: 361-289-6363

Mr. Matt Darlez
Miller Environmental Services, Inc.
600 Flato Road
Corpus Christi, Texas 78405

Re: Amendment to Intermittent Services Agreement 9700135-A
Gulf South Pipeline Company, LP — Koch Energy, Inc.
Koch Petroleum Group, L.P. — Koch Pipeline Company, L.P.,

Dear Mr. Darlez:

Your company currently has in effect an Intermittent Services Agreement ("ISA") dated April 24, 1997, as amended December 1, 1999, with the above referenced Koch companies. From time to time other affiliated Koch companies may need your services. The purpose of this letter is to propose adding Reiss Remediation Company and Reiss Remediation, Inc. to the ISA.

Koch proposes amending the term "Company," as that term is used in the ISA dated April 24, 1997, to include all of the following Koch companies:

Gulf South Pipeline Company, LP
Koch Energy, Inc.
Koch Petroleum Group, L.P.
Koch Pipeline Company, L.P.
Reiss Remediation Company
Reiss Remediation, Inc.

Under this proposed amendment letter, future work/services performed by Miller Environmental Services, Inc. for any of the above referenced Koch companies will be done pursuant to the ISA dated April 24, 1997, the amendment dated December 1, 1999, and this amendment dated January 15, 2001.

A copy of the enclosed Exhibit C-Certificate of Insurance reflecting this amendment has been forwarded to your insurance agency. Please ask your agent to complete the Exhibit C to evidence your current insurance coverage and the required endorsements. Koch requires the alternate employer and waiver of subrogation endorsements under the workers compensation-employer liability policy, and the additional insured endorsement (CG 20 10 10 93 or CG 20 10 03 97) under the general liability and any applicable umbrella/excess liability policy.

4111 East 37th Street North • Wichita, Kansas 67220 • P.O. Box 2256 • Wichita, Kansas 67201
316/828-5587 • FAX 316/828-7664

If you agree with this amendment letter, please sign in the appropriate space below and return this letter to Lynda L. Weninger, I.S.A. Administrator, Legal Department, Koch Industries, Inc., P.O. Box 2256, Bldg. T3D, Wichita, Kansas 67201.

Sincerely,

Lynda L. Weninger
I.S.A. Administrator/Legal Assistant

Enclosures

AGREED AND ACCEPTED:
Miller Environmental Services, Inc.

By: Mackey Ward
Printed Name: MACKEY WARD
Title: OPERATIONS MANAGER
Date: 2/6/01

INTERMITTENT SERVICES AGREEMENT 9700335G-A

This Intermittent Services Agreement ("Agreement") is entered into this 1st day of January 2001, but effective as of the date specified below, by and between:

(i.) **Miller Environmental Services, Inc.** ("Contractor"); and

(ii.) **Koch Gateway Pipeline Company** (as of the Effective Date specified below, Koch Gateway Pipeline Company will be known as **Gulf South Pipeline Company, LP**) ("Company").

WHEREAS, attached hereto as Exhibit "1" is a copy of the Intermittent Services Agreement 9700335G-A dated April 24, 1997, as amended, by and between Contractor, Company, and the other parties listed therein (such agreement, including all amendments and exhibits thereto, shall be referred to as the "Original Intermittent Services Agreement");

AND, WHEREAS, Contractor and Company desire to enter into a new Intermittent Services Agreement that contains the same substantive terms and conditions as the Original Intermittent Services Agreement, but that is between only Contractor and Company.

NOW, THEREFORE, Contractor and Company state and agree as follows:

1. The terms and conditions contained in the Original Intermittent Services Agreement, a copy of which is attached hereto as Exhibit 1, are hereby made a part of this Agreement, the same as if such terms and conditions were fully set forth herein; provided, however, that: (i.) the term "Company," as used in such terms and conditions for purposes of this Agreement, shall mean only Koch Gateway Pipeline Company and Gulf South Pipeline Company, LP; and (ii.) the business and notice address for Company, for purposes of this Agreement, shall be 20 Greenway Plaza, Houston, Texas 77046.

The effect of the execution of this Agreement by the parties is that, from and after the Effective Date as defined below, an Intermittent Services Agreement will be in place between Contractor and Company that contains the same terms and conditions as the Original Intermittent Services Agreement, except as expressly modified herein.

2. The effective date ("Effective Date") of this Agreement shall be the date on which Koch Energy, Inc. contributes Company into Entergy-Koch, L.P. (the parent company of Company); Company will notify Contractor when such contribution occurs. In the event that Company determines that such contribution will not occur, Company shall notify Contractor of such non-occurrence, and this Agreement shall never become effective and shall be of no force or effect. Until the Effective Date, Company will continue to be a party to the Original Intermittent Services Agreement. From and after the Effective Date, the parties agree that Company will no longer be a party to the Original Intermittent Services Agreement with respect to work or services performed after the Effective Date.

3. The parties recognize and acknowledge that the execution of this Agreement does not affect in any manner the Original Intermittent Services Agreement, except as relating to Koch Gateway Pipeline Company/Gulf South Pipeline Company, LP. From and after the Effective Date, Contractor will have two Intermittent Services Agreements, one with Company as defined above and one with the "Koch entities" (other than Company as defined above) listed in the Original Intermittent Services Agreement.

EXECUTED BY THE PARTIES ON THE DATES INDICATED BELOW, BUT EFFECTIVE FOR ALL PURPOSES AS OF THE EFFECTIVE DATE AS DEFINED ABOVE:

"COMPANY"
Koch Gateway Pipeline Company/
Gulf South Pipeline Company, LP

By: _____
Printed Name: _____
Title: _____
Date: _____

"CONTRACTOR"
Miller Environmental Services, Inc.

By: John Perabo
Printed Name: JOHN PERABO
Title: RESPONSE COORDINATOR
Date: 22 JANUARY 2001

KOCH INDUSTRIES INC

LEGAL DEPARTMENT

CHARLES D. DUDLEY

December 1, 1999

Via Facsimile: 512-289-6363

Mr. Matt Dartez
Miller Environmental Services, Inc.
600 Flato Road
Corpus Christi, TX 78405

Re: Intermittent Services Agreement

Koch Energy Services Company (now known as Koch Energy, Inc.)
Koch Oil Company (now known as Koch Petroleum Group, L.P.)
Koch Refining Company, L.P. (now known as Koch Petroleum Group, L.P.)
Koch Gateway Pipeline Company
Koch Pipeline Company, L.P.

Dear Mr. Dartez:

Your company currently has in effect an Intermittent Services Agreement (herein, the "ISA") dated April 24, 1997 with the above referenced Koch companies. From time to time other affiliated Koch companies may need your services. The purpose of this letter is to propose amending the term "Company" as that term is used in the ISA, to include **Koch Operating Services Company** and **Koch Gateway Pipeline, L.P.**

Please note that Koch Oil Company and Koch Refining Company, L.P., through a consolidation and a name change, are now Koch Petroleum Group, L.P. Koch Energy Services Company through a merger is now known as Koch Energy, Inc.

Koch proposes amending the ISA to include all of the following Koch companies within the term "Company" effective as of the date of this letter.

Koch Energy, Inc.
Koch Gateway Pipeline Company
Koch Petroleum Group, L.P.
Koch Pipeline Company, L.P.
Koch Operating Services Company
Koch Gateway Pipeline, L.P.

Under this proposed amendment letter, future work/services performed by your company for any of the above referenced Koch companies will be done pursuant to the ISA dated April 24, 1997 and this amendment dated December 1, 1999.

By signing at the appropriate space below and returning this letter to our office, you agree to amend the ISA to include the above Koch companies within the term "Company" as used in the ISA.

4111 East 37th Street North • Wichita, Kansas 67220 • P.O. Box 2256 • Wichita, Kansas 67201
316/828-4707 • FAX 316/529-7727

A copy of the Exhibit C (Certificate of Insurance) reflecting this amendment has been forwarded to your insurance agency. Please ask your agent to complete the Exhibit C to evidence your current insurance coverage and the required endorsements. Under the ISA, Koch requires the above companies to be named additional insured (form CG 20 10 10 93 or CG 20 10 03 97) under the general liability and any applicable umbrella/excess liability policy. Under the workers compensation policy, Koch requires two endorsements, the alternate employer and waiver of subrogation.

If you agree with this amendment letter, please sign in the appropriate space below and return this letter to Charles D. Dudley, I.S.A. Administrator, Koch Industries, Inc., P.O. Box 2256, Bldg. T3D, Wichita, Kansas 67201, or fax it to me at (316)828-9063.

Very truly yours,

Charles D. Dudley
I.S.A. Administrator

AGREED AND ACCEPTED:
Miller Environmental Services, Inc.

By: Matt Darby
Printed Name: MATT DARBY
Title: RESPONSE COORDINATOR
Date: 12/1/99

INTERMITTENT SERVICES AGREEMENT

Date: April 24, 1997
Agreement Number: 97-00335-A01

Contractor: Miller Environmental Services, Inc.

PARTIES

1. It is hereby agreed between **Koch Energy Services Company; Koch Gateway Pipeline Company; Koch Oil Company; Koch Pipeline Company, L.P.; Koch Refining Company, L.P.** (such companies being collectively referred to hereinafter as "Company") and **Miller Environmental Services, Inc.** (such company being referred to hereinafter as "Contractor"), whose business address is **600 Flato Road, Corpus Christi, TX 78405**, that Contractor will, as an independent contractor, furnish all necessary supervision, labor, materials and equipment (other than specified labor, materials and equipment furnished by Company) and shall perform work for Company as requested by Company from time to time during the term of this agreement in conformity with the terms of this agreement.

SPECIAL CONDITIONS (if applicable):

Contractor represents and warrants that it is classified by the United States Coast Guard as a Class **[insert the appropriate Class(es): A,B,C,D, and/or E]** _____ Oil Spill Response Organization (OSRO) for **[insert the appropriate environment(s), i.e. Great Lakes, inland, rivers and canals, or oceans]** _____ environment(s) in the following geographic location(s): **[insert precise description of geographic location in which OSRO classification applies]** _____

* See Attached OSRO Document

Upon telephone notification from Company, Contractor shall respond to any spill or release of oil or hazardous substance with the personnel and equipment specified by Company. Company may identify Contractor as an Oil Spill Response Organization in any facility response plan developed pursuant to the Federal Oil Pollution Act of 1990, or any state counterpart thereto, for any facility located in the geographic location(s) identified above. Contractor shall respond hereunder at the request of Company whether or not Company has identified Contractor in the particular facility's response plan. Contractor shall notify Company of any change in Contractor's OSRO classification [e.g. suspension or revocation or changes in class level(s), operating environment(s), or geographic location(s)] as soon as possible, but in no event more than five (5) calendar days after the effective date of such change, suspension, or revocation.

Contractor shall be compensated in accordance with the attached rates marked as Exhibit "A". The rates shall include without limitation, all applicable taxes imposed by federal, state or other governments or bodies having jurisdiction.

Contractor shall be compensated in accordance with the attached rates marked as Exhibit "A". The rates shall include without limitation, all applicable taxes imposed by federal, state or other governments or bodies having jurisdiction.

BILLING AND PAYMENT

2. Contractor shall submit to Company's authorized representatives an itemized statement detailing charges for labor and equipment including hours, dates, the hourly charge for the labor or equipment and any charge for materials at the end of each month during which work is performed. Contractor shall furnish upon demand any records relating to the statement prior to or after payment by Company.

3. Payment shall be made within thirty (30) days of Company's receipt of the statement described in Paragraph 2 of this agreement. Company reserves the right to withhold payment until completion of the work and its acceptance by Company or until Contractor furnishes proof satisfactory to Company that all bills for materials and labor covering the work have been fully paid by Contractor, and that the premises upon which the work is done and any structures built, improved or added to are not subject to any material or labor liens or claims of liens. Final payment shall be made within thirty (30) days of the date of acceptance of the work by Company. Contractor and/or any subcontractor shall promptly and satisfactorily settle all liens and claims for labor performed and supplies or material furnished in connection with the work; and in the event Contractor fails or refuses to promptly and satisfactorily settle any such liens or claims, Company shall, after notifying Contractor in writing, have the right to settle such claims for the account of Contractor and deduct the amount thereof from amounts payable to Contractor. Payments made under this agreement shall not constitute full or partial acceptance of the work or any part of the work by Company.

PERFORMANCE OF WORK

4. Contractor shall rely solely upon Contractor's own examination and investigation of the surface and subsurface conditions at the site, and all local and general conditions that may affect performance of the work.

5. Unless otherwise specified, Contractor shall secure all permits and licenses necessary to the performance of the work, shall pay all fees and make all deposits pertaining thereto, and shall at Contractor's expense furnish all bonds required to perform the work, and shall submit proof thereof to Company.

6. Contractor shall perform the work:
   a. In a workmanlike manner using qualified, efficient and careful workers;
   b. In accord with all plans, drawings and specifications;
   c. In compliance with all applicable federal, state, local and Company's safety rules and regulations;
   d. In a manner to protect the work, the environment, Company's property and the property and persons of others from loss, damage or injury of any type;
   e. So as not to interfere with the operations of others on the premises; and,
   f. Under the supervision of an employee of Contractor.

An employee supplied by Contractor without supervision by Contractor and who is under the exclusive direction and control of Company shall be considered a borrowed servant. In all other cases, the employee shall be considered an employee of Contractor as an independent contractor. Contractor's duties to defend, indemnify, protect and hold harmless Company under Paragraph 12 of this agreement shall continue regardless of the characterization of an employee as a borrowed servant or the employee of an independent contractor.

7. Company may maintain such representatives as it deems necessary on the work site for the purpose of inspecting, testing and ensuring the satisfactory completion of the work. Company may inspect the work at any time during the progress of the work, and Contractor shall provide reasonable facilities for such inspection. If any applicable statute, regulation or order requires any part of the work to be specially tested or approved, Contractor shall give Company reasonable notice of the time and place of such testing and inspection. Company may require Contractor to correct defective work or Company may have the work corrected by others, and, in either event, Contractor shall bear the cost of such correction.

8. Unless otherwise specified, all materials shall be new and workmanship shall be of good quality. No substitutions of materials from that specified in the plans and specifications in this agreement shall be permitted unless approval is given by Company in writing.

9. Contractor guarantees the work to be performed hereunder against defects in workmanship and material that shall appear within one year following final acceptance of the work by Company, and Contractor shall promptly remedy all such defects. Contractor shall arrange for the extensions, to Company, of all additional warranties by suppliers of goods or services that are consistent with or extend or expand the terms of the above-described warranty of Contractor.

10. Contractor and its employees, agents and subcontractors shall comply with all applicable laws, regulations, ordinances and other rules of federal, state and local government and political subdivisions, and of any other duly constituted authority having jurisdiction.

11. Contractor shall be responsible for, and hereby assumes all liability, whether insured or self-insured, for loss or destruction of, or physical damage to the following:

a. All tools, machinery, equipment and appliances that are owned by Contractor or loaned to or leased by Contractor by others than Company and that are not to be incorporated into the completed work; and,

b. All personal property of Contractor's employees; whether or not such loss, destruction or damage is caused by, arises out of, or is in any way connected with the negligence of Company, its employees or agents.

INDEMNITY

12. To the fullest extent permitted by law, Contractor shall defend, protect, indemnify and save Company, its parent company, partners, subsidiaries and any other related or affiliated entities, and their respective officers, directors and employees (collectively referred to for purposes of this Paragraph 12 as "Indemnitees") harmless from and against all claims, demands, lawsuits, causes of action, strict liability claims, penalties, fines, administrative law actions and orders, expenses (including, but not limited to, attorneys' fees) and costs of every kind and character arising out of or in any way incident to any of the work performed by Contractor, its subcontractors or the employees of either, on account of personal injuries, death, damage to property, damage to the environment, or infringement of any patent,

trademark, copyright or other property right, regardless of whether such harm is to Contractor, Indemnitees, the employees or officers of either or any other person or entity. The duty to defend, protect, indemnify and save Indemnitees harmless referred to in the preceding sentence shall include, but not be limited to, claims, demands, lawsuits, strict liability claims, penalties, fines, administrative law actions and orders, costs, expenses and causes of action that result from the comparative, concurrent or contributing negligence of any person or entity including, but not limited to, Indemnitees, their agents, employees or officers, except Contractor shall not be liable under this Paragraph 12 for loss or damage resulting from the sole (100%) negligence of Indemnitees. To the fullest extent permitted by law, Contractor further agrees to indemnify, defend and hold Indemnitees harmless against the payment of any and all taxes, penalties, fines, interest, liens or indebtedness or claims against Indemnitees' property or for work performed, or measured by the work performed, growing out of or incident to Contractor's operations under this agreement including, but not limited to, taxes, penalties, fines, interest, liens or encumbrances that result from the concurrent or contributing negligence of any person or entity, which may include indemnitees, their agents, employees or officers. Contractor shall maintain at its own cost and expense insurance covering this indemnity provision.

If and to the extent that Section 623.015 of the Texas Transportation Code applies to work performed under this agreement by Contractor, its subcontractors or the employees of either, the above indemnity provision shall only apply to the extent permitted by such statute.

INSURANCE

13. In addition to any other insurance that Contractor shall acquire under this agreement, Contractor shall maintain at its own cost and expense such insurance of the types and in the amounts as required by Company to insure all of Contractor's obligations under this agreement and that will protect Company from all claims for damages to persons and to property that may arise from any operations under this agreement or any subcontracts related to this agreement. Contractor shall maintain during the entire term of this agreement insurance policies within minimum limits of coverage all as set forth on Exhibit B, which is made a part hereof by reference. Prior to commencing work, Contractor shall require its insurer or insurance agent to supply Company a certificate of insurance in the form as set forth on Exhibit C. Such insurance shall name Company as an additional insured in accordance with the requirements of Exhibit B, with such additional insured endorsements providing coverage for Company with respect to liability arising out of Contractor's work performed for Company (including, but not limited to, liability caused or contributed to by the negligence of Contractor, its subcontractors, Company, third parties, or the agents, employees, or officers of any of them). The insurance coverages to be provided by Contractor under this paragraph, including but not limited to the additional insured coverage provided to Company, shall be independent of the indemnity provisions of this agreement, and are not designed solely to guarantee payment of Contractor's indemnity obligations.

GENERAL PROVISIONS

14. This agreement may not be assigned in whole or in part by Contractor without the prior written consent of Company, nor shall work under the contract be assigned to a subcontractor without the prior written consent of Company.

15. No amendment to this agreement shall be valid unless made in writing and signed by authorized representatives of both parties.

16. Company's right to require strict performance of Contractor's obligations shall not be affected in any way by prior waiver, forbearance or other course of dealing.

17. This agreement and any subsequent amendments comprise the entire agreement between Company and Contractor, and there are no agreements, understandings, conditions, or representations, oral or written, expressed or implied, that are not merged into this agreement or superseded by it.

18. Subject to any restrictions imposed by applicable laws, if Contractor has a petition in bankruptcy filed by or against it, has a receiver appointed for it, becomes insolvent, makes a general assignment for the benefit of creditors, refuses or fails to supply competent supervision or enough properly skilled people or proper material, disregards laws, rules or regulations applicable to the work, or otherwise violates any provision of this agreement, then Company shall have the right (in addition to any other rights it may have at law or in equity) to treat such as a breach of this agreement and may, upon the giving of written notice, terminate this agreement, terminate employment of Contractor, and take possession of the premises, all materials, tools, equipment, supplies, and appliances of any type and finish the work by whatever method Company may deem appropriate.

19. Company may require Contractor to furnish a surety bond in the full amount of and guaranteeing faithful performance of this agreement, or otherwise guaranteeing Contractor's obligations under this agreement. Such bond(s) shall be written on a form prescribed or approved by Company and shall be purchased from a source approved by Company.

20. Company shall have the right, at any reasonable time and from time to time, to audit any and all records, documents and other data pertaining to this agreement. Contractor shall cooperate in furnishing to Company all such records, documents and other data in connection with any such audit.

21. Company does not guarantee an offer of work to Contractor during the term of this agreement. Company and Contractor agree, however, that any work offered by Company to Contractor and accepted by Contractor during the term of this agreement will be performed under the terms of this agreement. Company shall not be liable in damages or otherwise, if by reason of an act of God or public enemy, strike, lockout, boycott, picketing, riot, insurrection, fire, or any governmental order, rule, or regulation, or any ordinance Company shall be delayed in, or prevented from, furnishing any materials, equipment, facilities, services, etc., required to be furnished by it hereunder.

22. Contractor shall comply with and be subject to the most recent Substance Abuse Policy issued by Koch Industries, Inc. All employees of Contractor shall be subject to drug testing when on the premises of Company. In addition to the foregoing requirements, should Contractor perform services related to facilities regulated by the United States Department of Transportation, Contractor shall have developed and implemented, or have contracted with an organization that has developed and implemented, substance abuse policies in compliance with 41 U.S.C. 701, et seq., 49 C.F.R. Part 199 and 49 C.F.R. Part 40, if applicable; and, with respect to equal employment opportunity and affirmative action compliance, Contractor shall comply with the provisions of Section 202 of Executive Order 11246 and the rules and regulations issued pursuant to Section 201 thereof. Contractor shall provide Company with documentation demonstrating compliance with such laws upon the request of Company.

23. Contractor warrants and represents that, to the extent applicable to any activities that may be performed pursuant to this agreement by Contractor or its subcontractors, all of Contractor's employees and its subcontractors' employees have received all safety training required by law for employees working in an environment in which they may come in contact with crude oil, natural gas, natural gas liquids, refined products or hazardous materials. Contractor agrees to permit Company to inspect Contractor's records in order to assure compliance with this Paragraph 23.

24. In the event any provision herein shall be judicially interpreted or held to be void or otherwise unenforceable as written, such provision shall be deemed to be revised and modified to the extent necessary to make it legally enforceable. In any event, the remaining terms of the agreement shall be enforceable as though the void or unenforceable provision did not exist.

TERM

25. This agreement shall be effective as of the date above written and shall continue for a one-year period following that date. At the end of the initial one-year period the agreement shall continue until replaced by a subsequent agreement or otherwise revoked by written notice by either party.

So agreed on the date below written.

COMPANY
Koch Energy Services Company;
Koch Gateway Pipeline Company;
Koch Oil Company;
Koch Pipeline Company, L.P.;
Koch Refining Company, L.P.

By _____

Title _____

Date _____

COMPANY'S WITNESS

By _____

Date _____

CONTRACTOR
Miller Environmental Services, Inc.

By Charles M. H

Title PRESIDENT

Date 4/25/97

CONTRACTOR'S WITNESS

By _____

Date _____

KCM 4-25-97

Exhibit B
Insurance Requirements
Supplement to Intermittent Services Agreement
Agreement Number: 97-00335-A01

1.0 With respect to Contractor's performance of the agreement to which this exhibit is attached (referred to hereinafter as the "agreement"), Contractor shall maintain the following insurance:

1.1 **Worker's Compensation and Employers' Liability Insurance**, as prescribed by applicable laws, including insurance covering liability under the Longshoremen's and Harbor Workers' Compensation Act, the Jones Act (Merchant Marine Act of 1920 (Jones Act) and the Outer Continental Shelf Land Act, if applicable. Coverage will include an Alternate Employer Endorsement (WC 00 03 01) naming Company as an Alternate Employer.

1.2 **Commercial General Liability Insurance**, which shall be no less comprehensive and no more restrictive than the coverage provided by a standard form Commercial General Liability Policy ISO CG 00 01 11 88, CG 00 01 10 93, or CG 00 01 01 96 with standard exclusions "a" through "n", with a minimum combined single limit of $3,000,000 per occurrence for Bodily Injury and Property Damage and a $3,000,000 aggregate each for the general policy and the Products/Completed Operations hazard. This insurance must include the following features:

1.2.1 If work to be performed by Contractor includes construction or demolition operations within 50 feet of any railroad property and affecting any railroad bridge or trestle, tracks, road-beds, tunnel, underpass or crossing, and if Contractor's commercial general liability insurance policy is form ISO CG 00 01 11 88, then such policy will include a Railroad's Contractual Liability Endorsement CG 24 17 10 93.

1.2.2 Contractual Liability coverage.

1.2.3 Products and Completed operations.

1.2.4 Coverage for demolition of any building or structure, collapse, explosion, blasting, excavation and damage to property below the surface of the ground (XCU coverage), if applicable.

1.2.6 Coverage will include Additional Insured - Owners, Lessees or Contractors (Form B) Endorsement (CG 20 10 10 93) naming Company as an additional insured.

1.3 **Automobile Liability Insurance**, covering all owned, non owned, hired and leased vehicles with a minimum combined single limit for Bodily Injury and Property Damage of $3,000,000 per accident. This insurance must include contractual liability coverage.

1.4 **Aircraft Liability Insurance** - If any operations require the use of aircraft, including helicopters, Contractor shall maintain or require owners of such aircraft to maintain Aircraft Liability Insurance with a combined single limit of not less than $5,000,000 for bodily injury and property damage (including passenger) liability.

1.5 **Hull and Machinery Insurance** covering vessels or barges owned or bareboat chartered by Contractor and used by Contractor in the performance of the agreement. Such vessels shall be insured for no less than the fair market value of such vessel or barge. Coverage shall include Collision Liability Insurance with limits no less than $5,000,000.

1.6 **Protection and Indemnity Insurance** - If marine work is to be performed under the agreement, Contractor shall maintain Protection and Indemnity Insurance, including coverage for injuries to or death of masters, mates and crews of vessels used in the performance of the agreement. The limits of liability of such insurance shall not be less than $5,000,000 per occurrence. Contractor may cover its obligation for loss of life or bodily injury to the crew of the vessel by extension of the Workers Compensation Insurance 1.1 above (Jones Act). Coverage shall also include pollution liability for loss as specified in the requirements of applicable United States Federal and State Laws. All certificates evidencing financial responsibility shall be current and carried on board.

1.7 **Railroad Protective Liability** - If required by Company, Contractor shall maintain Railroad Protective Liability insurance naming the railroad as the insured with a limit for bodily injury and property damage liability of $2,000,000 per occurrence, $6,000,000 aggregate. The original of said policy shall be furnished to railroad prior to any construction or entry upon the railroad easement premises by Contractor.

1.8 **Umbrella / Excess Insurance** - The limits specified in 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6 above may be satisfied with a combination of primary and Umbrella/Excess Insurance.

2.0 Policy Endorsements

2.1 The above insurance shall include a requirement that the insurer provide Company with thirty (30) days' written notice prior to the effective date of any cancellation or material change of the insurance.

2.2 The insurance specified in Section 1.2, 1.4, 1.5, 1.6 and 1.8 hereof shall:
(i.) name Company as an additional insured with respect to work performed for Company, with such additional insured endorsement (CG 20 10 10 93) providing coverage for Company with respect to liability arising out of Contractor's work performed for Company (including, but not limited to, liability caused or contributed to by the negligence of Contractor, its subcontractors, Company, third parties, or the agents, employees, or officers of any of them); and;
(ii.) be primary to and not in excess of or contributory with any other insurance available to Company.

3.0 Evidence of Insurance - Contractor shall, before commencing work, provide Company with a certificate (see attached Exhibit C) satisfactory to Company of the insurance coverages and endorsements set forth in Sections 1.0 and 2.0 above. If requested by Company, Contractor shall provide Company with certified copies of all policies.

4.0 Waiver of Subrogation

4.1 Contractor, on behalf of its insurers, waives any right of subrogation that such insurers may have against Company arising out of this agreement.

4.2 The insurance specified in Section 1.1 hereof shall contain a waiver of the right of subrogation against Company and an assignment of statutory lien, if applicable.

4.3 Any physical damage insurance carried by Contractor on construction equipment, tools, temporary structures and supplies owned or used by Contractor shall provide a waiver of the right of subrogation against Company.

5.0 The obligation to carry the insurance required by this Exhibit shall not limit or modify in any way any other obligations assumed by the Contractor under the agreement. Contractor shall be held accountable for all insurance coverages, including those of sub-contractors. Company shall not be under any duty to advise Contractor in the event that Contractor's insurance is not in compliance with this agreement. ACCEPTANCE OF ANY INSURANCE CERTIFICATE SHALL NOT CONSTITUTE ACCEPTANCE OF THE ADEQUACY OF COVERAGE, COMPLIANCE WITH THE REQUIREMENTS OF THE AGREEMENT, OR AN AMENDMENT TO THE AGREEMENT.

TECHNICAL RESPONSE PLANNING
CORPORATION

1995 ✧ 2005
10 YEARS OF EXCELLENCE

October 30, 2006

L. E. Herrick
Response Plans Officer
U.S. DOT Office of Pipeline Safety
400 Seventh Street, S.W., Room 2103
Washington, D.C. 20590

RE: RSPA Sequence Number xxx - Austin Zone Spill Response Plan
RSPA Sequence Number xxx - Bastrop Zone Spill Response Plan
RSPA Sequence Number xxx - Fort Worth Zone Spill Response Plan
RSPA Sequence Number xxx - San Antonio Zone Spill Response Plan
RSPA Sequence Number xxx - Waco Zone Spill Response Plan

Dear L. E. Herrick:

In response to the letter dated December 13, 2005 from your office, Flint Hills Resources, L.P. (FHR) is respectfully submitting two enclosed copies of the above referenced 49 CFR Part 194, Response Plans for Onshore Transportation-Related Facilities for your review and approval.

Previously Koch Pipeline Co. L.P. (KPL) and FHR submitted a joint Integrated Contingency Plan (ICP) to your office for review and approval. KPL and FHR are now submitting separate response plans due to the development of an electronic plan format. There will need to be new OPS sequence numbers assigned to the five plans included in this submittal. There were several findings in your letter regarding uncertainties with the joint response plans and cross-reference errors. The electronic plan has addressed the cross-reference errors and the separate plans address the uncertainties. The OPS sequence numbers (452, 453, 639, 641, and 642) have been deleted from our response plan. The TGLO map finding is no longer an issue as all maps are in electronic format.

The summary of review findings has been addressed in this submission. The plan includes a cross reference that will allow you to aid in the review of the plan and ensure we have met all required components. In addition we have attached a reference of the plan items and the section in which they are addressed.

If you have any questions regarding the enclosed FHR Plans, please contact Deb Haifleigh, Pipeline Safety Compliance System Owner, at (316) 828-5808.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Gregory Desmond
Senior Project Manager

Enclosures
Federal Express

9720 Cypresswood Drive # 340 · Houston, Texas 77070 · Office: (281) 955-9600 · Fax: (281) 955-0369 · E-mail: info@trpcorp.com · Internet: www.trpcorp.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

√3

January 21, 2000

Certified Mail Receipt No: Z 187 276 051

PAT MULLINS
KOCH REFINING CO.
498 POP GUNN DRIVE
SAN ANTONIO, TX 78219

RE: SAN ANTONIO TERMINAL; FRP-06-TX-00400

Dear Qualified Individual:

This letter is to notify you that the United States Environmental Protection Agency (EPA) has approved your Facility Response Plan. All appropriate liability requirements set forth in the Clean Water Act (CWA) 311(j)(5), as amended by the Oil Pollution Act of 1990 are still applicable. This regulatory approval was based upon technical review of the plan submissions. Please be advised that EPA will continue to monitor your facility's approval status through site inspections and information validation.

If EPA determines during its next review, or during field verification, that the response plan is inadequate, or if EPA acquires information which indicates your response plan is inadequate to manage potential discharges, EPA will require appropriate revisions to your plan. Failure to make such revisions may affect your plan's approved status.

If you have any questions concerning this letter, please contact my office at 214-245-1134.

Sincerely,

Donald P. Smith

Donald P. Smith
Senior On-Scene Coordinator (6SF-RP)

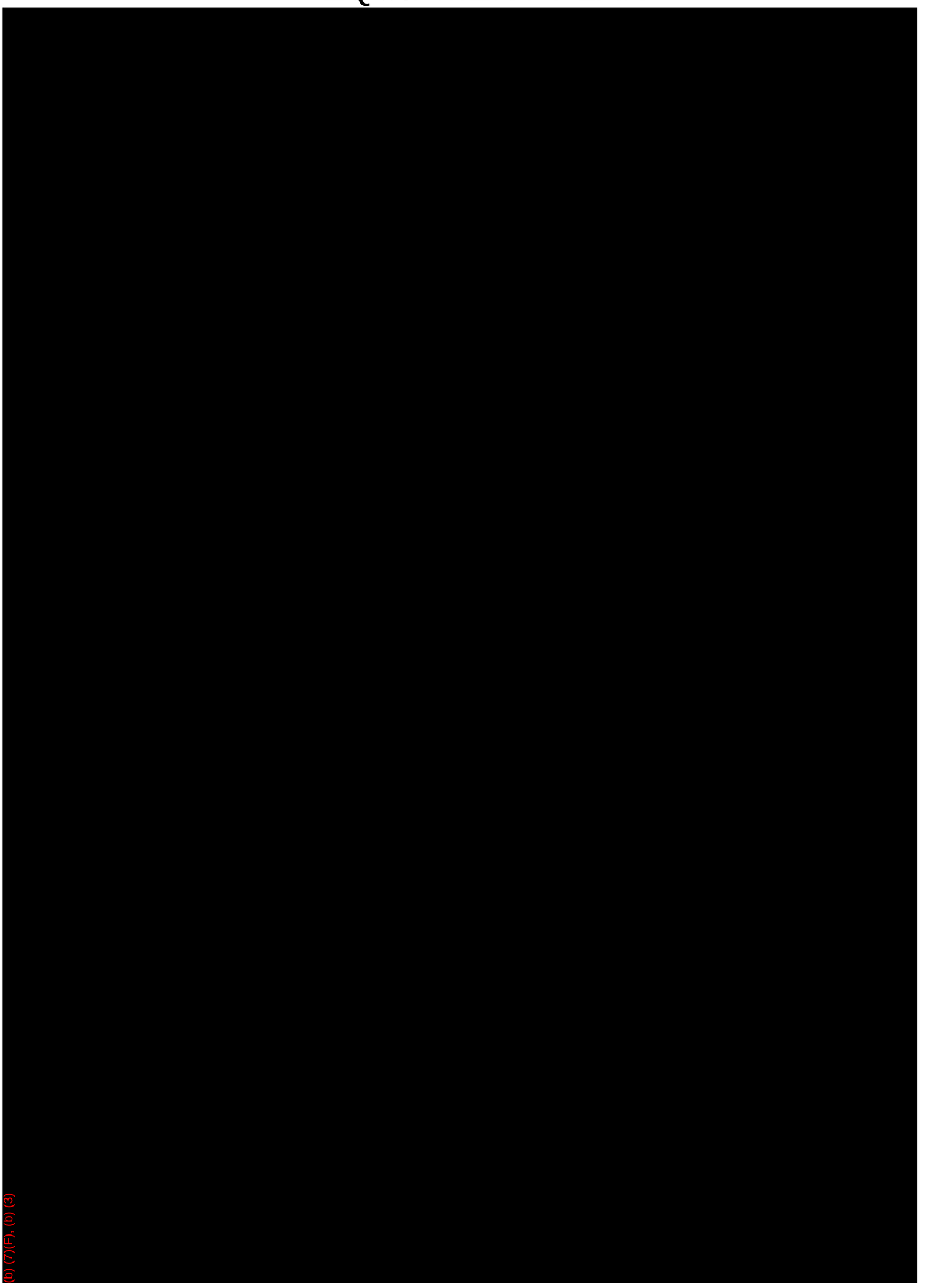
(b) (7)(F), (b) (3)

[redacted]

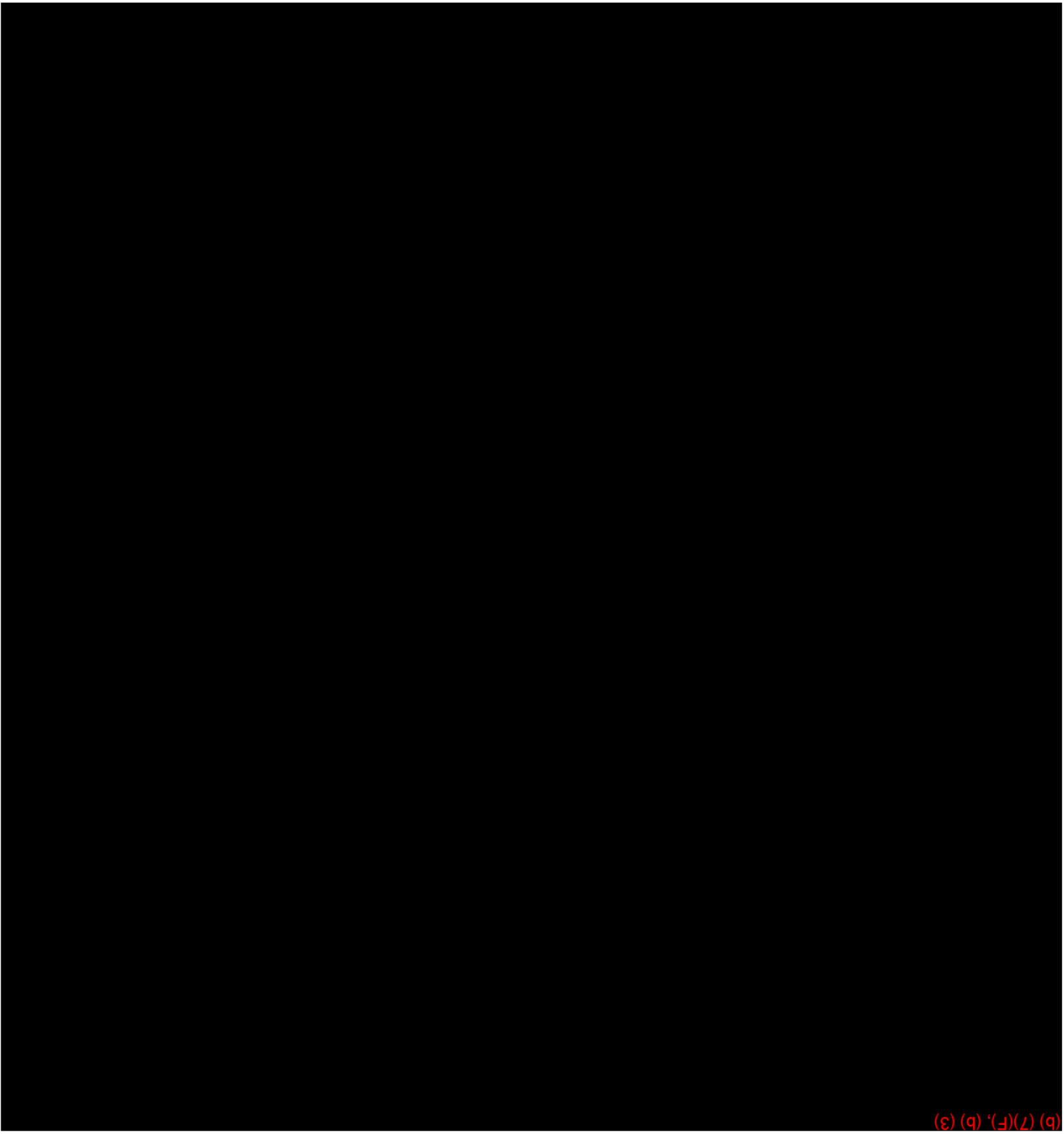
DRAINAGE PLAN

SAN ANTONIO TERMINAL

SAN ANTONIO TERMINAL
EMERGENCY EVACUATION & FIRE EQUIPMENT PLAN



SAN ANTONIO TERMINAL
EMERGENCY EVACUATION & FIRE EQUIPMENT PLAN



(b) (7)(F), (b) (3)

INTERMITTENT SERVICES AGREEMENT

Date: June 13, 2005
Agreement Number: 0500279-A

Contractor: TAS Environmental Services, L.P.

PARTIES
It is hereby agreed between:

(i) Flint Hills Resources, L.P. Koch Pipeline Company, L.P., (such company or companies being collectively referred to hereinafter as "Company"), whose business address is P.O. Box 2256, Wichita, Kansas 67201, and

(ii) TAS Environmental Services, L.P. (such company being referred to hereinafter as "Contractor"), whose business address is 3929 California Parkway, Ft. Worth, TX 76119,

that Contractor will, as an independent contractor, furnish all necessary supervision, labor, materials and equipment (other than specified labor, materials and equipment furnished by Company) and shall perform work for Company as requested by Company from time to time during the term of this agreement in conformity with the terms of this agreement.

SPECIAL CONDITIONS:

1. Contractor represents and warrants that it is classified by the United States Coast Guard as a Class: A,B,C,D, and/or E <Applied For>_____ Oil Spill Response Organization (OSRO) for i.e. Great Lakes, inland, rivers and canals, or oceans <Applied For>_____ environment(s) in the following geographic location(s) Fort Worth, TX, San Antonio, TX, Dallas, TX, Austin, TX. Attached hereto as Schedule 1 is a copy of Contractor's current OSRO Classification Letter. If Contractor is not OSRO classified, attach a complete list and description of all response equipment, personnel and training that will be maintained and made available by Contractor during the term of this agreement.

Upon telephone notification from Company, Contractor shall respond to any spill or release of oil or hazardous substance with the personnel and equipment specified by Company. Company may identify Contractor as an Oil Spill Response Organization in any facility response plan developed pursuant to the Federal Oil Pollution Act of 1990, or any state counterpart thereto, for any facility located in the geographic location(s) identified above. Contractor shall respond hereunder at the request of Company whether or not Company has identified Contractor in the particular facility's response plan. Contractor shall notify Company of any change in Contractor's OSRO classification [e.g. suspension or revocation or changes in class level(s), operating environment(s), or geographic location(s)] as soon as possible, but in no event more than five (5) calendar days after the effective date of such change, suspension, or revocation. If Contractor is not ORSO classified, Contractor shall notify Company within five (5) calendar days of any material change in response equipment or personnel availability and shall provide Company with an updated list and description of such resources.

Contractor shall comply with all Federal, State and local laws, rules and regulations, including but not limited to all rules and regulations promulgated and in force pursuant to the Occupational, Safety and Health Act and all HazCom, HazMat, and HazWoper requirements set forth therein. Contractor shall be solely responsible for ensuring its employees have received all certifications and training required by the Occupational, Safety and Health Act, and any and all other applicable Federal, State or local laws, rules or regulations.

Contractor shall be compensated in accordance with the attached rates marked as "Exhibit A". In the event of a conflict between the provisions contained within the main body of this agreement and a provision contained within Exhibit A, the provisions in the main body of this agreement shall control. The rates shall include, without limitation, all applicable taxes imposed by federal, state or other governments or bodies having jurisdiction.

BILLING AND PAYMENT

2. Contractor shall submit to Company's authorized representatives an itemized statement detailing charges for labor and equipment including hours, dates, the hourly charge for the labor or equipment and any charge for materials at the end of each month during which work is performed. Contractor shall furnish upon demand any records relating to the statement prior to or after payment by Company. If "Company", as defined above, includes more then one entity, Contractor agrees that each such entity will be separately, not jointly, responsible for the payment obligations hereunder as relating to work performed for such entity.

3. Payment shall be made within thirty (30) days of Company's receipt of the statement described in Paragraph 2 of this agreement. Company reserves the right to withhold payment until completion of the work and its acceptance by Company or until Contractor furnishes proof satisfactory to Company that all bills for materials and labor covering the work have been fully paid by Contractor, and that the premises upon which the work is done and any structures built, improved or added to are not subject to any material or labor liens or claims of liens. Final payment shall be made within thirty (30) days of the date of acceptance of the work by Company. Contractor and/or any subcontractor shall promptly and satisfactorily settle all liens and claims for labor performed and supplies or material furnished in connection with the work; and in the event Contractor fails or refuses to promptly and satisfactorily settle any such liens or claims, Company shall, after notifying Contractor in writing, have the right to settle such claims for the account of Contractor and deduct the amount thereof from amounts payable to Contractor. Payments made under this agreement shall not constitute full or partial acceptance of the work or any part of the work by Company.

PERFORMANCE OF WORK

4. Contractor shall rely solely upon Contractor's own examination and investigation of the surface and subsurface conditions at the site, and all local and general conditions that may affect performance of the work.

5. Unless otherwise specified, Contractor shall secure all permits and licenses necessary to the performance of the work, shall pay all fees and make all deposits pertaining thereto, and shall at Contractor's expense furnish all bonds required to perform the work, and shall submit proof thereof to Company.

6. Contractor shall perform the work:
a. In a workmanlike manner using qualified, efficient and careful workers;
b. In accord with all plans, drawings and specifications;
c. In compliance with all applicable federal, state, local and Company's safety rules and regulations;
d. In a manner to protect the work, the environment, Company's property and the property and persons of others from loss, damage or injury of any type;
e. So as not to interfere with the operations of others on the premises; and,
f. Under the supervision of an employee of Contractor.

An employee supplied by Contractor without supervision by Contractor and who is under the exclusive direction and control of Company shall be considered a borrowed servant. In all other cases, the employee shall be considered an employee of Contractor as an independent contractor. Contractor's duties to defend, indemnify, protect and hold harmless Company under Paragraph 12 of this agreement shall continue regardless of the characterization of an employee as a borrowed servant or the employee of an independent contractor.

7. Company may maintain such representatives as it deems necessary on the work site for the purpose of inspecting, testing and ensuring the satisfactory completion of the work. Company may inspect the work at any time during the progress of the work, and Contractor shall provide reasonable facilities for such inspection. If any applicable statute, regulation or order requires any part of the work to be specially tested or approved, Contractor shall give Company reasonable notice of the time and place of such testing and inspection. Company may require Contractor to correct defective work or Company may have the work corrected by others, and, in either event, Contractor shall bear the cost of such correction.

8. Unless otherwise specified, all materials shall be new and workmanship shall be of good quality. No substitutions of materials from that specified in the plans and specifications in this agreement shall be permitted unless approval is given by Company in writing.

9. Contractor guarantees the work to be performed hereunder against defects in workmanship and material that shall appear within one year following final acceptance of the work by Company, and Contractor shall promptly remedy all such defects. Contractor shall arrange for the extensions, to Company, of all additional warranties by suppliers of goods or services that are consistent with or extend or expand the terms of the above described warranty of Contractor.

10. Contractor and its employees, agents and subcontractors shall comply with all applicable laws, regulations, ordinances and other rules of federal, state and local government and political subdivisions, and of any other duly constituted authority having jurisdiction.

11. Contractor shall be responsible for, and hereby assumes all liability, whether insured or self-insured, for loss or destruction of or physical damage to the following: All tools, machinery, equipment and appliances that are owned by Contractor or loaned to or leased by Contractor by others than Company and that are not to be incorporated into the completed work; and, all personal property of Contractor's employees, whether or not such loss, destruction or damage is caused by, arises out of, or is in any way connected with the negligence of Company, its employees or agents.

INDEMNITY

12. TO THE FULLEST EXTENT PERMITTED BY LAW, CONTRACTOR SHALL DEFEND, PROTECT, INDEMNIFY AND SAVE COMPANY, ITS PARENT COMPANY, PARTNERS, SUBSIDIARIES AND ANY OTHER RELATED OR AFFILIATED ENTITIES, AND THEIR RESPECTIVE OFFICERS, DIRECTORS AND EMPLOYEES (COLLECTIVELY REFERRED TO FOR PURPOSES OF THIS PARAGRAPH 12 AS "INDEMNITEES") HARMLESS FROM AND AGAINST ALL CLAIMS, LIABILITIES, DAMAGES, DEMANDS, LAWSUITS, CAUSES OF ACTION, STRICT LIABILITY CLAIMS, PENALTIES, FINES, ADMINISTRATIVE LAW ACTIONS AND ORDERS, EXPENSES (INCLUDING, BUT NOT LIMITED TO, ATTORNEYS' FEES) AND COSTS OF EVERY KIND AND CHARACTER (COLLECTIVELY "CLAIMS/LIABILITIES") ARISING OUT OF OR IN ANY WAY INCIDENT TO ANY OF THE WORK PERFORMED BY CONTRACTOR, ITS SUBCONTRACTORS OR THE

EMPLOYEES OF EITHER, ON ACCOUNT OF PERSONAL INJURIES, DEATH, DAMAGE TO PROPERTY, DAMAGE TO THE ENVIRONMENT, OR INFRINGEMENT OF ANY PATENT, TRADEMARK, COPYRIGHT OR OTHER PROPERTY RIGHT, REGARDLESS OF WHETHER SUCH HARM IS TO CONTRACTOR, INDEMNITEES, THE EMPLOYEES OR OFFICERS OF EITHER OR ANY OTHER PERSON OR ENTITY. THE DUTY TO DEFEND, PROTECT, INDEMNIFY AND SAVE INDEMNITEES HARMLESS REFERRED TO IN THE PRECEDING SENTENCE SHALL INCLUDE, BUT NOT BE LIMITED TO, CLAIMS/LIABILITIES THAT RESULT FROM THE COMPARATIVE, CONCURRENT OR CONTRIBUTING NEGLIGENCE OF ANY PERSON OR ENTITY INCLUDING, BUT NOT LIMITED TO, INDEMNITEES OR THEIR AGENTS, EXCEPT CONTRACTOR SHALL NOT BE LIABLE UNDER THIS PARAGRAPH 12 FOR LOSS OR DAMAGE RESULTING FROM THE SOLE (100%) NEGLIGENCE OF INDEMNITEES. TO THE FULLEST EXTENT PERMITTED BY LAW, CONTRACTOR FURTHER AGREES TO INDEMNIFY, DEFEND AND HOLD INDEMNITEES HARMLESS AGAINST THE PAYMENT OF ANY AND ALL TAXES, PENALTIES, FINES, INTEREST, LIENS OR INDEBTEDNESS OR CLAIMS AGAINST INDEMNITEES' PROPERTY OR FOR WORK PERFORMED, OR MEASURED BY THE WORK PERFORMED, GROWING OUT OF OR INCIDENT TO CONTRACTOR'S OPERATIONS UNDER THIS AGREEMENT INCLUDING, BUT NOT LIMITED TO, TAXES, PENALTIES, FINES, INTEREST, LIENS OR ENCUMBRANCES THAT RESULT FROM THE CONCURRENT OR CONTRIBUTING NEGLIGENCE OF ANY PERSON OR ENTITY, WHICH MAY INCLUDE INDEMNITEES, THEIR AGENTS, EMPLOYEES OR OFFICERS. CONTRACTOR SHALL MAINTAIN AT ITS OWN COST AND EXPENSE INSURANCE COVERING THIS INDEMNITY PROVISION. CONTRACTOR'S DUTIES UNDER THIS PARAGRAPH SURVIVE THE TERMINATION, REVOCATION, OR EXPIRATION OF THIS AGREEMENT.

INSURANCE

13. In addition to any other insurance that Contractor shall acquire under this agreement, Contractor shall maintain at its own cost and expense such insurance of the types and in the amounts as required by Company to insure all of Contractor's obligations under this agreement and that will protect Company from all claims for damages to persons and to property that may arise from any operations under this agreement or any subcontracts related to this agreement. Contractor shall maintain during the entire term of this agreement insurance policies within minimum limits of coverage all as set forth on Exhibit B, which is made a part hereof by reference. Prior to commencing work, Contractor shall require its insurer or insurance agent to supply Company a certificate of insurance in the form as set forth on Exhibit C. Such insurance shall name Company as an additional insured in accordance with the requirements of Exhibit B, with such additional insured endorsements providing coverage for Company with respect to liability arising out of Contractor's work performed for Company (including, but not limited to, liability caused or contributed to by the negligence of Contractor, its subcontractors, Company, third parties, or the agents, employees, or officers of any of them). All self-insured retentions ("SIRs") and deductibles shall be the responsibility of and to the account of Contractor; Contractor agrees that such insurance shall not be subject to any SIRs unless specifically consented to in writing by Company. The insurance coverages to be provided by Contractor under this paragraph, including but not limited to the additional insured coverage provided to Company, shall be independent of the indemnity provisions of this agreement, and are not designed solely to guarantee payment of Contractor's indemnity obligations.

GENERAL PROVISIONS

14. This agreement may not be assigned in whole or in part by Contractor without the prior written consent of Company, nor shall work under the contract be assigned to a subcontractor without the prior written consent of Company.

15. No amendment to this agreement shall be valid unless made in writing and signed by authorized representatives of both parties.

16. Company's right to require strict performance of Contractor's obligations shall not be affected in any way by prior waiver, forbearance or other course of dealing.

17. This agreement and any subsequent amendments comprise the entire agreement between Company and Contractor with respect to the subject matter hereof, and there are no agreements, understandings, conditions, or representations, oral or written, expressed or implied, that are not merged into this agreement or superseded by it.

18. Subject to any restrictions imposed by applicable laws, if Contractor has a petition in bankruptcy filed by or against it, has a receiver appointed for it, becomes insolvent, makes a general assignment for the benefit of creditors, refuses or fails to supply competent supervision or enough properly skilled people or proper material, disregards laws, rules or regulations applicable to the work, or otherwise violates any provision of this agreement, then Company shall have the right (in addition to any other rights it may have at law or in equity) to treat such as a breach of this agreement and may upon the giving of written notice terminate this agreement, terminate employment of Contractor, and take possession of the premises, all materials, tools, equipment, supplies, and appliances of any type and finish the work by whatever method Company may deem appropriate.

19. Company may require Contractor to furnish a surety bond in the full amount of and guaranteeing faithful performance of this agreement, or otherwise guaranteeing Contractor's obligations under this agreement. Such bond(s) shall be written on a form prescribed or approved by Company and shall be purchased from a source approved by Company.

20. Company shall have the right, at any reasonable time and from time to time, to audit any and all records, documents and other data pertaining to this agreement. Contractor shall cooperate in furnishing to Company all such records, documents and other data in connection with any such audit.

21. Company does not guarantee an offer of work to Contractor during the term of this agreement. Company and Contractor agree, however, that any work offered by Company to Contractor and accepted by Contractor during the term of this agreement will be performed under the terms of this agreement. Company shall not be liable in damages or otherwise, if by reason of an

act of God or public enemy, strike, lockout, boycott, picketing, riot, insurrection, fire, or any governmental order, rule, or regulation, or any ordinance Company shall be delayed in, or prevented from, furnishing any materials, equipment, facilities, services, etc., required to be furnished by it hereunder.

22. Contractor shall comply with and be subject to the most recent Substance Abuse Policy issued by Koch Industries, Inc. All employees of Contractor shall be subject to drug testing when on the premises of Company. In addition to the foregoing requirements, should Contractor perform services related to facilities regulated by the United States Department of Transportation, Contractor shall have developed and implemented, or have contracted with an organization that has developed and implemented, substance abuse policies in compliance with 41 U.S.C. 701, et seq., 49 C.F.R. Part 199 and 49 C.F.R. Part 40, if applicable; and, with respect to equal employment opportunity and affirmative action compliance, Contractor shall comply with the provisions of Section 202 of Executive Order 11246 and the rules and regulations issued pursuant to Section 201 thereof. Contractor shall provide Company with documentation demonstrating compliance with such laws upon the request of Company.

23. Contractor warrants and represents that, to the extent applicable to any activities that may be performed pursuant to this agreement by Contractor or its subcontractors, all of Contractor's employees and its subcontractors' employees have received all safety training required by law for employees working in an environment in which they may come in contact with crude oil, natural gas, natural gas liquids, refined products or hazardous materials. Contractor agrees to permit Company to inspect Contractor's records in order to assure compliance with this Paragraph 23.

24. In the event any provision herein shall be judicially interpreted or held to be void or otherwise unenforceable as written, such provision shall be deemed to be revised and modified to the extent necessary to make it legally enforceable. In any event, the remaining terms of the agreement shall be enforceable as though the void or unenforceable provision did not exist.

CONFIDENTIALITY

25. All information that Contractor acquires from Company hereunder, directly or indirectly, and all information that arises out of the Work performed hereunder, concerning such Work and/or proprietary processes involved in the Work, including without limitation, information concerning Company's current and future business plans, information relating to Company's operations, and other Company-furnished information and know-how relating to the Work shall be deemed Company's "Proprietary Information." Company's Proprietary Information shall be held in strictest confidence by Contractor and shall be used solely for purposes of performing such Services. The obligations under this Paragraph shall survive completion of such work/services and termination of this Agreement.

TERM

26. This agreement shall be effective as of the date first above written and shall continue for a one-year period following that date. At the end of the initial one-year period, the agreement shall continue until replaced by a subsequent agreement or otherwise revoked by written notice by either party.

SO AGREED, EXECUTED ON THE DATES INDICATED BELOW, BUT EFFECTIVE AS OF THE DATE FIRST ABOVE WRITTEN:

COMPANY
Flint Hills Resources, LP
Koch Pipeline Company, L.P.

By Bob O'Hair
Bob O'Hair
(Printed Name)
Title Vice President
Date 6-22-05

CONTRACTOR
TAS Environmental Services, L.P.

Federal ID Number: 20-1454928

By
J Salter
(Printed Name)
Title President of GP
Date 6.13.5

Exhibit B
Insurance Requirements
Supplement to Intermittent Services Agreement 0500279-A

1.0 With respect to Contractor's performance of the agreement to which this exhibit is attached (referred to hereinafter as the "agreement"), Contractor shall maintain the following insurance:

1.1 **Worker's Compensation and Employers' Liability Insurance**, as prescribed by applicable law including insurance covering liability under the Longshoremen's and Harbor Workers' Compensation Act, the Merchant Marine Act of 1920 (Jones Act) and the Outer Continental Shelf Land Act, if applicable. Coverage will include an Alternate Employer Endorsement (WC 00 03 01) naming Company as an Alternate Employer. Contractor shall require its insurer or insurance agent to provide, as requested by Company, Contractor's Experience Modification Rating (EMR).

1.2 **Commercial General Liability Insurance**, which shall be at least as broad as the coverage provided by a standard form Commercial General Liability Policy (ISO CG 00 01 01 96, with standard exclusions "a" through "n"; ISO forms CG 00 01 07 98 or CG 00 01 10 01, with standard exclusions "a" through "o", with a minimum combined single limit of **$3,000,000** per occurrence for Bodily injury and Property Damage and a **$3,000,000** aggregate each for the general policy and the Products/Completed Operations hazard. This insurance must include the following features:

1.2.1 If work to be performed by Contractor includes construction or demolition operations within 50 feet of any railroad property and affecting any railroad bridge or trestle, tracks, road-beds, tunnel, underpass or crossing, and if Contractor's commercial general liability insurance policy is form ISO CG 00 01 11 88, then such policy will include a Railroad's Contractual Liability Endorsement CG 24 17 10 93.

1.2.2 Contractual Liability coverage.

1.2.3 Products and Completed operations.

1.2.4 Coverage for demolition of any building or structure, collapse, explosion, blasting, excavation and damage to property below the surface of the ground (XCU coverage), if applicable.

1.2.5 Coverage will include one of the following endorsements naming Company as an additional insured:

(i) Additional Insured - Owners, Lessees or Contractors (Form B) Endorsement (CG 20 10 10 93); or
(ii) Additional Insured - Owners, Lessees or Contractors Scheduled Person or Organization Endorsement (CG 20 10 03 97); or
(iii) Additional Insured – Owners, Lessees or Contractors Scheduled Person or Organization Endorsement (CG 20 10 10 01).

1.3 **Automobile Liability Insurance**, covering all owned, non owned, hired and leased vehicles with a minimum combined single limit for Bodily Injury and Property Damage of **$3,000,000** per accident. This insurance must include contractual liability coverage.

1.4 **Aircraft Liability Insurance** - If any operations require the use of aircraft, including helicopters, Contractor shall maintain or require owners of such aircraft to maintain Aircraft Liability Insurance with a combined single limit of not less than **$5,000,000** for bodily injury and property damage (including, passenger) liability.

1.5 **Hull and Machinery Insurance** covering vessels or barges owned or bareboat chartered by Contractor and used by Contractor in the performance of the agreement. Such vessels shall be insured for no less than the fair market value of such vessel or barge. Coverage shall include **Collision Liability Insurance** with limits no less than **$5,000,000.**

1.6 **Protection and Indemnity Insurance** - If marine work is to be performed under the agreement, Contractor shall maintain Protection and Indemnity Insurance, including coverage for injuries to or death of masters, mates and crews of vessels used in the performance of the agreement. The limits of liability of such insurance shall not be less than **$5,000,000** per occurrence. Contractor may cover its obligation for loss of life or bodily injury to the crew of the vessel by extension of the Workers Compensation Insurance 1.1 above (Jones Act). Coverage shall also include pollution liability for loss as specified in the requirements of applicable United States Federal and State Laws. All certificates evidencing financial responsibility shall be current and carried on board.

1.7 **Railroad Protective Liability** - If required by Company, Contractor shall maintain Railroad Protective Liability Insurance naming the railroad as the insured with a limit for bodily injury and property damage liability of **$2,000,000** per occurrence, **$6,000,000** aggregate. The original of said policy shall be furnished to railroad prior to any construction or entry upon the railroad easement premises by Contractor.

1.8 **Umbrella / Excess Insurance** - The limits specified in 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6 above may be satisfied with a combination of primary and Umbrella/Excess Insurance, such policies naming Company as additional insured.

1.9 **Pollution Liability Insurance - If required by Company,** Contractor shall provide and maintain, and ensure that all of Contractor's subcontractors provide and maintain, the following insurances: Contractor's Pollution Liability Insurance with coverage for (a.) bodily injury, sickness, disease, mental anguish or shock sustained by any person, including death; (b.) property damage, including physical injury to or destruction of tangible property, including the resulting loss of use thereof, clean up costs, and the loss of use of tangible property that has not been physically injured or destroyed; (c.) defense, including costs, charges and expenses incurred in the investigation, adjustment or defense of claims for such compensatory damages; for losses caused by pollution conditions that arise from the operations of the Contractor performed under this Agreement. If such policy is written on a claims-made basis, the Contractor warrants that continuous coverage will be maintained, or an extended coverage period will be exercised for a period of 12 months, beginning from the time the work under this Agreement is completed. Contractor agrees to name Company as an additional insured and to furnish insurance certificates showing the Contractor's compliance with this Paragraph 1.9. Contractor also agrees to notify Company 30 days in advance of any cancellation or change to the insurance coverages shown on the certificate. Contractor shall maintain limits no less than Pollution Legal Liability: **$5,000,000 per loss** and **$5,000,000 annual aggregate.**

Note: Coverage for Contractor's Pollution Liability Insurance can be satisfied by the addition of a time element buyback endorsement on the General Liability Policy. The coverage must be as broad as the coverage described above, with a minimum requirement for discovery of 7 days and a minimum reporting period of 60 days.

Contractor shall, before commencing work, provide Company with a certificate of insurance satisfactory to Company of the insurance coverages set forth above.

2.0 **Policy Endorsements**

2.1 The above insurance shall include a requirement that the insurer provide Company with thirty (30) days' written notice prior to the effective date of any cancellation or material change of the insurance.

2.2 The insurance specified in Sections 1.2, 1.4, 1.5, 1.6, 1.8 and 1.9 hereof, as well as any Excess/Umbrella insurance coverage available to Contractor, shall:

i) Name Company as an additional insured with respect to work performed for Company, with such additional insured endorsement providing coverage for Company with respect to liability arising out of Contractor's work performed for Company (including, but not limited to, liability caused or contributed to by the negligence of Contractor, its subcontractors, Company, third parties, or the agents, employees, or officers of any of them);
ii) Be primary to and not in excess of or contributory with any other insurance available to Company; and
iii) Acknowledge that in no event shall Company's insurance, including but not limited to any SIR or deductible, be considered "other insurance" under the terms of Contractor's policies .

3.0 **Evidence of Insurance** - Contractor shall, before commencing work, provide Company with a certificate (see attached **Exhibit C**) satisfactory to Company of the insurance coverages and endorsements set forth in Sections 1.0 and 2.0 above. If requested by Company, Contractor shall provide Company with certified copies of all policies.

4.0 **Waiver of Subrogation**

4.1 Contractor, on behalf of its insurers, waives any right of subrogation that such insurers may have against Company arising out of this agreement.

4.2 The insurance specified in Section 1.1 hereof shall contain a waiver of the right of subrogation against Company and an assignment of statutory lien, if applicable.

4.3 Any physical damage insurance carried by Contractor on construction equipment, tools, temporary structures and supplies owned or used by Contractor shall provide a waiver of the right of subrogation against Company.

5.0 All self-insured retentions ("SIRs") and deductibles shall be the responsibility of and to the account of Contractor; Contractor agrees that such insurance shall not be subject to any SIRs, unless specifically consented to in writing by Company.

6.0 The obligation to carry the insurance required by this Exhibit shall not limit or modify in any way any other obligations assumed by the Contractor under the agreement. Contractor shall be held accountable for all insurance coverages, including those of sub-contractors. Company shall not be under any duty to advise Contractor in the event that Contractor's insurance is not in compliance with this agreement. ACCEPTANCE OF ANY INSURANCE CERTIFICATE SHALL NOT CONSTITUTE ACCEPTANCE OF THE ADEQUACY OF COVERAGE, COMPLIANCE WITH THE REQUIREMENTS OF THE AGREEMENT, OR AN AMENDMENT TO THE AGREEMENT.

ERAP

LINK FILES

(b) (7)(F), (b) (3)

KOCH FACILITIES

- Crude Station
- Product Terminal

KOCH PIPELINES

- Crude Pipeline
- Product Pipeline
- Buffered Transport Paths (Overland Flow & Hydrographic Transport Paths, Lateral Spread & Water Body Polygons)

SAN ANTONIO TERMINAL

BEXAR COUNTY, TEXAS

0 0.5 1 2 3 Miles

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