Response Plan Certification

This is to certify that Lone Star NGL Mont Belvieu L.P. has obtained through contract or other approved means the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of such a discharge. Also, that this Response Plan has been prepared to be consistent with the National Contingency Pan (2010) and all applicable (and available) Area Contingency Plans.

Brad Widener
Sr. Director of Operations

8-9-13
Date

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INTRODUCTION

This Response Plan contains specific information related to Lone Star NGL Mont Belvieu L.P.'s Response Zone 1 – Mont Belvieu, Texas. Applicable Response Plan requirements of the DOT and EPA are found within this Plan for specific facilities, terminals, and sections of Lone Star NGL Mont Belvieu L.P.'s pipeline within Response Zone 1. This Plan provides a summary of system-wide emergency response procedures and specific procedures as they relate to Lone Star NGL Mont Belvieu L.P.'s pipeline and facilities within Response Zone 1. In addition, supporting documentation such as worst-case discharge calculations, hazard evaluations (as needed), response resources, and emergency telephone directories are found within this Plan.

The Response Plan is divided into the following sections:

Section 1.0 – Information Summary
Section 2.0 – General Emergency Response Procedures
Section 3.0 – Spill Detection and Mitigation Procedures
Section 4.0 – Notification and Command Reporting Structure
Section 5.0 – Telephone Directory
Section 6.0 – Site Specific Response Resources
Section 7.0 – Training and Drill Procedures
Section 8.0 – Discharge Volumes and Planning
Section 9.0 – Product MSDS
Section 10.0 – Forms
Section 11.0 – Drawings and Plot Plans

SECTION 1.0 INFORMATION SUMMARY

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INFORMATION SUMMARY

Introduction to Mont Belvieu Terminals

Lone Star NGL Mont Belvieu L.P.'s Mont Belvieu Terminals includes pipeline and related facilities that fall within the PHMSA designated oil spill Response Zone 1. The pipeline facilities located in this zone are: Cedar Bayou Terminal, Pipelines CB1, CB2 and P12, in Harris and Chambers County, Texas. The P12 gasoline/diesel pipeline runs from EPCO's Baytown Terminal to Lone Star NGL Mont Belvieu South Terminal.

Lone Star NGL Mont Belvieu L.P.'s corporate offices are located in San Antonio, Texas and can be reached at:

Mailing address:	*Physical address*
Lone Star NGL Mont Belvieu L.P. 800 E. Sonterra Blvd. Suite 400 San Antonio, Texas 78258 832-668-1000 (main number)	Same

Lone Star NGL Mont Belvieu L.P.'s Cedar Bayou Terminal can be reached at:

Mailing address:	*Physical address*
Lone Star NGL Mont Belvieu L.P. Mont Belvieu Products Terminal. P.O. Box 250 Mont Belvieu, Texas 77580	Lone Star NGL Mont Belvieu L.P. Cedar Bayou Terminal 4201 FM 1942 Crosby, Texas 77532

LAT: (b) (7)(F), (b) (3)
LONG:

Lone Star NGL Mont Belvieu L.P.'s South Terminal can be reached at:

Mailing address:	*Physical address*
Lone Star NGL Mont Belvieu L.P. Mont Belvieu South Terminal. P.O. Box 250 Mont Belvieu, Texas 77580	Lone Star NGL Mont Belvieu L.P. Cedar Bayou Terminal 10943 Hwy 146 North Mont Belvieu, Texas 77580

LAT: (b) (7)(F), (b) (3)
LONG:

Mutual Aid Organization Membership – Lone Star NGL Mont Belvieu L.P. is a member of the following mutual aid organizations:

Houston Clean Channel Association (HCCA): Mutual Aid Association for initial response to a spill incident. The membership is comprised of industry located on and in close proximity to the Houston, Texas Ship Channel.

Mutual Aid Mont Belvieu (MAMB): Mutual Aid Fire Rescue/Hazardous Materials Response comprised of local industry in the Mont Belvieu/Baytown (Harris/Chambers County) area of Texas.

Worst Case Discharges

The Worst Case Discharge scenario for the DOT-regulated facilities within Lone Star NGL Mont Belvieu L.P.'s Response Zone 1 is the largest storage tank located at the Cedar Bayou Terminal. The worst case discharge would therefore be (b) (7)(F), (b) (3) In the event of a release from this tank, Ultra-low Sulfur Diesel No. 2 (distillate) would enter Cedar Bayou which eventually flows into the Houston Ship Channel and Galveston Bay.

The Worst Case Discharge to coastal waters within Lone Star NGL Mont Belvieu L.P.'s Response Zone 1 is pipeline P12 at the Cedar Bayou crossing. The worst case discharge would therefore be (b) (7)(F), (b) (3). In the event of a release from this pipeline, diesel fuel would enter Cedar Bayou which eventually flows into the Houston Ship Channel and Galveston Bay.

A complete description of the Worst Case Discharge scenario, volume calculations and planning distances is included in Section 8.0 – Discharge Volumes and Planning.

Table 1.3a – TX GLO Response Zone 1/ Worst Case Discharge

Pipeline(s) and/or Facility (source, Sig. & Sub. Reason)	Product	Worst Case Discharge Volume
(b) (7)(F), (b) (3)		

Table 1.3b – DOT Response Zone 1/ Worst Case Discharge

Pipeline(s) and/or Facility (source, Sig. & Sub. Reason)	Product	Worst Case Discharge Volume
(b) (7)(F), (b) (3)		

Significant and Substantial Harm Potential

Lone Star NGL Mont Belvieu L.P. has determined that Lone Star NGL Mont Belvieu L.P.'s Cedar Bayou Terminal and all pipeline sections within Response Zone 1 has significant and substantial harm potential due to proximity to navigable waters, sensitive areas, public drinking water intakes, or combinations thereof. Counties within which Lone Star NGL Mont Belvieu L.P.'s pipeline occurs and significant and substantial harm potential exists are:

- Chambers County, Texas
- Harris County, Texas

Table 1-1 provides a list of line sections with significant and substantial harm potential. A listing of the storage tanks at Cedar Bayou can be found in Table 1.2. A plot plan of the Cedar Bayou Terminal is located in Section 11.0.

Table 1-1 – Pipeline Sections with Significant and Substantial Harm Potential
ZONE 1 – Mont Belvieu, Texas

Pipeline No.	Milepost to Milepost	Line Size	Milepost Description	County	State
P12	(Start) 0.00	10"	Baytown Terminal	Harris	Texas
	(End) 9.89	10"	Mont Belvieu South Terminal	Chambers	Texas
CB1	n/a	20"	Mont Belvieu South Terminal	Chambers	Texas
	n/a	20"	Cedar Bayou Terminal	Harris	Texas
CB2	n/a	20"	Mont Belvieu South Terminal	Chambers	Texas
	n/a	20"	Cedar Bayou Terminal	Harris	Texas

Table 1.2 – Cedar Bayou Storage Tanks with Significant and Substantial Harm Potential
Zone 1– Mont Belvieu, Texas

Tank No.	Material Stored	Capacity (bbls)	Construction	Potential Failure Cause
T-5010	Gasoline	200,000	Welded Steel	Leaks, Overfill, Rupture
T-5020	Distillate	150,000	Welded Steel	Leaks, Overfill, Rupture
T-5030	Distillate	200,000	Welded Steel	Leaks, Overfill, Rupture
T-5040	Gasoline	150,000	Welded Steel	Leaks, Overfill, Rupture
T-5050	Nat. Gasoline	200,000	Welded Steel	Leaks, Overfill, Rupture
T-5110	Distillate	200,000	Welded Steel	Leaks, Overfill, Rupture
T-5120	Distillate	150,000	Welded Steel	Leaks, Overfill, Rupture
T-5130	Distillate	300,000	Welded Steel	Leaks, Overfill, Rupture
T-5210	Transmix	15,000	Welded Steel	Leaks, Overfill, Rupture

Figures 1 and 2 are maps of Lone Star NGL Mont Belvieu L.P.'s Response Zone I.

Applicable Area Contingency Plans

The following area and regional contingency plans have been reviewed and incorporated into the Lone Star NGL Mont Belvieu L.P.'s OPA 90 Response Plan.

One Gulf Plan (2012), as available on the internet at the following address:
http://gisweb.glo.texas.gov/atlas/masterpage.pdf

US EPA Region VI Regional Integrated Contingency Plan (RICP), as available on the internet at the following address: http://bpoilspill.us/wp-content/uploads/2010/06/Interim-Region-6-Integrated-Response-Plan.pdf

Response Plan Certification

This is to certify that Lone Star NGL Mont Belvieu L.P. has obtained through contract or other approved means the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of such a discharge. Also, that this Response Plan has been prepared to be consistent with the National Contingency Pan (2010) and all applicable (and available) Area Contingency Plans.

Brad Widener
Sr. Director of Operations

Date

Related Lone Star NGL Mont Belvieu L.P. Documents

This Response Plan is supplemented by the following Company Manuals:

- Operating & Maintenance Manual: This manual provides procedures required by DOT to ensure the safe operation and maintenance of the pipeline system. These procedures are intended to ensure system-wide compliance with the rules and regulations of 49 Code of Federal Regulations (CFR) Part 195, as well as materials incorporated by reference in 49 CFR 195.3.
- Safety Procedures Manual: This manual provides procedures to ensure daily operations and maintenance activities are conducted to prevent accidents and to promote safe and healthful working conditions in accordance with applicable Occupational Safety and Health Administration (OSHA) regulations.
- Environmental Procedures Manual: This manual provides guidance and procedures to comply with federal, state, and local laws and regulations relating to the protection of the environment, as well as the safety and well-being of employees and of the citizens affected by Lone Star NGL Mont Belvieu L.P. operations.
- Spill Release and Reporting Guide: This manual contains short-term federal and state reporting requirements regarding the notification of reportable spills and releases.

Regulatory Framework

While the majority of the Lone Star NGL Mont Belvieu L.P. pipeline system is regulated under OPA 90 by the DOT, there are some facilities within the products pipeline system that, due to their configuration and location, fall under EPA jurisdiction. Table 1.1, below, lists all major facilities within the Response Zone and their regulatory framework.

Table 1.3 – Lone Star NGL Mont Belvieu L.P. Response Zone 1 – Mont Belvieu, Texas
Facilities and Regulatory Framework

Facility	Federal Jurisdiction (other than DOT)	EPA SPCC Plan
Mt. Belvieu South Terminal	✓	✓
Mt. Belvieu North Terminal	✓	✓
Cedar Bayou Terminal	✓	

The Oil Pollution Act of 1990 (OPA 90) requires all petroleum transmission, storage, or handling facilities to provide Facility Response Plans detailing each facility's "abilities" to respond to a spill.

The majority of the pipeline system is transportation related and therefore is primarily regulated by the Pipeline and Hazardous Materials Safety Administration (PHMSA). For non transportation-related portions of Lone Star NGL Mont Belvieu L.P.'s facilities jurisdiction lies with the EPA.

Lone Star NGL Mont Belvieu L.P. has created this Response Plan, which most closely follows DOT/PHMSA guidelines as detailed in 49 CFR 194. A separate Spill Prevention Control and Countermeasure Plan (SPCC) has been prepared for those facilities that meet the SPCC requirements.

This Response Plan was also written to comply with TAC Title 31, Part 1, Chapter 19—Oil Spill Prevention and Response. The OSPRA regulations require the preparation and implementation of a Discharge Prevention and Response Plan seaward of the GLO Line of Demarcation for facilities located within 100 yards of coastal waters. Facilities must apply for, and obtain, an Oil Spill Prevention and Response Certificate from the GLO prior to beginning operation.

Regulations Cross Reference List The following lists cross reference information and checklists necessary for plan reviewers to determine compliance with specific regulatory requirements.

RESPONSE PLAN ELEMENT	TGLO DPRP 31 TAC 19	DOT PHMSA 49 CFR 194
		APPENDIX OF FINAL REGULATION[1]
Cross Index		As appropriate
Emergency Response Action Plan		As appropriate
Facility Information Facility address(physical and mailing) Facility latitude and longitude	 19.13(c)(3) 19.13(c)(4)(A)	Section 1
Facility's Primary Activity	19.13(c)(4)(B)	
Facility Owner/Operator Contact Information	19.13(c)(1)	Section 1
Table of Contents		As appropriate
Records of Changes for Plan Update		Section 1
Notification Procedures: Emergency notification telephone list Spill response notification form		Section 4
Unmanned facilities commitment to maintain in a prominent location a sign or placard for notification of GLO and NRC with the 24-hour phone numbers	19.13(c)(5)	
Identification of Qualified Individual[2] or Person in Charge	19.13(c)(2)	Sections 5
Responsibilities of Qualified Individual[2]		Section 4 and 7
Types of oil handled/ MSDS preparation and location	19.13(c)(4)(C)	Section 1 and 9
Storage capacity of each tank used for storing oil	19.13 (c)(4)(D)	Section 1
Diameter of all lines through which oil is transferred	19.13(c)(4)(E)	Section 1
Average daily throughput of oil at the facility	19.13(c)(4)(F)	Section 1
Dimensions and capacity in barrels of the largest oil-handling vessel which docks at the facility	19.13(c)(4)(E)	

RESPONSE PLAN ELEMENT	TGLO DPRP 31 TAC 19	DOT PHMSA 49 CFR 194
		APPENDIX OF FINAL REGULATION[1]
Spill Volumes/Discharges Scenarios: Planning volume for average most probable (small) discharge Planning volume for maximum most probable (medium) discharge Planning volume for worst case discharge	19.13(d)(3) 19.13(d)(1)	Section 1 and
Emergency transfer procedures	19.13(c)(8)	
Description of any secondary containment or diversionary structures or equipment to prevent discharged oil from reaching coastal waters, including methodology for determining the adequacy of the structures or equipment	19.13(c)(11)	
Statement that all facility personnel who might be involved in an oil spill response have been informed that detergents or other surfactants are prohibited from being used on an oil spill in the water, and that dispersants can only be used with the approval of the Regional Response Team	19.13(c)(10)	
Disposal Plans		As appropriate
*Spill response resources for worst case discharge[1] Identification of spill removal organization(s)/evidence of contracts Equipment lists Personnel lists	19.13(d)(5)(C) 19.13(d)(6)	Section 6 and 9
Evacuation Plan		As appropriate
Site-Specific Safety and Health Plan		Section 10
Hazard Identification/Facility-Specific Information		Section 3

RESPONSE PLAN ELEMENT	TGLO DPRP 31 TAC 19	DOT PHMSA 49 CFR 194
		APPENDIX OF FINAL REGULATION[1]
Identification of sensitive areas/vulnerability analysis	19.13(d)(2)	Sections 11
Analysis of Spill Potential		As appropriate
Spill History		As appropriate
Discharge Detection Systems		Section 3
Discharge Prevention Procedures, including procedures to prevent discharges from transfers of oil	19.13(c)(6) 19.13(d)(4)	Section 8
Strategic plans to contain and clean up unauthorized discharges	19.13(c)(9)	
Implementation of Response Activities		Section 3
*Training[2]		Section 6
*Drills[2] Documentation of annual drill and notification of TGLO, NRC and third parties	19.13(c)(7) 19.13(d)(5)(A) 19.13(d)(5)(B) 19.13(d)(5)(D)	Section 7
Diagrams		Sections 11
Security		As appropriate
*Consistency with NCP and ACPs[2]		194.107(c)

1 Final Rule, Response Plan for Onshore Oil Pipelines, 49 CFR part 194, 58 FR 244, January 5, 1993.
2 The response plan requirements with an asterisk refer to the response planning provisions under Section 4202 of the Oil Pollution Act of 1990.

U.S. Department of Transportation Checklist

Written in English?	Yes
Indicate the availability of a second language translation?	Yes
Is a second language plan required based on contract with the operator?	No
A statement certifying that the operator has reviewed current NCP?	Sec. 1.0
Consistent with the NCP in effect at time of submission?	Sec. 1.0
Avoid the use of sinking agents as an acceptable response method?	
Identify each of the existing applicable ACPs?	Sec. 1.0
Contain certification by operator that FRP is consistent with each applicable ACP?	Sec. 1.0
Demonstrate consistency with the ACPs?	Sec. 1.0
INFORMATION SUMMARY	
Stand alone?	Yes
Include the following operator information:	Sec. 1.0
Name of Operator?	Sec. 1.0
Street Address of Operator?	Sec. 1.0
City, State Zip Code?	Sec. 1.0
Include a list of response zones that meet criteria for significant and substantial harm?	Sec. 1.0
Include a description of response zones, including county(s) and state(s)?	Sec. 1.0
RESPONSE ZONE APPENDIX	
Is there a Response Zone Appendix Information Summary?	Sect. 1.0
Include the Core Plan Information Summary?	Yes
Identify the following:	
Name of Qualified Individual available on a 24-hour basis?	Sec.5.0
Telephone number of QI?	Sec.5.0
Name of Alternate Qualified Individual available on a 24-hour basis?	Sec.5.0
Telephone number of Alt. QI?	Sec.5.0
Include a description of response zones, including county(s) and state(s)?	Sect. 1.0
Separate description for each response zone?	Sec.1.0
Include a list of line sections?	Sec.1.0
Include a list of line sections identified by milepost, survey station number, etc.?	Sec.1.0
If response zone contains multiple pipeline systems, are they all described?	Yes
Include the basis for determination that the response zone meets criteria for significant and substantial harm?	Sec.1.0
Identify the type of oil of the worst case discharge?	Sec.1.0
Are all types of oil that may be transported listed?	Sec.1.0
Identify the volume of the worst case discharge?	Sec.1.0
NOTIFICATION PROCEDURES	
Identify a person, position, or facility responsible for initiating immediate notification?	Sec.1.0
Indicate that the person/position is capable of initiating notification on a 24 hour basis?	Sec. 4.0

Identify a person or position responsible for preparing follow-up notification?	Sec. 4.0
Contain prioritized notification list?	Sec. 5.0
Notification list include the following telephone numbers:	
Qualified Individual?	Sec. 5.0
Oil Spill Removal Organization(s)?	Sec. 5.0
National Response Center – 1-800-424-8802 or 202-267-2675?	Sec. 5.0
State Emergency Response Commission?	Sec. 5.0
Local Emergency Planning Committee?	Sec. 5.0
Company personnel (spill management team)?	Sec. 5.0
Insurance representative(s) or surveyor(s)?	Sec. 5.0
Prioritized notification list appears to be appropriate?	Yes
Procedures indicate the following required contacts can be reached on a 24-hour basis:	
Qualified Individual?	Sec. 5.0
OSRO?	Sec .5.0
Company personnel (spill response team)?	Sec .5.0
Describe primary means of communication for all notifications?	Sec. 2.0
Describe secondary means of communication for all notifications?	Sec. 2.0
Initial notification includes the following information?	Sec. 2.0
Name of pipeline operator?	Sec. 2.0
Time of discharge?	Sec. 2.0
Location of discharge?	Sec. 2.0
Name of oil involved?	Sec. 2.0
Reason for discharge?	Sec. 2.0
Estimated volume of oil discharged?	Sec. 2.0
Weather conditions on scene?	Sec. 2.0
Actions taken by persons on scene?	Sec. 2.0
Actions planned by persons on scene?	Sec. 2.0

SPILL DETECTION

Identify personnel responsible for leak detection?	Sec. 3.0
Identify equipment or techniques to detect the spill?	Sec. 3.0
Identify equipment or techniques to locate the spill?	Sec. 3.0
Identify the maximum time to perform detection and throughput shutdown in adverse weather?	Sec. 3.0

RESPONSE ACTIVITIES

Describe a concept of operations, including:	Sec. 4.0
Notification of personnel?	Sec. 4.0
Mobilization of equipment?	Sec. 4.0
Deployment of equipment?	Sec. 4.0
Establishment of communications among company response personnel, contractors, etc.?	Sec. 4.0
Response strategies?	Sec. 4.0
Describe a concept of operations for the first 7 days of response?	
Identify the response strategies unique to the response zone for:	
Mitigation?	Sec. 4.0
Containment?	Sec. 4.0
Protection?	Sec. 4.0
Recovery?	Sec. 4.0
Disposal?	Sec. 4.0
Size of response zone permit planned response activities within appropriate tier times?	Sec. 4.0
Operator's Response Organization include:	Sec. 4.0
Description of the Incident Command System?	Sec. 4.0
Description of roles and responsibilities for:	Sec. 4.0
Qualified Individual?	Sec. 4.0

Other operator response personnel?	Sec. 4.0
Contracted OSRO?	Sec. 4.0
Description of the organizational interfaces with:	
OSRO?	Sec. 4.0
State and local responders?	Sec. 4.0
Federal On-Scene Coordinator?	Sec. 4.0

WORST CASE DISCHARGE CALCULATIONS

Provide WCD volume for the response zone?	Sec. 8.0
Provide calculations and methodology used for determining the WCD for the response zone?	Sec. 8.0
Is WCD volume calculated using one of the three specified methods?	Sec. 8.0
Operator's calculation of the WCD accurate.	Sec. 8.0

RESPONSE RESOURCES

Certification that the operator has obtained personnel and equipment to respond to WCD?	Sec. 1.0
Certification signed by the Qualified Individual, an appropriate corporate officer?	Sec. 1.0
Identify the following:	
A Qualified Individual?	Sec. 5.0
At least one Alternate Qualified Individual?	Sec. 5.0
Operator personnel with responsibilities on the spill management team?	Sec. 5.0
OSRO available:	
Names(s)?	Sec. 5.0
Address(es)?	Sec. 5.0
Telephone Number(s)?	Sec. 5.0
Change in ownership?	Sec. 5.0
Describe procedures for incorporating needed improvements identified in the following:	
Post-drill evaluation results?	Sec.7.0
Post-incident evaluations results?	Sec.7.0
Describe procedures for modifying and resubmitting the plan for PHMSA approval?	Introduction
Sufficient numbers of trained personnel for the first 7 days of response?	Sec. 4.0
Identify equipment resources sufficient to respond to a WCD to the maximum extent practicable:	
Containment equipment?	Sec. 6.0
Spill Recovery Equipment?	Sec. 6.0
Temporary storage capacities for recovered oil?	Sec. 6.0
Communications equipment to be used to coordinate response activities?	Sec. 6.0
Identify equipment that is operator owned and maintained?	Sec. 6.0
Identify equipment that will be provided by the OSRO?	Sec. 6.0
Identify the location of all response equipment?	Sec. 6.0
Can equipment be mobilized and deployed with the specified tier times?	Sec. 6.0
Are containment/recovery equipment capacities described in detail to determine adequacy?	Sec. 6.0
Describe a maintenance program that includes:	
Procedures?	Sec. 6.0
Frequencies for operability checks?	Sec. 6.0
Routine maintenance?	Sec. 6.0

Identify the person responsible for performance of equipment maintenance and testing?	Sec. 4.0
TRAINING	
Provide training for response personnel including their responsibilities under the plan?	Sec. 7.0
Provide procedures for response personnel contacting the operator on a 24hour basis?	Sec. 7.0
Provide training for reporting personnel on the content of the plan Information Summary?	Sec. 7.0
Provide training for reporting personnel that includes telephone number(s) of the NRC?	Sec. 7.0
Provide training for response personnel including:	
Characteristics of hazards of oil?	Sec. 7.0
Conditions that are likely to worsen emergencies?	Sec. 7.0
Steps necessary to control an accidental discharge of oil?	Sec. 7.0
Steps necessary to minimize the potential for fire, explosion, or environmental damage?	Sec. 8.0
Proper firefighting procedures and use of personal protective equipment?	Sec. 8.0
Addresses the appropriate levels of training as required by OSHA 29 CFR 1910.120?	Sec. 7.0
Describe frequency of training to be provided?	Sec. 7.0
Describe the maintenance of training records for each individual assigned to the response organization?	Sec. 7.0
Identify the location of training records?	Sec. 7.0
Describe how training records will be maintained for response personnel other than operator personnel, i.e., contractors?	Sec. 7.0
Describe method of maintaining records or instructors and/or training organization(s)?	Sec. 7.0
Identify or mention requirement to maintain training records for each individual that has been trained as long as the individual is assigned duties under the response plan?	Sec. 7.0
DRILLS AND EXERCISES	
Describe method for conducting internal drills?	Sec. 7.0
Describe method for conducting external drills?	Sec. 7.0
Drill program include both:	Sec. 7.0
Announced drills?	Sec. 7.0
Unannounced drills?	Sec. 7.0
Drill program includes:	Sec. 7.0
Qualified Individual notification drills?	Sec. 7.0
Drills of manned and/or unmanned pipeline emergency procedures?	Sec. 7.0
Spill management team tabletop drills?	Sec. 7.0
OSRO equipment deployment drills?	Sec. 7.0
Drills that aggregately test the entire response plan for each response zone?	Sec. 7.0
Describe a 3-year drill and exercise cycle?	Sec. 7.0
Identify the following drills to be conducted on a quarterly basis:	Sec. 7.0
Qualified Individual notification drills for manned and/or unmanned pipelines?	Sec. 7.0
Manned and/or unmanned pipeline emergency procedures?	Sec. 7.0
Identify the following drills to be conducted on an annual basis:	Sec. 7.0
Spill management team tabletop drills?	Sec. 7.0
OSRO equipment deployment drills of representative types of key equipment?	Sec. 7.0

At least one unannounced internal drill?	Sec. 7.0
Identify the following drills to be conducted at least once every 3 years:	Sec. 7.0
Drills that aggregately test all the response components of the entire response plan?	Sec. 7.0
Describe a drill program and procedures that:	Sec. 7.0
Assign responsibility for the drill program?	Sec. 7.0
Identify the process for implementing the program?	Sec. 7.0
Describe procedures for maintaining drill documentation for 3 years and ensuring the availability of such records to PHMSA?	Sec. 7.0

PLAN REVIEW AND UPDATE PROCEDURES

Describe the requirement that operator will review the FRP at least once every 3 years.	Introduction
Identify key factors that may cause revisions to the response plan:	
New pipeline construction or purchase?	Introduction
Different WCD volume?	Introduction
Change in commodities transported?	Introduction
Change in OSRO?	Introduction
Change in Qualified Individual?	Introduction
Change in NCP/ACP that has a significant impact on the appropriateness of response equipment or response strategies?	Introduction
Change in response procedures?	Introduction
Describe procedures for plan revision within 30 days of change in conditions?	Introduction

TGLO DPRP

Facilities must apply for an Oil Spill Prevention and Response Certificate from the GLO prior to beginning operation. After the GLO determines the application is administratively complete, the GLO will contact the facility operator to schedule an on-site inspection and review of their Discharge Prevention and Response Plan. The Plan must support the facility's current operations and must be developed in accordance with Title 31, Part 1, Chapter 19, Subchapter B, Rule §19.13—Requirements for Discharge Prevention and Response Plans.

The GLO will issue an Oil Spill Prevention and Response Certificate with a term of five years from the date of issuance. Each Certificate will be assigned an identification number, which will allow the facility operator to review and amend the facility information on the GLO's Oil Spill Prevention and Response Program interactive website. The identification number will be sent to the person who signed the application form, along with instructions on how to update and renew the certificate.

The Certificate becomes void when there is a change in the operator, or when the facility changes its operations in a manner that increases its facility classification level. These changes will require the operator to update the Discharge Prevention and Response Plan and apply for a new Certificate.

TGLO—DPRP Checklist

Oil Spill Prevention and Response (31TAC §19)		Plan Reference
Required elements for all facility classifications		
19.13(c)(1)	Owner and operator of the facility	Sec. 1.0
19.13(c)(2)	The person or persons in charge of the facility	Sec. 4.0
19.13(c)(3)	The name and address (both physical and mailing) of the facility	Sec. 1.0
19.13(c)(4)(A)	The location of the facility by latitude and longitude	Sec. 1.0
19.13(c)(4)(B)	The facility's primary activity	Sec. 1.0
19.13(c)(4)(C)	The types of oil handled, whether MSDS have been prepared for them and the location of where the MSDS are maintained	Sec. 9.0
19.13 (c)(4)(D)	The storage capacity of each tank used for storing oil	N/A
19.13(c)(4)(E)	The diameter of all lines through which oil is transferred	Sec. 1.0,
19.13(c)(4)(F)	The average daily throughput of oil at the facility	Sect.7.0
19.13(c)(4)(E)	The dimensions and capacity in barrels of the largest oil-handling vessel which docks at the facility	N/A
19.13(c)(5)	For a facility which normally does not have personnel on-site, a commitment to maintain in a prominent location a sign or placard which states that the GLO and National Response Center are to be notified of an oil spill and gives the 24-hour phone numbers for notifying the GLO and National Response Center	Sec. 5.0
19.13(c)(6)	A general description of measures taken by the facility to prevent unauthorized discharges of oil	Sec. 3.0
19.13(c)(7)	A plan to conduct an annual oil spill drill that entails notifying the GLO and National Response Center and keeping a log at the facility which documents when the notification drill was conducted and facility personnel who participated in it	Sec. 6.0
19.13(c)(8)	Emergency transfer procedures to be implemented if an actual or threatened unauthorized discharge of oil occurs at the facility	Sec. 3.0
19.13(c)(9)	Strategic plans to contain and clean up unauthorized discharges of oil from the facility	Sec. 4.0
19.13(c)(10)	A statement that all facility personnel who might be involved in an oil spill response have been informed that detergents or other surfactants are prohibited from being used on an oil spill in the water, and that dispersants can only be used with the approval of the Regional Response Team	Sec. 6.0

Oil Spill Prevention and Response (31TAC §19)		Plan Reference
19.13(c)(11)	A description of any secondary containment or diversionary structures or equipment at the facility to prevent discharged oil from reaching coastal waters, including the methodology for determining that the structures or equipment are adequate to prevent oil from reaching coastal waters	Sec. 8.0
Required elements for facilities classified as intermediate (> 1,320 gallons, ≤ 250,000 gallons; line diameter > 4 inches, ≤ 12 inches)		
19.13(d)(1)	A description of the worst case unauthorized discharge of oil reasonably likely to occur at the facility and the rationale used to determine this discharge	Sec. 8.0
19.13(d)(2)	A description and map of environmentally sensitive areas that would be impacted by the worst case discharge and plans for protecting these areas if an oil spill occurs at the facility.	Sec. 8.0
19.13(d)(3)	A description of the facility's response strategies to contain and clean up the worst case unauthorized discharge	Sec. 3.0
19.13(d)(4)	A description of discharge prevention procedures implemented at the facility, including procedures to prevent discharges from transfers of oil	Sec. 3.0
19.13(d)(5)(A)	A plan to conduct an annual oil spill drill that includes notifying the GLO and National Response Center	Sec. 7.0
19.13(d)(5)(B)	A plan for notifying any third parties, such as discharge cleanup organizations, which have agreed to respond to an oil spill and confirming they would be able to respond to an oil spill at the facility on the day of the drill	Sec. 7.0
19.13(d)(5)(C)	If the facility has spill response equipment stored on site, a plan for deployment of a representative portion of the equipment which would be used to respond to the type of discharge most likely to occur at the facility	Sec. 7.0
19.13(d)(5)(D)	A log documenting when the annual drill was conducted and the facility personnel who participated in it	Sec. 7.0
19.13(d)(6)	If the operator has entered into any oil spill response or cleanup contracts or basic ordering agreements with a discharge cleanup organization, copies of the contracts or agreements or a narrative description of their terms	Sec. 5.0

Acronyms

AC:	Area Committee
ACP:	Area Contingency Plan
ANSI:	American National Standards Institute
API:	American Petroleum Institute
ASME:	American Society of Mechanical Engineers
ASTM:	American Society of Testing Materials
bbls:	Barrels
bpd:	Barrels per Day
bph:	Barrels per Hour
CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act
CFR:	Code of Federal Regulations
CHEMTREC:	Chemical Emergency Transportation Center
CO:	Commanding Officer
COFR:	Certificate of Financial Responsibility
COTP	Captain of the Port (USCG)
CWA:	Clean Water Act of 1977 (amended the FWPCA)
DBPD:	Derated Barrels Per Day
DCO:	Discharge Cleanup Organization (Also called OSRO)
DOC:	Department of Commerce
DOE:	Department of Energy
DOI:	Department of Interior
DOT:	Department of Transportation
DRAT:	District Response Advisory Team
DRG:	District Response Group
EC:	Emergency Coordinator
EPA:	Environmental Protection Agency
ERAP:	Emergency Response Action Plan
ERCS:	Emergency Response Cleanup Services (Contractor)
ERT:	Emergency Response Team
FAA:	Federal Aviation Administration
FEMA:	Federal Emergency Management Agency
FOSC:	Federal On-Scene Coordinator
FRP:	Facility Response Plan
gal:	Gallons
gpm:	Gallons per Minute
HAZMAT:	Hazardous Materials
IC:	Incident Commander
ICS:	Incident Command System
LCP:	Local Contingency Plan
LEPC:	Local Emergency Planning Committee
LPG:	Liquefied Petroleum Gas
LQG:	Large Quantity Generator
MOP:	Maximum Operating Pressure

MSO:	Marine Safety Office (USCG)
MSDS:	Material Safety Data Sheet
NACE:	National Association of Corrosion Engineers
NCP:	National Oil and Hazardous Substances Pollution Contingency Plan
NIOSH	National Institute for Occupational Safety and Health
NOAA:	National Oceanic and Atmospheric Administration (part of DOC)
NRC:	National Response Center
NRDA	Natural Resource Damage Assessment
NSCC:	National Scheduling Coordinating Committee
OEPA:	Ohio Environmental Protection Agency
O&M:	Lone Star NGL Mont Belvieu L.P. Operations and Maintenance Manual
OPA 90:	The Oil Pollution Act of 1990
OPS:	Office of Pipeline Safety
OSC:	On-Scene Coordinator
OSHA:	Occupational Safety and Health Administration
OSRO:	Oil Spill Removal Organization
PIAT:	Public Information Assist Team
PHMSA	Pipeline and Hazardous Materials Safety Administration
PREP:	National Preparedness for Response Exercise Program
PRP:	Potentially Responsible Party
QI:	Qualified Individual
RCP:	Regional Contingency Plan
RCRA:	Resource Conservation and Recovery Act
RP:	Responsible Party
RRT:	Regional Response Team
SARA:	Superfund Amendments and Reauthorization Act
SHPO:	State Historic Preservation Officer
SOP:	Standard Operating Procedure
SOSC:	State On-Scene Coordinator
SPCC:	Spill Prevention, Control, and Countermeasures
SSC:	Scientific Support Coordinator
SUPSALV:	U.S. Navy Supervisor of Salvage
TCEQ	Texas Commission on Environmental Quality
TGLO:	Texas General Land office
TOSPRA:	Texas Oil Spill Prevention and Response Act of 1991
TRRC:	Texas Railroad Commission
TTX:	Tabletop Exercise
TSDF:	Toxic Substance Disposal Facility
UCS:	Unified Command System
US:	United States of America
USCG:	United States Coast Guard
USFWS:	U.S. Fish and Wildlife Service
WCD:	Worst Case Discharge

Plan Review and Update Procedures

The OPA 90 Oil Spill Response Plan will be reviewed by the Environmental Department and resubmitted to PHMSA at least once every 5 years from last plan approval date.

The Qualified Individual (QI) is responsible for updating and reviewing the Response Plan. This review is conducted annually, using the Plan Review & Update Checklist. Whenever a "yes" is entered on the checklist, the Response Plan is modified to address new or different operating conditions or information.

If a new/different operating condition or information would substantially affect the implementation of the Response Plan, the Plan is modified to address such a change. These changes are submitted to the appropriate Governing Agencies (USEPA, USCG, PHMSA) within 30 days of making the revisions to the Plan.

In addition, changes to the Plan will be made as a result of post-drill and post-incident evaluations. After each drill and incident, documentation from the drill or spill event will be reviewed by the QI. Modifications to the Plan will be done according to the recommendations of the QI.

All changes to the Response Plan should be documented on the Record of Changes (ROC) Form located in this Section of the Core Plan under Plan Updates and Changes - Log.

Annual Plan Review & Update Checklist

Zone/Facility Name: _____ Date _____

	Yes / No:	*Since the last Response Plan Update:*
(1)	_____	Has there been an existing pipeline extension, new pipeline construction, or a change of ownership of pipeline section(s) or related facilities?
(2)	_____	Has any reconstruction/overhaul of existing pipeline or facility occurred that could affect spill response planning or the Worst Case Discharge Volume/Scenario?
(3)	_____	Has the type(s) of oil identified in the plan (as transported/stored by the pipeline/facility) changed?
(4)	_____	Are any changes needed in the Emergency Response Action Plan, or have Lone Star NGL Mont Belvieu L.P.'s O&M Plans and Procedures changed?
(5)	_____	Are any changes needed in the Incident Command and Reporting Requirement Diagram, Environmental Event Report, or the Accident Report-Hazardous Liquid Pipeline?
(6)	_____	Are any changes needed for Spill Detection/Mitigation Procedures?
(7)	_____	Are any changes or additions needed for the Incident Reporting Structure Diagram?
(8)	_____	Has the names or response capabilities of the dedicated Oil Spill Removal Organizations –OSRO identified in the plan changed?
(9)	_____	Are any changes needed in the following Sections?: Probable Direction and Flow for Release, Discharge Volume Measurement, Material Sampling and Test Methods, or Identifying Locations Requiring Immediate Response?
(10)	_____	Are any changes needed in the removal strategies?
(11)	_____	Are any changes needed in the Storage and Disposal Procedures?
(12)	_____	Have any changes or additions occurred to Environmentally Sensitive Areas?
(13)	_____	Are any changes necessary for the wildlife or sensitive areas protection plans?
(14)	_____	Are all MSDS documents in the plan available, current, and include all presently transported products?
(15)	_____	Has the name of the QI identified in the plan changed?
(16)	_____	Has there been a change in the National or Area Contingency Plan that impacts the zone/facility's response equipment?
(18)	_____	Has any contact telephone number changed for federal, state, local, Company responders, or agencies?
(18)	_____	Have response drills required by PREP not been properly documented?
(19)	_____	Has the Federal Area Contingency Plan been revised?
(20)	_____	Are changes needed to the Response Plan as a result of a post spill exercise or actual event evaluation?

Plan Updates and Changes –Log

Record of Changes

Lone Star NGL Mont Belvieu L.P. Response Zone: Original Effective Date: March 2008

Date	Section/Appendix	Revision Author	Revision Description
7/8/08	Vol. I, TOC	C.L. Pate	Added local agencies to Sec. 5.0 TOC
7/8/08	Vol. I, Intro	C.L. Pate	Record of Changes
7/8/08	Vol. I, Sec 1.0	C.L. Pate	Revised corporate numbers, Table 1-5 and Table 1-6
7/8/08	Vol. I, Sec 2.0	C.L. Pate	Revised Corporate numbers and reference to figure(s)
7/8/08	Vol. I, Sec. 4.0	C.L. Pate	Removed pages 4-14 to 4-21 and added reference to form ICS 208 HM
7/8/08	Vol. I, Sec. 5.0	C.L. Pate	Added local agency contact information and revised contact numbers
7/8/08	Vol. II, Sec 1.0	C.L. Pate	Revised corporate numbers, Table 1-1 and Table 1-2
7/8/08	Vol. II, Sec 4.0	C.L. Pate	Added local agency contact information
7/8/08	Vol. II, Sec 6.0	C.L. Pate	Discharge volume
7/14/09	Vol. I, page 1-2	C.L. Pate	Addition of Tx GLO Worse Case Discharge
7/14/09	Vol. I, Intro	C.L. Pate	Record of Changes
7/14/09		C.L. Pate	Agency (GLO) review and manual update
9/30/09	Vol. 1, page 5-1 Vol. 2 page 4-4	C.L. Pate	Update of company contacts and phone numbers
4/14/10	Section 1	C.L. Pate	Update of Certification Page
4/14/10	Section 2	C.L. Pate	Notification Procedures
4/14/10	Section 5, pg 5-1	C.L. Pate	Corporate Office main number
5/20/11	Entire Manual	C.L. Pate	Change in Ownership
1/6/12	Entire Manual	C.L. Pate	Update of titles and QI/Alt QI, Updated maps.
6/19/12	OSROs	C.L. Pate	Updated OSRO information
5/30/13	Entire Manual	C.L. Pate	Update and reorganize for ease of use.
1/6/14	WCD and Federal Response Structure	C.L. Pate	Modification made per PHMSA letter of Correction

SECTION 2.0 GENERAL EMERGENCY RESPONSE PROCEDURES

Subsection ***Page Number***

Notification Procedures 2-1
Spill Detection and Mitigation Procedures 2-1
Emergency Plan 2-2
General Response Activities 2-2
Communications 2-3
Spill Reporting Procedures 2-3
Accident Reporting Procedures 2-4

GENERAL EMERGENCY RESPONSE PROCEDURES

This section contains a summary of Lone Star NGL Mont Belvieu L.P.'s general procedures for emergency response that are applicable to the entire system, including Notification Procedures, Spill Detection and Mitigation Procedures, and General Response Activities. For more detail on any of these subjects, refer to Volume I, Section 2.0 – Notification Procedures, Section 3.0 – Spill Detection and Mitigation Procedures, and Section 4.0 – Response Activities.

Notification Procedures

In the event of a spill perform the following seven steps:

CONTROL

1. Stop Product Flow: shut-off valves and stop pumps.
2. Eliminate Ignition Sources such as motors, electrical equipment, or open flames.

NOTIFY

3. Alert Personnel of Danger! and take safety or security precautions.
4. Begin Emergency Phone/Radio Notification. Refer to Section 5.0 – List of Contacts - System-Wide under Volume I and the Emergency Notification Phone Lists in Section 4.0 of this Response Zone Appendix.

CONTAIN

5. Begin Initial First-Level Spill Containment around the tank/pipe or with boom down stream of spill.
6. Start Spill Mitigation and response activities; contact the Oil Spill Response Contractor.
7. Protect the Public and Environmentally Sensitive Areas downstream or adjacent to any spill/fire affected areas.

Initial (primary) Emergency Notification is the responsibility of the discoverer until his/her immediate supervisor, the Sr. Field Manager (QI) or Sr. Director of Operations (Alt QI), has been contacted. Upon contact, the Immediate Supervisor, QI or Alt QI will assume all responsibility for subsequent and follow-up notifications.

The QI or Alt QI (or the delegated Spill Management Team Member) is responsible for all secondary notification. Secondary notification includes, but is not limited to, the other members of the Spill Management Team and Facility Response Team, additional federal/state/local Emergency Response Agencies, Oil Spill Removal Organizations (OSROs), or technical support.

Section 3.0 – Command and Reporting Structures of this Volume provides a listing of QIs. For a list of individuals to contact please refer to Volume I, Section 5.0 – List of Contacts, System-Wide and Volume II, Section 4.0 – Notification Telephone Directories.

Spill Detection and Mitigation Procedures

Spill detection is accomplished by four basic methods:

1. System-level indication
2. Aerial patrols
3. Continuing secondary surveillance
4. On-scene observation

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

[redacted]

Aerial patrols are typically performed at intervals not exceeding 3 weeks, but at least 26 times per year. The pilot/observer shall notify Lone Star NGL Mont Belvieu L.P. personnel of all problems or potential problems observed on each line section flown.

Continuing secondary surveillance is accomplished by Operation's Department Managers (both Region and Corporate) through continuing review of all pipeline records (Refer to O&M Manual Procedure M-220) and reports (i.e., Field Investigation, Corrosion Control, Daily Operating Performance data) and initiating immediate action to prevent spills and correct hazardous conditions.

On-scene observation is accomplished by utilizing regulatory-mandated and Company-implemented inspections, drills and surveys by Lone Star NGL Mont Belvieu L.P. operations and maintenance personnel. Valve inspections, pressure control device inspections and navigable waterway inspections are performed in accordance with requirements established to comply with federal and state regulations.

Emergency Plan

Lone Star NGL Mont Belvieu L.P.'s Company Emergency Plan shall be implemented in the event of an emergency to provide for the safety of the general public and company personnel, protect property from damage and maintain continuity of service. The Emergency Plan, found in Section 3.0 outlines the Pipeline Emergency Procedures and Abnormal Operations Procedures found in the Operations and Maintenance Manual.

Once an emergency is identified, employees located at the scene, or the first employees to arrive at the scene, shall take three basic and necessary actions, ***Control - Notify - Contain***. The employee should take action to eliminate, isolate, or minimize conditions causing or contributing to the emergency situation; ensure that immediate and proper notification is initiated; and take steps to prevent possible further injury, damage or spread of petroleum liquids.

General Response Activities

Once an incident occurs, an Incident Command System is put into place, identifying each individual responsible for specific activities. These individuals, as identified on the Incident Command System Worksheet (Figure 4-1); will be responsible to their respective roles until they are replaced by another individual. For more details regarding the use of the Incident Command System Worksheet, refer to Section 4.0 – Notification and Command Reporting Structure.

The Operations Technicians (Level 1, 2 or 3), upon the determination or notification of an incident, will initiate pre-designated steps for initial control, notification, and containment. The initial steps of control include, but are not limited to, the stopping of pumps and the blocking of appropriate valves and line sections. Notification of the Company response team will be made in accordance with existing Notification Procedures (Refer Section 2.0). Initial assistance will include on-duty operators, technicians, and administrative personnel.

The Qualified Individual (QI) will be an English-speaking representative of Lone Star NGL Mont Belvieu L.P. The positions of Qualified Individual, Incident Commander, and Emergency Coordinator are functionally equivalent and their responsibilities are described in this Section. The QI will be available for responding on a 24-hour basis. When responding to an incident, the QI has the following responsibilities:

Initial Response Responsibilities - The QI will activate Lone Star NGL Mont Belvieu L.P.'s Emergency Plan (Refer to Volume I, Section 3.0) by first mobilizing and dispatching Company first responders. The QI also has the authority to call upon contract Oil Spill Removal Organizations (OSROs) which are currently under open contract with Lone Star NGL Mont Belvieu L.P.. The QI is responsible for assuring that the necessary personnel and equipment needed to respond to an incident are on-scene within the required response times. Proper identification of the character and exact location of a leak, the estimated quantity of product released, and the extent of the release are to be conveyed to responders by the QI during the initial response activities.

Notification Responsibilities - The QI will notify and provide the necessary information to the appropriate federal, state, and local authorities. These authorities include, but are not limited to, the National Response Center, the State Emergency Response Commission, and the Local Emergency Planning Committee.

Assessment Responsibilities - The QI will assess the interaction of the spilled substance with water and/or other substances stored at the facility. The QI will assess and promptly implement actions to contain and remove the substance released. Assessments will be made based on possible hazards to human health and the environment due to the release.

Coordination with FOSC/OSRO and Response Personnel - The QI will act as liaison to both the Federal On-Scene Coordinator (FOSC) and the OSROs. When necessary, the QI may authorize the funding of oil spill response activities. The QI will coordinate rescue and response actions as previously arranged with all response personnel.

The QI shall direct cleanup activities until properly relieved of these responsibilities.

Communications

Communication systems utilized by Lone Star NGL Mont Belvieu L.P. include both telephone and radio systems. Where communications services do not exist at the scene of an emergency, communications shall be established as soon as possible, utilizing whatever system is most quickly attained. During an emergency, communications regarding the emergency shall have priority over all other communications on Lone Star NGL Mont Belvieu L.P. owned, operated and dedicated communication circuits.

Telephone Communications – The primary method of communication is the telephone. For spills and emergencies the following phone numbers can be used:

- Lone Star NGL Mont Belvieu L.P. Corporate Office (ETC Houston Pipeline Control): **1-800-392-1965**
- Products Pipeline Control Room : **1-866-935-6277**

The Pipeline Control Center has the means to communicate with each facility along the system via telephone or Company radio. The Secondary Control Point, located at Mont Belvieu South Terminal, has the same capabilities as the Pipeline Control Center.

In the event of phone failure, notify a supervisor immediately and contact the appropriate local phone company or long-distance carrier for repair as soon as possible.

Radio Communications – Radios are used as a back-up system for telephone communications as well as the primary means of communicating with field personnel. This system-wide radio network is based on a commercial system. Select facilities and personnel have satellite phones.

Regional management and maintenance vehicles are equipped with both mobile phones and radios. Hand held units are to be utilized by response personnel on the scene of any spill or accident to assure constant communications with the QI or Alt QI, Federal OSC, the Spill Management Team, and the OSRO. In the event of a failure of the radio system, personnel are required to report the problem immediately to a supervisor and the communications carrier, if applicable.

Spill Reporting Procedures

All Lone Star NGL Mont Belvieu L.P. personnel discovering a spill or potential spill will perform the seven emergency response actions listed above under Notification Procedure after immediate safety concerns are addressed. Lone Star NGL Mont Belvieu L.P.'s Emergency Plan outlining these safety measures is found in Section 3.0 – Spill Detection and Mitigation Procedures. All Lone Star NGL Mont Belvieu L.P. personnel have the responsibility of contacting his/her immediate supervisor and the Pipeline Control Center to begin or speed-up the Emergency Notification process, as described above under Notification Responsibility. (Refer to Section 5.0 – Notification Telephone Directories).

The QI or his/her designee will begin, as soon as safely possible, notifying the National Response Center and all other appropriate agencies, organizations, or personnel listed on the Emergency Notification Phone List for each facility/county in the Response Zone Appendix (Section 5.0 – Notification Telephone Directories). The QI or his/her designee will notify the appropriate regulatory authorities. For internal reporting purposes, the QI or his/her designee will also begin completing Lone Star NGL Mont Belvieu L.P.'s Spill Report Form as soon as practical (within 24 hours of the incident).

Accident Reporting Procedures

To meet Department of Transportation's (DOT's) reporting requirements pertaining to telephonic notice of certain incidents, the following procedures shall be used. (Please note that these procedures are from Lone Star NGL Mont Belvieu L.P.'s Operations & Maintenance (O&M) Manual).

Reporting Accidents – An accident report is required for each failure in a pipeline system where there is a release of the hazardous liquid transported resulting in any of the following:

1. Explosion or fire not intentionally set by the operator,
2. Loss of five (5) gallons or more of liquid except that no report is required for a release of less than 5 barrels resulting from a pipeline maintenance activity if the release is:
   a. Not otherwise reportable under 195.50
   b. Not one described in 195.52(a)(4)
   c. Confined to company property or pipeline right-of-way; and
   d. Cleaned up promptly;
3. Death of any person,
4. Personal injury requiring hospitalization
5. Estimated property including the cost of cleanup and recovery, value of lost product and damage to the property of the operator, or others, or both, exceeding $50,000.

NOTE: A written transcript of the telephonic report message is to be maintained in the Accident File by the Corporate System Integrity Department for the life of the system.

Telephonic Notice of Certain Accidents – Immediate intra-company notification is to be made when a system operational failure or other type of accident occurs. For a list of individuals to contact refer to Section 5.0 – Notification Telephone Directories. This will allow immediate evaluation and classification of accidents and allow immediate telephonic notification to the **National Response Center (NRC) - 800-424-8802**, of any failure that:

1. Caused a death or a personal injury requiring hospitalization;
2. Resulted in either a fire or explosion not intentionally set by the operator;
3. Caused estimated property damage, including the cost of cleanup and recovery, value of lost product and damage to the property of the operator or others, or both, exceeding $50,000;
4. Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines; or
5. In the judgment of the operator was significant even though it did not meet the criteria of any other paragraph of this section (49 CFR 195.52).

For the purpose of this procedure, immediate reporting means, the individual who has knowledge of the event must report it to their immediate supervisor after every effort is made to control the release and it is safe to do so, but not more than 30 minutes after the event has occurred, of an actual or suspected leak, an uncontrolled release of product, or any unplanned spill or other pipeline system failure shall mean. Information that causes any employee to reasonably suspect a leak or uncontrolled release of product must be immediately reported, even when the actual existence or location of a leak or release cannot yet be confirmed. All unplanned spills or releases of product and LPG's occurring outside Lone Star NGL Mont Belvieu L.P. property are to be reported. All unplanned releases of product of LPG's greater than five (5) gallons (unless local or state spill reporting requirements set a lover reporting threshold) occurring inside Lone Star NGL Mont Belvieu L.P. property are to be reported. State and federal reporting requirements, which are less than five (5) gallons, will also be reported to respective agencies, as required. For example, any product causing a sheen on a navigable waterway which is significantly less than five (5) gallons must be reported to local, state, and federal agencies and requires an internal Lone Star NGL Mont Belvieu L.P. Environmental Event Report.

SECTION 3.0 SPILL DETECTION AND MITIGATION PROCEDURES

Subsection ***Page Number***

Methods of Initial Discharge Detection 3-1
Emergency Plan 3-2
On-Scene Spill and Incident Mitigation Procedures 3-11

SPILL DETECTION AND MITIGATION PROCEDURES

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

[redacted]

Aerial patrols are typically performed at intervals not exceeding 3 weeks, but at least 26 times per year. The pilot / observer shall notify Lone Star NGL Mont Belvieu L.P. personnel of all problems or potential problems observed on each line section flown.

Continuing secondary surveillance is accomplished by Operation's Department Managers (both Region and Corporate) through continuing review of all pipeline records and reports (i.e., Field Investigation, Corrosion Control, Daily Operating Performance data) and initiating immediate action to prevent spills and correct hazardous conditions.

On-scene observation is accomplished utilizing regulatory-mandated and Company-implemented inspections, drills and surveys by Lone Star NGL Mont Belvieu L.P. operations and maintenance personnel. Valve inspections, pressure control device inspections and navigable waterway inspections are performed in accordance with requirements established to comply with federal and state regulations. One-call inspections and information-giving activities are performed as needed to ensure the integrity of Lone Star NGL Mont Belvieu L.P.'s pipeline systems is maintained. Lone Star NGL Mont Belvieu L.P. conducts internal Emergency Response Drills and also participates in industry and applicable regulatory agency sponsored emergency response drills. On-scene observation can also be performed by non-Lone Star NGL Mont Belvieu L.P. personnel, whether other pipeline / utility company personnel or the public, who may come across a problem and report it to Lone Star NGL Mont Belvieu L.P.'s 24-hour emergency number (posted on all pipeline markers). Corrosion control surveys are performed by Lone Star NGL Mont Belvieu L.P. personnel. Data from these surveys are documented on Corrosion Control Records for review and regulatory mandated retention.

Emergency Plan

The Company Emergency Plan shall be implemented in the event of an emergency to provide for the safety of the general public and company personnel, protect property from damage and maintain continuity of service. This Emergency Plan outlines the Pipeline Emergency Procedures and Abnormal Operations Procedures found in the Operations and Maintenance Manual. These procedures are reproduced below.

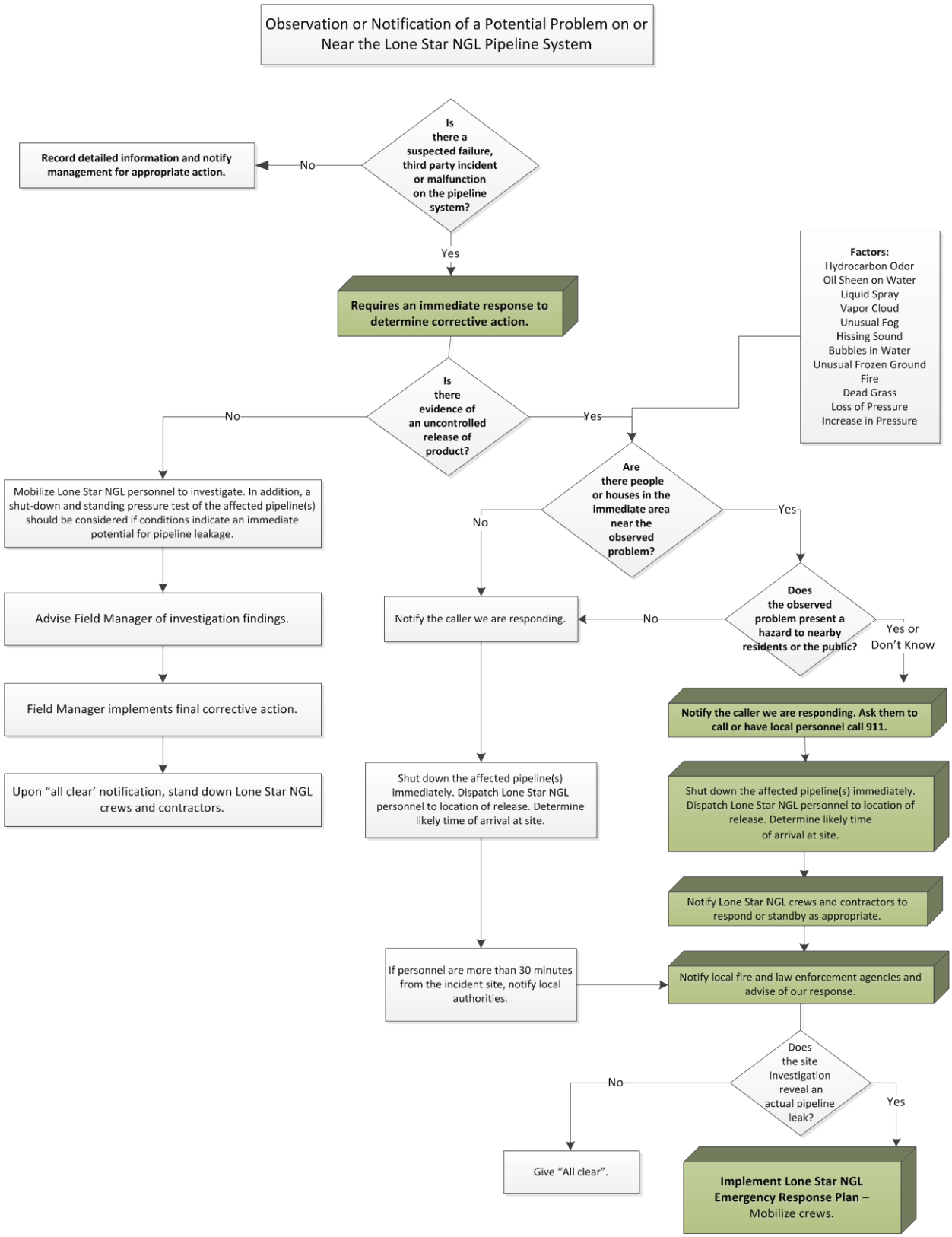
Additional procedures may be required for portions of complex facilities that are regulated by multiple agencies or have additional contingency planning requirements due to facility operations or type. Those procedures are found or referenced (as appropriate) in the Response Zone Appendix – Volume II for the affected facility. Some examples of incidents or circumstances that may result in emergencies on the system are as follows:

1. Ruptured or damaged pipeline or pipeline components.
2. Accidental release of hazardous liquid.
3. Failure or damage to product handling or control equipment in stations, terminals or other facilities.
4. Fires or explosions.
5. Tornadoes, hurricanes, flooding, heavy snows, or other major weather occurrence.
6. Land subsidence or earthquake.
7. Riot, civil disturbance, sabotage, vandalism, or bomb threat.
8. Extensive power or communications failure.
9. Injury, death, or imminent danger to employees on duty.

It shall be the policy of Lone Star NGL Mont Belvieu L.P. to treat the failure or malfunction of any of its facilities as a potential hazard to the public and respond immediately. The type of response will depend on the nature of the failure or malfunction and the particular circumstances involved. Every Lone Star NGL Mont Belvieu L.P. Operation's Department employee has the full authority and responsibility to shut down any and all pipeline operations if, in their sole discretion, such a shutdown is a prudent response to a reasonably likely or an actual emergency. Primary concerns of employees in making such decisions, in their order of priority, are as follows:

1. Public Safety
2. Employee Safety
3. Protection of the Environment
4. Equipment Safeguard
5. Quality of Operations or Facilities
6. Cost or Economics

An operator will categorize an observation or a notification of a potential problem in accordance with the following flow sheet and written procedure:


Observation or Notification of a Potential Problem on or Near the Lone Star NGL Pipeline System
Is there a suspected failure, third party incident or malfunction on the pipeline system?
No
Record detailed information and notify management for appropriate action.
Yes
Requires an immediate response to determine corrective action.
Factors:
Hydrocarbon Odor
Oil Sheen on Water
Liquid Spray
Vapor Cloud
Unusual Fog
Hissing Sound
Bubbles in Water
Unusual Frozen Ground
Fire
Dead Grass
Loss of Pressure
Increase in Pressure
Is there evidence of an uncontrolled release of product?
No
Yes
Mobilize Lone Star NGL personnel to investigate. In addition, a shut-down and standing pressure test of the affected pipeline(s) should be considered if conditions indicate an immediate potential for pipeline leakage.
Advise Field Manager of investigation findings.
Field Manager implements final corrective action.
Upon "all clear' notification, stand down Lone Star NGL crews and contractors.
Are there people or houses in the immediate area near the observed problem?
No
Yes
Notify the caller we are responding.
Does the observed problem present a hazard to nearby residents or the public?
No
Yes or Don't Know
Notify the caller we are responding. Ask them to call or have local personnel call 911.
Shut down the affected pipeline(s) immediately. Dispatch Lone Star NGL personnel to location of release. Determine likely time of arrival at site.
Shut down the affected pipeline(s) immediately. Dispatch Lone Star NGL personnel to location of release. Determine likely time of arrival at site.
Notify Lone Star NGL crews and contractors to respond or standby as appropriate.
If personnel are more than 30 minutes from the incident site, notify local authorities.
Notify local fire and law enforcement agencies and advise of our response.
Does the site Investigation reveal an actual pipeline leak?
No
Yes
Give "All clear".
Implement Lone Star NGL Emergency Response Plan – Mobilize crews.

On-Scene Spill and Incident Mitigation Procedures

Once an emergency is identified, employees located at the scene, or the first employees to arrive at the scene, shall take three basic and necessary actions, ***Control-Notify-Contain.*** The employee should take action to eliminate, isolate, or minimize conditions causing or contributing to the emergency situation; ensure that immediate and proper notification is initiated; and take steps to prevent possible further injury, damage or spread of petroleum liquids. Some possible actions that may be taken are as follows:

1. Eliminate or control product escape or leakage by closing valves, blowing down, or other means.
2. Once necessary actions are taken to control a situation, ensure the Accident Reporting Procedures (Refer to Section 2.0) are ***immediately*** implemented.
3. Evacuate employees and/or public from premises that are, or may be affected.
4. Block off the area or restrict unauthorized access, insofar as possible.
5. De-energize, or arrange to have de-energized, live electrical circuits creating a hazard.
6. Utilize available fire extinguishing equipment as necessary.
7. Eliminate possible sources of ignition and/or take precaution to prevent accidental ignition within the area of hazard.
8. Administer first aid as necessary.
9. Request, fire, police, or medical help.

Every Lone Star NGL Mont Belvieu L.P. Operations Department employee with actual knowledge of an emergency, following initial actions necessary to control the situation shall be responsible for ensuring that the Accident Reporting Procedures (Refer to Section 2.0) are *immediately* implemented.

The statement *"Time 2500"* shall be used as a request for immediate assistance to any employee working alone when he is confronted with an emergency requiring help. When an employee calls on the telephone or radio identifying his location and uses the statement *"Time 2500"*, immediate assistance shall be dispatched to the location. Should a station location miss a scheduled pressure report, and repeated calls from the Pipeline Operator are not answered, the Pipeline Operator shall immediately notify the Region Office which shall dispatch someone to investigate.

In the event of emergencies on the system or localized emergencies, continuity of management shall be maintained. When continuity of management cannot be maintained due to communications failure or other extenuating circumstances, the highest level of management, field supervision, or employee immediately available will assume supervision and control as necessary. This individual shall take whatever measures are prudent and necessary, as dictated by the urgency and nature of the emergency situation, until communications can be restored with higher management. Each Lone Star NGL Mont Belvieu L.P. Operation's Department employee has the full authority and responsibility to shut down any and all pipeline operations if, in their sole discretion, such a shutdown is a prudent response to a reasonably likely or an actual emergency.

When stations or other manned facilities are isolated as a result of communications failure and/or inaccessibility, the facility shall continue to operate in accordance with the last standing order, as long as operating variables (e.g., pressures, volumes, temperatures, etc.) remain within the normal range of operations. The facility shall continue to operate in this manner until communications are restored or changes in operating variables indicate that shutdown of the facility or other action is necessary.

Where communications service does not exist at the emergency location (e.g., at a pipeline failure), communications shall be established as soon as possible using mobile or portable base radio units, nearest available telephone service or other possible means. In the event of a communications failure at locations having communications facilities, communications shall be re-established by the most expedient means available, including relay by mobile radio units if necessary. Since telephone lines are likely to be jammed or inoperative during many emergency situations, radio communications will be essential and, the use of these facilities should be confined only to matters pertaining to the emergency situation.

Emergencies on the system that affect the continuity of product flow in the system shall be reported immediately to the Pipeline Control Center and Region management. Customers shall also be notified if the emergency may involve facilities that deliver products to them. The Pipeline Operator shall report the emergency to the Regional Management. Regional management will notify the Vice President – Operations or the Manager – DOT/Compliance. The Vice President - Operations will notify other appropriate Company Departments affected.

The Vice President - Operations shall be responsible for placing the Emergency Plan in action in the event of a national emergency or major emergency affecting the security and integrity of the entire system.

Emergencies on the system that do not affect the continuity of product flow in the system or service to a shipper, shall be reported to the local management through established organization channels. Local management will report to the appropriate Superintendent or Department Head who will advise all others concerned.

Local authorities or services such as County Emergency Management Officers (EMOs), fire departments, law enforcement agencies, medical or ambulance services, telephone company (for restoration or addition of communications service), electric power company, etc. shall be notified as required and with the expediency as warranted by the nature of the emergency.

(b) (7)(F), (b) (3) [redacted]

Each Station and Terminal shall be provided with maps or drawings that show the piping arrangement. Field Managers, Pipeline Operators and Maintenance Supervisors shall be provided with maps of the pipeline system for the area for which they are responsible. Maps or drawings shall show the location of principal valves that would be required to close off, control, or flare the product in the event of an emergency involving the product flow. Maps or drawings shall be maintained sufficiently current to show any changes or modifications in the valve or piping arrangement that would affect the handling of product flow.

Pipe and fittings of various sizes and types as may be required to affect repairs to the main line piping system in the event of an emergency shall be maintained on hand at strategic locations along the pipeline system. The stock level of these materials shall be maintained at a sufficient level to ensure the availability of materials required to make repairs to the piping system as necessary to restore service, as expediently as possible.

Personnel, work equipment, and repair materials that may be required in the event of an emergency shall be dispatched to the scene as expediently as possible in keeping with the nature of the emergency. Particular consideration should be given to the need for any special equipment or tools required due to particular circumstances. These may include: portable electric generators for night work or communications power, portable pumps for flooded or rainy conditions, timber matting for work equipment or vehicle support or access, insulated tools for electric work, portable base radio unit, "walkie-talkie" radio units, leak and hazardous atmosphere detectors, air compressors, leak clamps, detector device for locating underground facilities, tarpaulins, emergency fuel, barricades, flares, portable flood lights, extension cords, etc.

As soon as reasonably possible after employment or transfer, all operating and maintenance employees shall receive indoctrination to acquaint them with the Emergency Plan. Emergency procedures shall be reviewed with appropriate operating and the technical staff from time to time at safety meetings or other group meetings. All employees shall be made aware of the need for educating shippers and the general public along the route of the pipeline in how to recognize and report an emergency and the importance of utilizing all opportunities to accomplish and further such an education process.

It is necessary to have the Company name and a telephone number available to the general public when individuals report an emergency along the pipeline route. In addition to normal pipeline markers and signs identifying facilities, the name and telephone number shall be made available through printed information disseminated to property owners, public officials (including fire and police officials), customers, contractors, and others in the form of business cards or other printed format.

Pipeline Operator s shall be available twenty-four (24) hours a day to receive and handle calls from shippers, the public and other companies as well as Company personnel.

Liaison with public officials along the pipeline system, including fire and police officials, shall be established with respect to emergency procedures by personal or telephone contact along with dissemination of business cards and other printed information.

The Public Relations Department shall be consulted on situations involving dissemination of information to the news media.

It shall be the responsibility of the Director of Operations to see that appropriate personnel are acquainted with emergency procedures and that a liaison is established with appropriate public officials, including fire and police officials. The Director of Operations shall be responsible for educating shippers and the general public along the route of the pipelines so that they will know how to recognize and report an emergency.

A record shall be maintained of the initial indoctrination of all appropriate operating and maintenance personnel to make them acquainted with the emergency procedures. Subsequent reviews of emergency procedures should be noted in the minutes of safety meetings or other group meetings.

Early detection of spills or potential emergency situations is accomplished through observations of abnormal operations. The following outlines actions to be taken by the field operators or pipeline operators when abnormal operations are noticed at terminals, booster stations, and sections of the pipeline. These are general procedures that apply to the entire system. Facility specific information for individual terminals is located in the Response Zone Appendix – Volume II, as needed.

FIELD OPERATORS OR PIPELINE OPERATOR

I. EMERGENCY - TERMINAL

A. Pressure Variation
   1. Incoming Pipelines
      a. Pipeline Operator I notifies the Pipeline Operator
      b. Notify Supervisor.
      c. Check with origin point for possible reason.
      d. Check flow rate of stream for possible change.
      e. Check accuracy of pressure indication instruments.
      f. If logical reason for pressure variation cannot be determined, notify origin point, Pipeline Control Center, and proceed with an orderly shut down on the incoming line.
      g. Catch normal shutdown pressure on-line (i.e., pressure maintained on pipeline after shutdown).
      h. Monitor pressure for indication of leak in line.
      i. Do not catch more pressure on the line than normal shut down pressure.
      j. In case of a loss of pressure on the closed in line, do not re-pressure.
      k. Coordinate all information with the Pipeline Control Center.
      l. Report all information to the Supervisor. If available information indicates a leak or uncontrolled release of products, immediately begin Accident Reporting procedure (Refer to Volume I, Section 2.0).

m. Do not open or start the pipeline back up until a solution to the problem has been found.

2. Outgoing Pipelines
   a. Pipeline Operator I notifies the Pipeline Operator.
   b. Notify Supervisor.
   c. Check the suction line-up, booster pumps and main line pump for possible malfunction.
   d. Check the booster stations and delivery point(s) for possible changes.
   e. Check accuracy of pressure indication instruments.
   f. If no immediate solution to the problem can be found, begin taking the line down in an orderly fashion.
   g. If time permits, notify the Pipeline Operator and all operators concerned that the pipeline is going down - stop the origin station first and allow the booster stations to go down on low suction.
   h. Coordinate all information with Pipeline Control Center.
   i. Report all information to the Supervisor. If available information indicates a leak or uncontrolled release of product, immediately begin Accident Reporting procedure (Refer to Volume I, Section 2.0).
   j. Do not open or start the pipeline back up until a solution to the problem has been found.

B. Product Loss
   1. By Hourly Checks
      a. Pipeline Operator I notifies the Pipeline Operator.
      b. Notify Supervisor.
      c. If time permits, check for mathematical errors.
      d. Start getting simultaneous barrel checks every few minutes from all points involved - use more than one method of measurement if possible.
      e. If shortage cannot be explained, shut the pipeline down immediately using normal shut down procedures and catching a normal shut down pressure.
      f. Keep the Pipeline Operator and Supervisor advised on all operations. If available information indicates a leak or uncontrolled release of product, immediately begin Accident Reporting procedure (Refer to Volume I, Section 2.0).
      g. Do not start the line back up until a solution to the shortage problem has been found.
   2. Detected by Visual Means or by Notification by Others
      a. If time permits, notify the Pipeline Operator and Supervisor.
      b. Shut down equipment and isolate that part of the system from which the product could be escaping.
      c. Eliminate the source of ignition
      d. If possible, drain or suck the product out of the affected area into sumps or tankage.
      e. If possible, flood the affected pipe or container with an inert material (i.e., nitrogen or water).
      f. Notify any persons that might be in imminent danger from the escaping product. Immediately implement Accident Reporting procedure (Refer to Volume I, Section 2.0).
      g. If damage is possible to people or property other than Lone Star NGL Mont Belvieu L.P., then notify any local civil groups such as County Emergency Management Office, fire departments, law enforcement, etc.
      h. Secure the surrounding property so outsiders cannot get to the affected area.
      i. Do not enter the affected area until all escaping product is under control.
      j. Do not start any equipment or product movement back up until all escaping product has been secured, the area checked thoroughly for vapors, and the whole installation is back to normal conditions.
      k. Keep the Supervisor and the Pipeline Operator advised of all activities as often as possible.

C. Fire
   1. Tank
      a. If time permits, notify the Pipeline Operator and Supervisor.
      b. Local fire departments and police agencies should be called immediately.
      c. Ensure that the Accident Reporting procedure (Refer to Volume I, Section 2.0) has been

initiated.
   d. If the fire is coming from the vents - as is often the case - and is not too intense, then the vents should be closed on tanks equipped to do so.
   e. If any streams are working into the tank, they should be shut down immediately.
   f. Product should be emptied from the tank by taking suction with existing pumps.
   g. Surrounding tank vents should be closed.
   h. Fire wall drains should be checked to ensure that they are closed.
   i. Water should be sprayed on nearby tanks or any other material that might ignite.
   j. The entire area should be closed off or secured until the fire is out or the emergency is under control.

2. Pipeline
   a. If time permits, notify the Pipeline Operator and Supervisor.
   b. Shut down equipment and isolate that part of the system from which the product could be escaping.
   c. Ensure that the accident reporting sequence has been initiated.
   d. Each individual will respond to a fire fighting event to the level of training they have received.
   e. If the fire is brought under control, begin immediately to eliminate any source of re-ignition - such as by cooling "near by iron" with water.
   f. If possible, drain or suck the product out of the affected area into sumps or tankage.
   g. If possible, flood the affected pipe with an inert material, i.e. nitrogen.
   h. If damage is possible to people or property, other than Lone Star NGL Mont Belvieu L.P., then notify any local civil groups such as fire departments, law enforcement, etc.
   i. Secure the surrounding area so outsiders cannot get to the emergency area.
   j. Keep the Pipeline Operator and Supervisor advised of all activities as often as possible.

D. Other

1. Acts of Nature
   a. For most Acts of Nature that result in creating an emergency situation, there will be sufficient warning from local weather bureaus, etc., so that precautions can be taken to guard against flooding, high winds, etc.
   b. Drainage ditches must be kept clear of obstructions.
   c. Tank fire wall drains must be checked.
   d. In cases of extreme high heat, tanks need to be checked for volumes of product in them.
   e. If roads are expected to be closed, preparations will have to be made for personnel to remain at designated facilities that will be manned.
   f. Preparations need to be made in the event of loss of power and communications.
2. Acts of Violence
   a. Here again, advance notice of a possible emergency of this type from local law enforcement agencies may occur.
   b. Extra personnel may need to be called out to help watch all areas secured.
   c. All fences and gates need to be checked and secured.
   d. All lighted areas need to be checked to be sure that all lights are working.
   e. Fire fighting equipment and supplies need to be checked.
   f. Pipeline Operator s, Supervisors and law enforcement agencies need to be kept informed at all times.
   g. Total Loss of Communications, discussed above in this Emergency Plan.

II. EMERGENCY - BOOSTER STATION

One of the very first things to do would be notify the local operator. There would be only minor variations in emergency procedures for booster stations as compared to the ones listed for terminal locations.

Reference Part I. Emergency -Terminal, Sections:

A. Pressure Variations
B. Product Loss

C. Fire
D. Other

III. EMERGENCY - PIPELINE

Reference Part I. Emergency - Terminal, Sections:

A. Pressure Variations
B. Product Loss
C. Fire
D. Fire - Intentional Ignition of LPGs

The first Company representative to arrive at site of LPG outage should:

1. Ensure that Accident Reporting procedure (Refer to Volume I, Section 2.0) has been initiated.
2. Approach site on foot with caution from upwind if possible.
3. Stop or reduce leakage if safe means readily available.
4. If leak is not on fire, assess the extent and coverage of the vapor cloud and determine the hazardous areas.
5. Determine wind direction and approximate velocity.
6. Move downwind of vapor cloud and determine if vapor will move into areas containing people, animals, dwellings or will likely drift across any roads.
7. If vapor cloud is moving toward inhabited areas, alert all people to evacuate immediately along a route that will avoid or minimize damages to them. If law enforcement or fire personnel are present, ask them to assist in this evacuation. Also block all traffic on roads near the vapor cloud path.
8. If there are no people in immediate danger from vapor cloud but movement of cloud is toward inhabited areas or if approaching darkness could endanger people, then intentional ignition of vapor cloud should be undertaken.
    (a) Notify Supervisor and the Pipeline Operator if time allows.
    (b) Notify law enforcement and fire department personnel on the site of your intentions.
    (c) Advise fire department that they may extinguish local fires away from leak source but fire at source should not be extinguished.
    (d) Move well upwind of vapor cloud and ignite by use of flare gun or other suitable means.
9. Under certain weather conditions, butane and other low vapor pressure LPGs may remain as a liquid. In this event use spill booms, dikes or other suitable means to prevent liquid from draining into streams, ditches, sewers, or any place where accidental ignition could prove hazardous to life and property.

E. Fire - Intentional Ignition of Conventional Products.
    1. Ensure that the Accident Reporting procedure (Refer to Volume I, Section 2.0) has been initiated.
    2. Under most circumstances it will not be necessary to ignite conventional products that have been spilled due to pipeline leaks, however there are special circumstances where intentional ignition should be initiated;
        a. When higher vapor pressure conventional products such as gasoline are spilled in an area that would allow vapors to flow across roads, railroad tracks, or into inhabited areas where accidental ignition is possible.
        b. Where liquid products might drain into sewers or other underground drains.
        c. If Liquid product drains into a body of water where accidental ignition would endanger people, vessels, docks or other facilities.
    3. If it becomes necessary to ignite conventional products these steps should be followed:
        a. Notify Supervisor and the Pipeline Operator of your intent should time permits.
        b. Notify law enforcement and fire department personnel present of your intentions.

c. Move upwind of vapors and product and ignite with flare gun or other suitable means.
d. Advise fire personnel that they may extinguish all fires except the one at leak source and any product burning that cannot be contained.

Return to safe condition after consultation with your Supervisor and the Pipeline Control Center, notify law and fire department personnel present when condition is contained and population may resume normal activities in area as indicated.

F. Other
1. Acts of Nature (Basically same procedures as for Terminals).
2. Acts of Violence (Basically same procedures as for Terminals).
3. Total Loss of Communications, discussed above in this Emergency Plan.
4. Third Party Damage Report, discussed above in this Emergency Plan.

IV. REPAIRS

All repairs following an emergency shall be conducted utilizing the necessary equipment, trained personnel aware of and familiar with the hazards to public and personnel safety and appropriate repair materials. The repair plan shall utilize the information contained in API Publication No. 2200, Repairing Crude Oil, Liquefied Petroleum, Gas ,and Products Pipelines.

On-Scene Spill and Incident Mitigation Procedures

During operations, Lone Star NGL Mont Belvieu L.P. personnel must follow procedures to prevent spills or incidents from occurring. In the case of a spill or incident, steps will also be taken to mitigate the effects and minimize the possibility of recurrence. The following describes the procedures taken to investigate failures and prevent accidental ignition.

Investigation of Failures – All operational failures and accidents involving facilities will be investigated and analyzed for the purpose of determining the cause and to minimize the possibility of a recurrence.

A written report, supplementing the prescribed report forms, must be made by the Operation's Department Field Supervisor investigating a failure or accident, when requested by the Vice President - Operations. Such report will include as much information as possible and will include photographs, sketches, measurements and any other available data that may be pertinent.

Sufficient information and data must be obtained on each failure or accident that occurs so that the information required by 49 CFR 195 Subpart B can be furnished should the nature and/or scope of the incident require that it be reported. This information will be forwarded to the Vice President - Operations for forwarding to the Corporate Regulatory Compliance Department for notification to the proper agencies.

When it is possible to salvage materials that can be utilized in a laboratory analysis in an effort to establish the possible cause of the failure or accident, such materials will be salvaged. Care will be taken to preserve these materials in their existing condition so as not to impair their analytical value. A laboratory analysis and/or metallurgical examination of the failed specimen will be initiated when it is deemed necessary. A full report on the findings of the analysis or examination will be prepared by the laboratory firm.

Information gained by investigation and analysis of failures or accidents will be considered and utilized insofar as possible to prevent a recurrence of failures or accidents from the same cause.

Responsibility: It is Director of Operations's responsibility to see that each failure or accident involving pipeline facilities is investigated by a Field Supervisor, the necessary reporting information is obtained, a full report is made, and a specific specimen is obtained for laboratory analysis when requested. The Director of Operations is responsible for disseminating information that may be helpful in preventing a recurrence of a failure or accident from a similar cause.

Records: These Company forms, as appropriate, are required following a failure or accident:

Field Investigation Report

Report of Pipe & Coating Inspection

These reports will be supplemented by a written report when requested by General Office Management. A full report will be prepared when a laboratory analysis is performed. All records of failures or accidents will be retained in the Region and General Offices for the life of the system.

Prevention of Accidental Ignition – Lone Star NGL Mont Belvieu L.P. personnel will operate facilities in such a manner as described below to prevent accidental ignition. These procedures also apply to contractors and visitors to Lone Star NGL Mont Belvieu L.P. facilities and the pipeline rights-of-way.

Procedure: Smoking is prohibited in all pump station areas, terminal areas, breakout tank areas, rail and truck loading rack areas or on any pipeline facilities where the possible leakage or presence of liquid petroleum or vapors constitutes a hazard of fire or explosion. "No Smoking" signs shall be installed at an appropriate distance from any such facility or work area (ditch) or on the facility fence.

"Smoking Permitted Here" signs will be installed at locations where no hazard of fire or explosion exists,

such as office, warehouse, garage or Control Room areas. Smoking shall be permitted only where these signs are posted.

Prior to welding or cutting with a torch, in or around a structure or area containing pipeline facilities, a thorough check, using an explosive gas indicator, must be made to determine the possible presence of a combustible gas mixture or flammable liquid. In addition, ample fire extinguishers must be manned and ready for use. Welding and/or cutting will begin only when safe conditions are indicated and fire extinguishers are manned. Fire extinguishers must be manned until welding is completed.

When welding or torch cutting of a pipeline is to be undertaken anywhere on the pipeline rights-of-way, temporary "No Smoking" signs must be installed at a "safe distance" (wind direction must be taken into consideration) from the work area (ditch) where the welding and/or cutting is to take place. No smoking within 100 feet of the area must be strictly adhered to. Fire fighting equipment must be manned and ready for use during all cutting and welding operations where the possibility of fire or of a combustible gas mixture exists.

When temporary welding sheds or shelters are erected on pump station property or at other facilities, as is sometimes done during major maintenance projects, the shelter must be installed outside the "No Smoking" area.

Flashlights, hand lanterns or any other hand lights for use in areas where liquid petroleum or other combustible mixtures may be present must be of a type approved for use in a hazardous atmosphere. All such lights must be maintained in accordance with the manufacturer's instructions.

When a pipeline under cathodic protection from a rectifier unit is to be separated, the electrical power supply to the unit must be shut off and a bonding conductor installed across points where the pipeline is to be separated and the bond maintained while the pipeline is separated. Special consideration must be given to the prevention of other means of accidental ignition. This shall include but not be limited to the following:

1. Use of non-explosive and non-sparking tools in hazardous areas.
2. "Permit only" required personnel, vehicles and work equipment in hazardous work areas.
3. Avoid unnecessary running of vehicles and equipment within hazardous areas.
4. Avoid the use of any radios in hazardous areas.
5. Leave smoking materials outside the hazardous areas.
6. Exercise precautions during cutting, welding, grinding and filing pipelines that could possibly contain an explosive liquid petroleum air mixture.
7. Exercise precautions during scraper running operations, particularly inserting and removing scrapers.
8. Exercise precautions in use and handling of flammable liquids.
9. Exercise precautions in excavating, lowering and repairing pipelines in service.
10. Consideration of possible ignition created by static electricity in hazardous areas.
11. NACE RP-01-77-Mitigation of Alternating Current and Lightning Effects on Metallic Structures and Corrosion Control Systems must be used for additional guidance.

Responsibility: The Manager – DOT/Compliance is responsible for establishing procedures for the prevention of accidental ignition. The Director of Operations is responsible for assuring that the procedures are followed in the field. The Safety Coordinators are responsible to insure that all employees are furnished and familiarized with information pertaining to accidental ignition.

Records: No written report required.

SECTION 4.0 COMMAND AND REPORTING STRUCTURES

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Command and Reporting Structures

Introduction

This section outlines the responsibilities of key personnel responding to an incident, including the Qualified Individual/Incident Commander (QI/IC), the command staff, the section chiefs, and Oil Spill Removal Organizations (OSROs). Throughout the discussion of responsibilities there are references to the Lone Star NGL Mont Belvieu L.P.'s Incident Action Plan provided at the end of this section. The key individuals complete their respective portions of the Incident Action Plan to provide a complete record of activities and to organize response activities during the incident. Each section chief is responsible for completing an activity summary and event log as part of the Incident Action Plan.

Also included in this section are discussions of sensitive area identification and protection, spill assessment, identification of locations requiring immediate response, spill containment, removal and recovery, storage and disposal, and safety, health and security. Lone Star NGL Mont Belvieu L.P.'s Site Safety Plan is included in the subsection on safety, health and security.

Personnel Responsibilities

Once an incident occurs, an Incident Command System is put into place, identifying each individual responsible for specific activities. These individuals, as identified on the Incident Command System Worksheet (Figure 4-1), will be responsible for their respective roles until another individual replaces them. This Incident Command System Worksheet is to be completed and updated throughout the response activities. Specific job descriptions for each member of the command staff and the section chiefs are provided below.

The Pipeline Operator I or operator of a facility, upon the determination or notification of an incident, will initiate pre-designated steps for initial control, notification, and containment. The initial steps of control include, but are not limited to, the stopping of pumps and the blocking of appropriate valves and line sections. Initial assistance will include on-duty pipeline operators, maintenance technicians, and administrative personnel.

Incident Command System

Once an incident occurs, an Incident Command System (ICS) is put into place, identifying each individual responsible for specific activities. This ICS is modeled after the National Interagency Incident Management System (NIIMS). These individuals, as identified on the ICS Worksheet, will be responsible to their respective roles until they are replaced by another individual. The responsibilities of key individuals in the ICS are outlined in this Section. Figure 4-1 is an example of the ICS Worksheet to be completed and updated throughout the response activities. This ICS provides a clear chain of command for incident response activities.

The individuals named in the ICS will follow Lone Star NGL Mont Belvieu L.P.'s Incident Action Plan, found in Section 10.0 - Forms. This Incident Action Plan provides a format by which information is recorded and transferred to the QI.

Qualified Individuals'/Incident Commanders' Responsibilities

The positions of Qualified Individual and Incident Commander are functionally equivalent and their responsibilities are described in this Section. The Qualified Individual/Incident Commander (QI/IC) will be an English-speaking representative of Lone Star NGL Mont Belvieu L.P.. The QI/IC will be available to respond on a 24-hour basis, with full authority to: activate and contract with oil spill removal organizations; activate personnel and equipment maintained by Lone Star NGL Mont Belvieu L.P.; act as liaison with the federal and/or state OSC; and obligate any funds required to carry out all required or direct response activities. When responding to an incident, the QI/IC has the following responsibilities:

Initial Response Responsibilities - The QI/IC will activate Lone Star NGL Mont Belvieu L.P.'s Emergency Plan (Refer Section 3.0) by first mobilizing and dispatching company first responders. The QI/IC has the

authority to call upon contract Oil Spill Removal Organizations (OSROs) which are currently under open contract with Lone Star NGL Mont Belvieu L.P.. The QI/IC will be responsible for assuring that the necessary personnel and equipment needed to respond to an incident are on-scene within the required response times. Proper identification of the character and location of a leak, the estimated quantity of product released, and the geographic extent of the release will be conveyed, to the extent known at the time, to responders by the QI/IC during the initial response activities

The Qualified Individual (QI) will be an English-speaking representative of Lone Star NGL Mont Belvieu L.P.. The QI is the individual who also has the titles of Incident Commander and Emergency Coordinator. All of these positions are functionally equivalent and their responsibilities are described in this Section. The QI will be available for responding on a 24-hour basis. When responding to an incident, the QI is has the following responsibilities:

- Initial Response
- Notification
- Assessment
- Coordination with FOSC/OSRO and Response Personnel

The QIs and their Alternates for Response Zone 1 – Mont Belvieu, Texas are listed below:

Name:	Title:	Responsibility:	Phone Number:
Rusti Beckmann	Field Manager	QI	281-385-3620 Office (b) (6) Mobile
Brad Widener	Director of Operations	Alternate QI	281-385-3571 Office (b) (6) Mobile

*Note: QI = Qualified Individual / Incident Commander / Emergency Coordinator
Alternate QI = Alternate Qualified Individual / Alternate Incident Commander / Alternate Emergency Coordinator

Notification Responsibilities - Notification of the Company response team will be made in accordance with existing Notification Procedures (Refer to Volume I, Section 2.0). As described in the Notification Procedures, initial (primary) emergency notification is the responsibility of the discoverer until his/her immediate supervisor, Director of Operations (QI/IC) or Technical Operations Superintendent (Alt. QI/IC) has been contacted. Upon contact, the immediate supervisor, QI/IC, or Alt. QI/IC will assume all responsibility for subsequent and follow-up notifications. The QI/IC will notify and provide the necessary information to the appropriate federal, state, and local authorities. These authorities include, but are not limited to, the National Response Center, the State Emergency Response Commission, and the Local Emergency Planning Committee.

Assessment Responsibilities - The QI/IC will assess the interaction of the spilled substance with stored water and/or other substances stored at the facility. The QI/IC will assess and promptly implement actions to contain and remove the substance released. Assessments will be made based on possible hazards to human health and the environment due to the release.

Coordination with FOSC/SOSC – Lone Star NGL Mont Belvieu L.P.'s QI/IC will coordinate with the Federal On-Scene Coordinator (FOSC) and/or the State On-Scene Coordinator (SOSC) to establish a Unified Command System. Under a Unified Command System, the federal and/or state Incident Command System (ICS) will be incorporated into Lone Star NGL Mont Belvieu L.P.'s ICS and Lone Star NGL Mont Belvieu L.P.'s QI/IC will be an equal decision maker with the FOSC and SOSC.

Coordination with Response Personnel – The QI/IC will coordinate rescue and response and clean up actions with all response personnel through his/her command staff and the section chiefs. Specific responsibilities of command staff and section chiefs are described below.

Command Staff Responsibilities

Legal/Compliance Officer – The Legal/Compliance Officer is responsible for anticipating any legal actions or regulatory requirements that may result from the incident. The Legal/Compliance Officer will obtain briefing from the QI/IC and provide advice regarding legal and regulatory compliance matters to the QI/IC and other members of the command staff. In addition, this person will interface with federal and or state agency representatives, as directed by the QI/IC.

Safety Officer – The Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. This individual will obtain briefing from the QI/IC and identify hazardous situations and potentially unsafe situations associated with the incident as soon as possible. He/She will oversee the preparation of the Site Safety Plan, as provided at the end of this section. The Safety Officer will correct unsafe conditions and/or acts through the line of authority set up with the ICS and when necessary will exercise emergency authority to stop and prevent unsafe acts. In addition, this person will be responsible for the establishment of hot zones, decontamination areas, and use of correct personal protective equipment.

Liaison Officer – The Liaison Officer is the first point of contact for agency representatives. This individual will obtain briefing from the QI/IC and identify agency representatives and communication links and locations as soon as possible. The Liaison Officer will respond to requests from incident personnel for inter-organizational contacts and monitor incident operations to identify existing or potential problems.

Public Affairs Officer – The Public Affairs Officer is responsible for the formulation and release of information about the incident to the news media and other appropriate organizations and agencies. This individual will obtain briefing from the QI/IC, coordinate public information activities with the jurisdictional agencies, and establish a single incident information center when possible. As soon as possible, the Public Affairs Officer will prepare and initial information summary and obtain approval on the release of information by the QI/IC and Lone Star NGL Mont Belvieu L.P.'s Corporate Legal Department. The Public Affairs Officer will release news to news media and post information in the command post and other appropriate locations.

Historian – The Historian is responsible for maintaining accurate and complete incident files, providing duplication services to response personnel and document planning and briefing meetings. This individual will obtain briefing from the QI/IC as soon as possible and attend all daily planning and briefing meetings. The Historian will develop documentation guidelines for distribution to all response personnel and distribute and collect all log books provided to response personnel.

Section Chiefs' Responsibilities

Planning Section Chief – The Planning Section Chief is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. This information is needed to understand the current situation, predict probable course of incident events, and prepare alternative strategies and control operations for the incident in order to protect the public safety, Lone Star NGL Mont Belvieu L.P. personnel, and the natural environment. This individual prepares the incident briefing and response objectives sections of the Incident Action Plan, as described above and provided at the end of this section. The Planning Section Chief provides periodic predictions on incident potential and compiles and displays a summary of incident status, as needed. He/She establishes contact with the Natural Resource Damage Assessment (NRDA) contractor, when deemed necessary.

Operations Section Chief – The Operations Section Chief is responsible for the management and supervision of all operations directly applicable to the incident. This individual develops and updates the operations portion of the Incident Action Plan, as described above and provided at the end of this section. The Operations Section Chief establishes contact with the Oil Spill Removal Organization (OSRO) and determines the need and requests additional resources, as needed. He/She reports information about special activities, events, and occurrences to the Incident Commander.

Logistics Section Chief – The Logistics Section Chief is responsible for providing facilities, services, and materials in support of the incident. This individual participates in the preparation of the Incident Action Plan, as described above and provided at the end of this section, and insures that the incident communications plan (found in the Incident Action Plan) is prepared. The Logistics Section Chief coordinates and processes requests for additional resources

Finance Section Chief – The Finance Section Chief is responsible for all financial and cost analysis aspects of the incident. He/She participates in all planning sessions for input on financial and cost analysis matters and prepares appropriate sections of the Incident Action Plan, as described above and provided at the end of this section. This individual identifies and orders supplies and tracks the expenditures incurred throughout the incident.

Oil Spill Removal Organization (OSRO) Responsibilities

Lone Star NGL Mont Belvieu L.P. personnel will have first responder responsibilities only. At no time will Lone Star NGL Mont Belvieu L.P. personnel perform oil spill clean-up duties other than initial containment, except for small spills (2,100 gallons or less). Initial containment will be conducted by the First Responder Operations Level individuals as designated in Section7.0. The OSRO(s) personnel will respond throughout a prolonged response.

Lone Star NGL Mont Belvieu L.P.'s emergency response team will function under the ICS. Under ICS, Lone Star NGL Mont Belvieu L.P. has identified the individual who will act as liaison to all OSROs responding to an incident as the Clean-up Operations Leader under the Operations Section Chief. Lone Star NGL Mont Belvieu L.P. will furnish communication equipment to all OSRO lead personnel to ensure continual communication capability. The OSRO is responsible for completing the resource summary sheet, found within the Incident Action Plan. The Lone Star NGL Mont Belvieu L.P. QI/IC will make outside responders aware of pertinent decisions made and information gathered, through communication with UCS operations. Communication will be maintained utilizing communication equipment or local/cellular telephones furnished by Lone Star NGL Mont Belvieu L.P..

A list of all Oil Spill Removal Organizations contracted by Lone Star NGL Mont Belvieu L.P. is found in Section 5.0 – Notification telephone Directories. Details regarding the OSRO's available response equipment and other response resources are found in Section 6.

Sensitive Area Identification and Protection

Early assessment of the trajectory, rate, and duration of a release is critical for implementing actions to prevent oil from entering sensitive areas. The Planning Section Chief will coordinate this assessment and monitor the release by tracking its trajectory on area maps. Based upon the assessment of trajectory, rate and duration of the release, the Planning Section Chief will provide Lone Star NGL Mont Belvieu L.P.'s QI/IC with an analysis of potential impacts to sensitive areas, including, but not limited to public use areas, population centers, water intakes, threatened and endangered species habitats, wildlife management areas, etc. The Planning Section Chief will use the maps of known sensitive areas and the support data found in Volume III – Response Maps as well as any other possible resources of information pertaining to sensitive areas that may be impacted. Should it be determined that a release could potentially impact a sensitive area, every effort must be made to prevent the released product from entering the area.

Once it has been determined that released materials threaten to affect an environmentally sensitive area, Lone Star NGL Mont Belvieu L.P.'s QI/IC will direct the Operations Section Chief to handle the immediate cleanup and continued isolation of as much of the area as possible. The Planning Section Chief will continue to work with the Operations Section Chief in planning these specialized cleanup efforts. The Planning Section Chief will coordinate with resource agency staff and natural resource specialists as needed to determine clean up and isolation operation options with minimal impact to the sensitive areas. The Operations Section Chief will implement those operations deemed most appropriate by the Planning Section Chief.

Natural Resource Damage Assessment (NRDA) – At the request of Lone Star NGL Mont Belvieu L.P.'s Planning Section Chief (with guidance from the Corporate Legal Department), a NRDA response may be initiated as a result of a release event. Once Notification Procedures (refer to Volume I, Section 2.0) have been completed and the decision to initiate a NRDA response is made, Lone Star NGL Mont Belvieu L.P. personnel will begin the initial NRDA response activities. These activities will occur simultaneously with spill cleanup and containment activities. There are two levels of NRDA response activities to occur during spill response: 1) Immediate response activities and 2) Short-term response activities.

The Immediate NRDA Response Checklist (Figure 4-2) provides guidance for actions that may occur

within the first few hours following notification of a spill. Immediate response activities may include:

1. Notification of Lone Star NGL Mont Belvieu L.P.'s NRDA Consultant.
2. Product sampling.
3. Initial sample collection and documentation.
4. Identification of resources "at risk".

Within the first 48 hours after a release Lone Star NGL Mont Belvieu L.P. personnel will, under the direction of the NRDA Coordinator, collect a large sample (several gallons) of the source product. Specific sampling and labeling protocol must be followed, as directed by the Planning Section Chief to ensure the integrity of data for future legal determinations. This sampling effort is extremely important.

The Short-term NRDA Response Checklist (Figure 4-3) provides guidance for those actions that may occur during the first two to three days after a spill has occurred. These activities are primarily related to extended NRDA sampling and documentation.

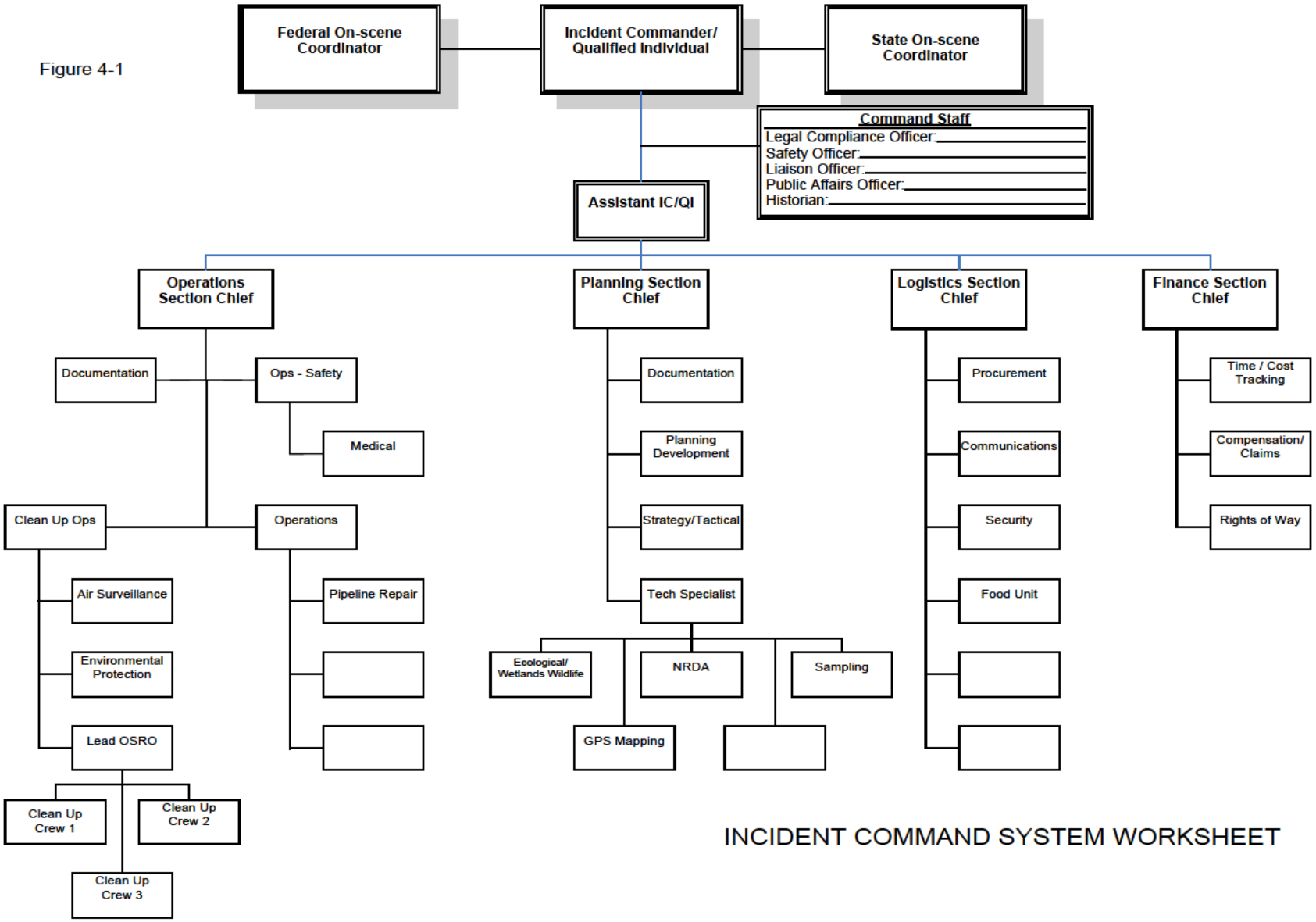
Telephone numbers and contact names for Lone Star NGL Mont Belvieu L.P.'s NRDA contractor are listed in Section 5.0.

Wildlife Protection and Rehabilitation – Section 11.0 – Response Maps includes area maps showing the locations of sensitive areas in relation to pipeline sections and facilities. When responding to a release, responders should take all necessary measures to ensure the protection of known wildlife areas near the scene.

Measures taken to protect areas that contain indicated wildlife populations may include scare tactics to relocate wildlife residents to protected areas. If deemed necessary, by the Planning Section Chief, through consultation with resource agency staff, other arrangements will be made for the temporary removal and relocation of wildlife. Equipment needed for removal or relocation of wildlife will be available through wildlife rehabilitation contractors and government agencies.

In the event that any form of wildlife is contaminated due to a release, the appropriate state parks and wildlife (or natural resources) department and the U.S. Fish and Wildlife Service will be notified. Capture of small numbers of various forms of wildlife will be coordinated through agency representatives. Should large numbers of wildlife be affected by a release, the appropriate State Wildlife Rehabilitation Coalition/Organization will be contacted to help coordinate on-site capture/rehabilitation efforts. Telephone numbers and contact names for wildlife rehabilitation organizations are listed in Section 5.0.

Figure 4-1



INCIDENT COMMAND SYSTEM WORKSHEET

Figure 4-2 – Immediate NRDA Response Checklist

	Action Item	Date/Time Initiated
1.	Designate Lone Star NGL Mont Belvieu L.P.'s Planning Section Chief (NRDA Coordinator).	
2.	Place NRDA consultant(s) on standby, or mobilize if any chance of NRDA action.	
3.	Obtain sample of source product and archive as directed by Corporate Legal Department.	
4.	Identify natural resources "at risk".	
5.	Obtain initial spill information, including:	
	• _____ Incident characteristics,	
	• _____ Spill properties,	
	• _____ Site conditions,	
	• _____ Extent and movement of product over time,	
	• _____ Product recovery/containment operations,	
	• _____ Effected and threatened natural resources,	
	• _____ Wildlife injury,	
	• _____ Preliminary economic data,	
	• _____ Information on photographs and/or videos already taken, and	
	• _____ Establish procedure for periodic update from appropriate Lone Star NGL Mont Belvieu L.P. spill response personnel.	
6.	Designate a NRDA Documentation Officer and begin documentation process (i.e., photographs, video).	
7.	Obtain sample of spilled (weathered) material from first responders.	
8.	Determine the proper analysis to be conducted on both source and weathered oil samples.	
9.	Identify NRDA Trustees and arrange meeting immediately upon their arrival.	
10.	Initiate cooperative assessment process with Trustees.	

Figure 4-3 – Short-Term NRDA Response Checklist

	Action Item	Date/Time Initiated
1.	Obtain update from appropriate cleanup personnel.	
2.	Reassess adequacy of present NRDA staffing and upgrade or downgrade, as appropriate.	
3.	Reassess adequacy of present NRDA equipment and upgrade or downgrade, as appropriate.	
4.	Update Lone Star NGL Mont Belvieu L.P. legal counsel on status of agency contacts and	
5.	Obtain periodic sample of spilled (weathered) material from appropriate cleanup personnel to document the degradation of the spilled material.	
6.	Identify if historical background samples are needed and obtain, as necessary.	
7.	Update identification of natural resources impacted and "at risk."	
8.	Update appropriate Lone Star NGL Mont Belvieu L.P. spill response personnel on natural resources "at risk" of impact and discuss protection and/or cleanup	
9.	Verify any additional impact to natural resources with appropriate cleanup personnel.	
10.	Reassess NRDA sample collection procedures; modify as necessary.	
11.	Update meeting with NRDA Trustees, if on-scene.	
12.	Continue on-site documentation: photography and aerial video taping.	
13.	Determine the need for additional on-site shoreline/impact assessment.	
14.	Continue documenting reports of fish and wildlife impact.	
15.	Continue document reports of economic impact such as: • Channel closings, • Fish advisories, • Water intake closings, and • Other	
16.	Update reports of fish and wildlife impact.	
17.	Coordinate wildlife collection and/or rehabilitation with appropriate state and federal agencies.	
18.	Conduct additional fish and wildlife assessment(s), as necessary.	
19.	Modify NRDA sampling plan as impact to natural resources changes.	

Spill Assessment

Direction and Rate of Flow – Due to the location of Lone Star NGL Mont Belvieu L.P. pipelines and facilities, it is not anticipated that modeling would be necessary to predict probable direction and rate of movement. In the event modeling is desirable or required, it is likely it will be in the latter stages of spill response and an outside contractor will be selected to assist with the modeling. The movement of most spills into bays and rivers can be forecast without the aid of a complex computer model. Once in the bays, modeling may be useful. So if there is a chance of a spill entering a bay, modeling should be done early so that "pre-impact" conditions can be assessed.

Discharge Volume Measurement – The initial calculation of a quantity of materials spilled during any reportable release must be made within the first 4 hours after verification. If daylight is necessary to make the calculation, it will be made within 3 hours after first daylight.

The final calculation of the quantity released in any incident shall only be made after several factors are considered, including:

- actual metered over and short of the batch of product in a pipeline system, once placed back into service;
- actual quantity of materials recovered from the spill site;
- estimate of quantity absorbed in pads, soil, debris, and sediments; and
- calculations on evaporated product lost prior to, and during, the clean-up process.

The estimated amount of discharge materials potentially resulting from a pipeline failure will be determined using several factors, which will include but are not restricted to:

- actual opening in the pipeline,
- line pressure at the time of the failure,
- time the leak was active (from first indication of a leak to the time the leak was initially repaired, either temporary or permanent),
- area which the spill encompasses,
- estimated average thickness of product plume or depth of product, and
- line over and short based upon the upstream and downstream measurement devices at the time the line is shut down and blocked isolated.

A release from tankage will be calculated by using the actual physical gauge of remaining product in a tank versus the last known gauge plus/minus metered product either into or out of the tank.

For the initial publication of any information on the quantity of a release, if that quantity is unknown, *state this fact* to the governmental agency to which the report is being submitted.

Material Sampling and Test Methods – Upon notification of a suspected spill, the Pipeline Operator I at the controlling location will, with information available, determine known line fills to the estimated location of the spill. Upon this determination, based on the known batches in the system and the metered product delivered/received, they shall report to individuals responding to the spill site, the type product that would have been passing through the suspected area.

After the system valves have been closed and the pipeline has effectively been isolated, the responders on the scene are to verify the type product spilled. This can be accomplished initially by sight and/or smell. At the earliest possible opportunity, and only if additional verification is necessary, a sample should be collected. This sample is to be transported to the nearest Lone Star NGL Mont Belvieu L.P. lab, located at each major facility, where testing measures can be utilized to ensure that the initial identification was correct.

Methods of testing to be utilized can be, but are not limited to; measurement of gravity, color analysis, and flashpoint tests. All tests are to be handled in accordance with approved Lone Star NGL Mont Belvieu L.P. and industry accepted procedures. The results of the tests are to be relayed to Lone Star NGL Mont Belvieu L.P.'s QI. These results will assist his staffing in the evaluations necessary to implement effective measures for clean-up.

Identifying Locations Requiring Immediate Response

All pipeline systems, regardless of location, are in areas that would require an immediate response to

prevent hazards to the public and the environment if the system failed or malfunctioned. Upon initial observation or notification of a potential problem on or near the system, personnel shall follow the guidelines set forth in the General Emergency Response Procedures, found in Section 2.0 under. Internal notification shall be made in accordance with the "Pipeline and Facility Incident Report", Section 2.0 – Notification Procedures.

Personnel involved in any notification of a potential problem will be responsible for determining the validity of the notification, and assessing their immediate supervisor of the situation in a timely manner.

A written record of any notification of a potential problem on the system must be made by the person receiving the notification. The following Company report shall be prepared:

Form 312 Initial Notification of System Emergency

Spill Containment, Removal and Recovery

Containment of Spills on Water – Most materials transported by Lone Star NGL Mont Belvieu L.P. are floating in nature. Once a spill enters a waterway, the spilled material is subject to the same movement and dispersal forces as the body of water. Water movement can cause spills to travel over wide areas relatively quickly and makes rapid containment very important.

Mechanical Booms: The deployment of booms should take place on streams with a current of approximately 1.5 knots or less. With faster moving water currents, typically the product will entrain beneath the boom. However, this entrainment can be reduced and controlled. By placing the boom at an angle to the flow, the load on the boom per unit area is reduced. Should the entrainment continue, the deployment of a secondary boom downstream of the first will become necessary. This boom will be deployed at the point where the entrained materials begin to resurface. Should the secondary boom not totally restrict the entrainment of materials, a third or possibly a fourth boom will be placed onto the waterway. In the event of large quantities of debris on the waterway, steps must be taken to insure the debris is removed from behind the booms so that they are not overloaded and a failure result.

Small Waterway Containment: In the case of a spill on a small waterway such as a creek, irrigation canal, or drainage ditch, a number of control methods can be implemented. The most effective containment on such a waterway will be evaluated using pertinent case-by-case and site-specific information.

Underflow Dams: This method utilizes a series of pipes which control the water flow from below the surface while the surface spill material is maintained behind a dam which has been constructed to impede the flow of the waterway. Materials that should be considered for such a dam can be dirt from the surrounding area, or if time permits, hauled in from other locations, steel plates with an overall depth sufficient to be planted into the bottom of the waterway.

The upstream end of the pipes should be angled downward so that water will be drawn from far enough below the surface to prevent the floating spill material from being pulled through the pipes. To prevent vortex and subsequent spill loss, several techniques can be utilized. The upstream ends of the pipes can be cut at a 45 degree angle so that a portion of the pipe extends over the area of water intake. Elbows can be utilized to extend the intake further downward. Once the dam is in place, if vortices occur, a piece of plywood can be laid over the area to reduce the effect.

If the containment mechanism is made of soil, it will be compacted tightly around the underflow pipes to help eliminate the tendencies of water to flow through between the soil and pipes. The ends of the pipes on the downstream side should be far enough away from the dam to prevent a washout from the resulting turbulence. Such a dam must be monitored to assure that silting is not occurring which could result in water levels rising and eventual overflow.

Overflow Dams: Containment is accomplished in this procedure by simply damming a waterway. Usually this will be accomplished by utilizing the soil adjacent to the area that is to be dammed off. Sufficient pumps or siphoning hoses must be present to allow the capability of moving a volume of water to prevent an overflow. The dam site must be monitored at all time to assure that the suction devices on the pumps or the siphoning hoses are kept at a level so that the spilled materials are not included in the discharge of these devices.

Containment Weirs: Weirs can be utilized to impede the movement of floating spilled materials. These weirs are man-made obstructions constructed with handles for easy deployment and retraction. Weirs will typically be constructed out of lumber, plywood, plastic sheeting over chicken wire, or various other materials available to the cleanup crews.

With the usage of a weir, the personnel deploying them must be aware of entrainment. Measures must be taken to assure this phenomenon does not occur.

Sorbent Filter Fences: Utilizing either sorbent booms or loose sorbent pads, these are to be deployed in such a manner to allow the spilled material to flow under a floating dam. If using loose pads, fencing material should be used to maintain the sorbent pads. These materials will be placed on the upstream side. The absorbent must be replaced frequently to assure containment of the spill as it becomes saturated.

Straw or hay bales can be utilized as an initial sorbent fence, or only until other materials can be brought to the scene of a containment area. These materials are not as effective and should only be considered as temporary containment.

Containment of Spills on Land – Spills that occur on land do not travel as far or spread as rapidly as spills on water. Spills on land are usually visible and soil, vegetation, and other materials tend to restrict the lateral movement of the spill.

Initial efforts to contain a spill on land should be through the use of a barrier or in an excavation of some type. Dikes may be constructed of readily available materials at the scene (soil).

Spilled liquids will naturally move down gradient and can collect in already existing depressions, ditches, or pits. In some cases, it may be necessary to dig channels to allow a spill to move into natural depressions or specially constructed pits. When possible, holding pits should be lined with impervious material. Water can be used to form a barrier between the spilled material and the soil. Care must be taken to ensure that the addition of water will not worsen the situation.

Physical barriers should also be considered for controlling spills on land. These barriers may be constructed to totally contain a spill or divert a spill away from sensitive areas such as water runoff openings, watercourse, etc. Earthen dikes can be constructed. In some cases, sandbags can be used. Fill material can be the soil available around the spill site. However, this method can increase the amount of contaminated materials that must be disposed of unless an impervious material is placed on the product side of this barrier.

Storage and Disposal

On-site Storage – Several means of on-site storage are to be utilized, dependent upon the clean-up measures being taken.

With the utilization of skimmers on large bodies of water for product retrieval, the product is to be pumped into portable skid-mounted tanks, which can be placed onto the water in work boats, or barge. This product will then be transported to the shoreline, transferred into vacuum or tanker trucks (if necessary), and pumped into the transmix tank. If there is no tankage on-site, the product will be transported to the nearest Lone Star NGL Mont Belvieu L.P. facility with tankage.

Sorbent pads, sausage roll booms, and other adsorption materials are to be collected from the clean-up site, placed into containers, such as plastic garbage cans or metal drums, and transported onshore and placed into lined roll-off containment bins. These bins are to be covered at all times to reduce evaporation as much as possible. If the spill is not of the magnitude to warrant large containment bins, all materials are to be placed into DOT-approved containers (steel, removable-head container – UN1A2) that must be sealed and marked or labeled with the identification of the waste generated and the date of waste generated. The bins/drums will later be used to transport the materials to an approved landfill for disposal.

Off-site/Temporary Storage – If no on-site tankage is available, product retrieved from the release site is to be transported by vacuum or tanker trucks to the nearest Lone Star NGL Mont Belvieu L.P. facility with tankage. The product is then pumped into the transmix tank at that facility, where it will remain until the product has been separated from any water picked up as part of the retrieval process. The separated

water will then be removed from the tank and properly disposed of. In the unusual event that Lone Star NGL Mont Belvieu L.P. storage is available neither on-site, nor within a reasonable distance from the incident site, Lone Star NGL Mont Belvieu L.P. will obtain temporary, on-site storage from the OSRO.

Product Recovery – During cleanup procedures at the release site, all free product is to be removed by either vacuum truck or skimmers, when practical. Once the product has been collected, it is to be transported to the nearest Lone Star NGL Mont Belvieu L.P. facility with tankage. The product is then pumped into the transmix tank at that facility, where it will remain until the product has been separated from any water picked up as part of the retrieval process. The separated water will then be removed from the tank and properly disposed of.

Any residual product remaining on water at the scene is to be patted with sorbent material to remove as much of the product as possible. Used sorbent materials are then to be stored in DOT-approved containers, as described above.

Materials recovered from the release site are to be classified as either hazardous or nonhazardous materials. Once the classification has been given, the materials will be handled and disposed of in accordance with the appropriate governmental guidelines. Materials that can be recycled may be transported to a recycling site for re-use.

Every effort is to be made to isolate as much debris from the released product as possible during cleanup. Containment booms, sorbent booms, and filter weirs are to be utilized to assist in the management of debris in the area of contamination. Materials that have been isolated prior to contamination are either to be removed from the scene by scooping them from the water, or kept isolated until the area has been returned to its natural state.

Transportation – In the event of a significant release of product onto any body of water that comes under the jurisdiction of OPA 90, Lone Star NGL Mont Belvieu L.P. will contact an OSRO of their choice for assistance in the cleanup process. All matters regarding the transportation of equipment (boats, trailers, response vans, etc.) will be handled by the OSRO. Lone Star NGL Mont Belvieu L.P. response equipment is currently registered or permitted by appropriate state and/or federal agencies.

All materials and/or product collected during a cleanup are to be transported in a manner that complies with all applicable government regulations. Materials are to be transported by vendors currently licensed to transport DOT hazardous materials. Vendor licenses and compliance with regulations are a matter of record and have been reviewed prior to contracts being issued.

Solid materials recovered during a spill response are to be packaged in DOT-approved containers with sealed lids for transportation. Each drum is to be marked in such a manner that the contents are easily identifiable, including the date the materials were put into the container. Lone Star NGL Mont Belvieu L.P. personnel, at the originating location, are to visually ensure that proper labeling of the DOT-approved containers has been accomplished. Appropriate placards are to be made available, if needed for the transporter's use. At the time of transport, manifests or Bills-of-Lading are to be filled out by the authorized transporter and are to remain with the containers until the final destination has been reached.

Waste disposal – During cleanup of a release, waste disposal is a critical issue that must be addressed as quickly as possible. The nature of the product spilled determines whether it is considered a hazardous material or a non-hazardous material. EPA and corresponding state waste regulations must be followed to make the determination.

If the product is classified as hazardous by the mixture rule (non-hazardous product being mixed with a hazardous material), all materials generated during cleanup are to be considered hazardous. If the product is classified as non-hazardous, materials generated during cleanup will be considered non-hazardous. Temporary storage of materials will be handled in accordance with the materials' classification as either hazardous or nonhazardous.

Proper destinations for materials generated during a cleanup are defined by the Resource Conservation and Recovery Act (RCRA). Testing of the product along with available data will be used to develop a hazardous waste determination. Hazardous materials generated will be incinerated or recycled. Non-hazardous materials generated will be stabilized, dryed, and disposed of in a Class I or Non-Hazardous landfill. Lone Star NGL Mont Belvieu L.P. has pre-arranged statewide and site-specific waste-

management permits and/or registrations as permitted by the Clean Water Act, RCRA, and related statutes.

Waste Minimization – Every effort will be exercised to minimize the quantity of waste generated by Lone Star NGL Mont Belvieu L.P. during spill response and cleanup. Generally, Non-hazardous waste will be kept separate from hazardous waste so that there will be less total volume of hazardous waste to be disposed.

Safety, Health and Security

The following procedures are to be used to ensure compliance with OSHA regulations pertaining to emergency response:

- Upon activation of the Lone Star NGL Mont Belvieu L.P. Emergency Plan (Section 3.0), a site-specific safety plan (Refer to the Response Site Safety Plan form) is to be implemented. This plan will list the on-site organization and coordination of personnel that establishes a chain-of-command in the area that has been affected. To the extent possible this list will match the Incident Command System Worksheet, as described above in this section.
- The Initial Responder or Site Safety Officer will conduct a site evaluation to establish site hazards and the monitoring of these hazards.
- Once the site evaluation is conducted, security measures are to be outlined and communicated with all personnel responding at the location. There is to be no breach of security, once established.
- The QI must establish, through his on-site staff, a Response Site Safety Plan (the form found on the following pages for an example). This plan is to be maintained at the scene.
- Personnel associated with the response will continually monitor for potential airborne contaminants and oxygen deficiencies using portable testing equipment such as flammable vapor/oxygen monitors and chemical sampling tubes.

Area maps, system alignment sheets, and location drawings will be maintained on location by the Incident Commander or a designated staff member. These will be employed to provide knowledge of evacuation routes, terrain changes, and any other pertinent information to responders on the scene.

Response Site Safety Plan

The Lone Star NGL Mont Belvieu L.P.'s Response Site Safety Plan to be filled out during a spill event or incident is located in Section 10 - Forms. All personnel present at the spill/incident site and involved in response activities will sign the Site Safety Plan form indicating that they have read and are familiar with these safety procedures.

SECTION 5.0 NOTIFICATION TELEPHONE DIRECTORIES

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NOTIFICATION TELEPHONE DIRECTORIES

Table 5-1. DOT Qualified Individuals and Alternates

Name:	Title:	Responsibility:	Phone Number:
Rusti Beckmann	Sr. Manager	QI	281-385-3620 Office (b) (6) Mobile
Brad Widner	Director of Operations	Alternate QI	281-385-3671 Office (b) (6) Mobile

*Note: QI = Qualified Individual / Incident Commander / Emergency Coordinator
Alternate QI = Alternate Qualified Individual / Alternate Incident Commander / Alternate Emergency Coordinator

Corporate Incident Support Roster

Lone Star NGL Mont Belvieu L.P. Corporate Office: 832-668-1000

Products Pipeline Control Emergency: 281-383-2508

Department	Name	Title	Work	Home	Mobile
Operations	Brad Widener	Director of Operations	281-385-3571	(b) (6)	
Safety/Health	Murray Cato	Sr. Safety Coordinator	281-385-3575		
Environmental	Scott Clements Cindy Pate	Director of Environmental Environmental Manager	225-906-9297 281-385-3573		
Engineering/ Pipeline Repair	Chuck Frey	VP of Engineering	832-294-2913		
Pipeline Compliance	Danny Nichols	Pipeline Compliance	832-668-1006		
	Jose de la Fuente	Pipeline Compliance	281-714-2327		
Legal Counsel	Jim Wright	Assistant General Council	832-668-1454		
Finance					
Human Resources					
Rights Of Way	Rick Hoyer	Manager ROW	832-294-2917		
Insurance Claims	Todd Frazee	Director Risk Management	918-794-4561		
Telecommunications / It					
Media Relations	Brent Ratliff	VP Investor Relations	214-981-0766		
	Vickie Granado	Public Relations	214-599-8785		
	Todd Frazee	Director Risk Management	918-794-4561		
Security	Jeremy Flores	Security Specialist	832-294-2841		

Organization	**Phone number**
Federal Contacts	
National Response Center (NRC)	800-424-8802
Federal On-Scene Coordinator (OSC/COPT)	866-372-7745
U.S. Environmental Protection Agency Region 6	866-372-7745
Federal Bureau of Investigation	202-324-3000 24 hr
U.S. Coast Guard	
Marine Safety Office – Houston	713-671-5100
Marine Safety Office – Port Arthur	409-723-6500
Marine Safety Office –Galveston	409-682-1264
CHEMTREC/Bureau of Explosives	800-424-9300
EPA Region 6: Louisiana and Texas	866-372-7745 24 hr
Gulf Strike Team – Mobile, AL	251-441-6601
U. S. Fish and Wildlife Service	281-286-8282
Federal Aviation Administration:	
Houston Approach Supervisor on Duty – IAH	281-209-8660
U. S. Department of Commerce:	
NOAA SSC	206-526-6317
West Gulf River Forecast Center	817-429-2631
U. S. Army Corps of Engineers:	
Galveston District	409-766-3004
ER	409-766-3965
Contract Spill Management Team	
ES&H & Training Group (PSA-410-2013-22269)	888-422-3622
Oil Spill Removal Organization	
Clean Channel Association (member in good standing)	713-534-6195 713-534-6197 (fax)
OMI, Environmental Solutions (contract #01-GSMA-H0902)	800-645-6671 24 hr
Anderson Pollution Control (contract #08-ESA-0008)	866-609-6208
SET Environmental, Inc.(contract #06-ESA-0001)	877-447-7455
Natural Resource Damage Assessment (NRDA) Contact	
C-K Associates, LLC	225-755-1000 24 hr
State and Local	

Fire Department – Mt. Belvieu Volunteer Fire Department	281-576-2021
State Emergency Response Commission (SERC)	800-832-8224
Texas Commission on Environmental Quality (TCEQ)	512-463-7727 24 Hr.
Texas General Land Office	800-832-8224 24 Hr.
Highway Patrol County Sheriff Mt. Belvieu Police Department	409-389-2653 409-267-8318 281-576-2417
Chambers County Emergency Management Local Emergency Planning Committee (LEPC) Ryan Holzaepfel	409-267-8343
Mutual Aid Mont Belvieu (MAMB) (contact through the Mont Belvieu Police Department)	281-576-2417
Local Water Supply System: Manager – Larry Jordon	281-576-2213
Weather Report – National Weather Service, (Houston/Galveston, TX)	281-337-5192 281-337-5074
Local Television/Radio Station for Evacuation Notification	713-666-0713 KTRK-TV 713-666-4600 KTRK-TV 24Hr 713-630-3600 KTRH-Radio
Hospitals/Ambulance – San Jacinto Methodist Hospital	281-420-8600
Life Flight	713-704-4014

Additional Notification Telephone Numbers

Federal Agencies

US Fish and Wildlife Service Anahuac National Wildlife Refuge Sabine National Wildlife Refuge	409-267-3337 337-762-3816
U.S. Corps of Engineers – Galveston Office Galveston Office Contact Name – Karl Brown	409-766-3069

State Agencies – TEXAS

Texas General Land Office	800-832-8224 24 Hr.
Texas Parks and Wildlife Department Resource Protection Division Regional Office	 512-389-4800 409-892-8666

Local Agencies

Trinity River Authority (TRA) Livingston Dam, Texas Trinity, Texas	 936-365-2292 936-594-5349
City of Houston Water Plant Superintendent – Coast Water	281-424-1821
Chambers/Liberty Counties Navigation District	409-267-3541

Harris County Local Emergency Planning Committees Baytown Area	
Deer Park Area	281-420-6556
City of Houston Area	281-478-7248
La Porte, Morgans Pt., Shoreacres Area	713-928-6711
Pasadena Area	281-471-3607 713-473-7646

Private Organizations

Central States Underwater	913-780-5530
Houston Helicopters (Pearland)	281-485-1777
Petroleum Helicopters (Galveston) (Sabine Pass)	409-744-5286 409-971-2455
Halley Aerial Patrol	903-684-3171 903-631-9531 903-631-9533
Sabine Pilots Association	409-722-3126
Local Vacuum Truck service:	
Triangle Industrial Services, Inc., Orangefield, TX	409-745-5090 24 Hr.
Curtis & Son, Liberty, TX	936-334-1188
Basic Energy Services	936-258-2274 24 Hr.
Clean Channel	713-534-6195

Trained Personnel for Capture and Rehabilitation of Oiled Wildlife

Texas Parks and Wildlife Department	512-389-4848 24 Hr.
U.S. Fish and Wildlife Service	281-480-7418 24 Hr.
Wildlife Rehabilitation and Education	281-332-8319 713-643-9453 24 Hr.

Facility Response Teams

The Facility Response Teams for Response Zone 1 will consist of operations and maintenance personnel with at least 8-hour First Responder HAZWOPER Training and are listed as either Spill Management Team (SMT) members or initial responders only (to be relieved of response duties as soon as the OSRO is on-scene). Additional response will be provided by the designated OSRO.

Houston Office **Date of Last Update: May 2013**

800 Sonterra Blvd., Suite 400 832-668-1000
San Antonio Texas78258 **281-714-2185 (FAX)**

Name *	Position (responsibility)	Day Phone	Mobile Phone	Response Time
Murray Cato	Safety Coordinator	281-385-3575	(b) (6)	< 2 hours
Rusti Beckmann	Field Manager	281-385-3620		<2 hours
Brad Widener	Sr. Operations Director	281-385-3571		< 2 hours
Cindy Pate	Environmental Manager	281-385-3573		< 2 hours
Clint Kelly	Operations Coordinator South	281-932-6058		< 2 hours
Joe Berwick	Maintenance Supervisor	281-385-3625		< 2 hours

* These individuals may be called upon to respond to any of the following facility locations: P-12 pipeline and Cedar Bayou Terminal

Maximum Response Time from Field Offices to Indicated Extreme of Response Zone 1: 2 Hours

USCG Classification Level*	Location
MM/W1/W2/W3 - Rivers and Canals	Houston
MM/W1/W2/W3 - Inland	

*MM = Maximum Most Probable Discharge; W = Worst Case Discharge

Areas of Economic Importance

Flow calculations were performed in the event of a worst case discharge into Cedar Bayou from the Cedar Bayou Terminal. Because Cedar Bayou is slightly tidally influenced, calculations indicate that a worst case discharge from the terminal into Cedar Bayou would cause product to travel up to 1 mile upstream of the terminal. In the event that product only flows downstream it would be expected to flow from 0 – 12 miles downstream in the first 12 hours. At this point, Cedar Bayou enters into Upper Galveston Bay.

Facilities within 1 mile upstream (Tidal influence):

Miles Upstream	Facility Name	Address	Phone Number
None			

Facilities within 12 hour planning distance downstream (approximately 0-12 miles):

Miles Downstream	Facility Name	Address	Phone Number
3	Chevron-Phillips Chemical	9500 I-10 East	281-421-6500
5	Engineered Carbons, Inc.	9300 Needlepoint Road	281-421-2500
9	NRG Texas LP	7505 West Bay Road	281-383-4200
10	Bayer Corp., Baytown Plant	8500 West Bay Road	281-383-6700
10	Houston Shell and Concrete Company	4008 State Highway 146	281-427-3931
11	Boh Brothers Construction Company	5200 State Highway 146	281-383-2772

SECTION 6.0 FACILITY SPECIFIC INFORMATION

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FACILITY-SPECIFIC INFORMATION

Introduction

This section contains zone and facility-specific information on response resources, equipment and contractors. The first section describes the equipment and personnel necessary to respond "to a maximum extent practicable" to a Worst Case Discharge, a Maximum-Most-Probable discharge, or an Average-Most-Probable or small discharge (Refer to Section 8.0 – Discharge Volume and Planning). This equipment and personnel will be provided by contracted Oil Spill Removal Organizations (OSROs). Copies of the OSRO Certification/Classification documentation are located in Section 5.0 – Notification Telephone Directory – System-Wide. Copies of applicable SMT and OSRO contracts are maintained in the Lone Star NGL Mont Belvieu L.P.'s Houston Corporate Office.

This section also includes facility-specific information and equipment lists for Mont Belvieu North and South Terminals.

This section of the response plan represents the unique planning or reporting requirements of 49 CFR 112 (DOT) and 40 CFR 112 (EPA).

Response Resources

The Lone Star NGL Mont Belvieu L.P. response equipment listed in this section is for initial spill containment only and is not intended to represent a complete equipment inventory for any spill response. OSROs will be called in the event of a spill to complete oil spill removal. A list of OSROs under contract with Lone Star NGL Mont Belvieu L.P. is found in Volume II, Section 4.0 – Notification Telephone Directories. Response resources available from OSROs that are not classified by the USCG are reproduced at the end of that section. Lone Star NGL Mont Belvieu L.P.'s contracts with OSROs may be reviewed in the Houston Corporate Office.

The Lone Star NGL Mont Belvieu L.P. response equipment listed in this section is periodically inspected by Lone Star NGL Mont Belvieu L.P. personnel in conjunction with facility PREP drills. The equipment deployment drill requirements under PREP guidelines for Transportation-Related, Non-Transportation Related, and Marine Transportation-Related Facilities or Pipelines is the same. Specifically, equipment deployment exercises conducted (at a minimum) annually are intended to demonstrate the ability to deploy equipment and to test operational capability of key response equipment. The Field Manager is responsible for ensuring all response equipment is inspected and maintained in operational or usable condition.

Signs

All unmanned facilities will maintain in a prominent location a sign or placard that states that the GLO and NRC are to be notified in the event of an oil spill. The sign will also include the 24-hour phone numbers for these agencies.

Lone Star NGL Mont Belvieu L.P. Mont Belvieu South Terminal
Date of last update: July 2013

Communication Equipment – South Terminal – Radios are tested weekly, every Wednesday. Nextel cellular telephones are used daily.

Type	Quantity	Storage Location
Kenwood Hand-held 800 MHz – MAMB Radio	2	Operations Supervisors Office
Kenwood Base Station 800 MHz – MAMB Radio	1	South Terminal Control Room
Nextel Cellular Walkie Talkie	2	Outside operator(s) and facility personnel

Fire Extinguisher Equipment – The facility maintains a list of all fire extinguishers located at the Lone Star NGL Mont Belvieu L.P. Mont Belvieu South Terminal. The equipment is tested and maintained according to manufacturers' specifications.

Spill Response Equipment – The following equipment is maintained in the Mt. Belvieu Area to be used in the event of a spill:

Sorbents

3M Type Oil Sorbent
Amount: 4 bales – Sheets
Storage Location: Response Trailer, Warehouse Building

Other Equipment – The following equipment is maintained in the Lone Star NGL Mont Belvieu L.P. Mont Belvieu Area to be used in the event of a spill:

Fire Control Trailer (MAMB):

Various firefighting equipment

Lone Star NGL Mont Belvieu L.P. Mont Belvieu North Terminal
Date of last update: July 2013

Communication Equipment – North Terminal – Radios are tested weekly, every Wednesday. Nextel cellular telephones are used daily.

Type	Quantity	Storage Location
Kenwood Hand-held 800 MHz – MAMB Radio	1	Field Manager
Kenwood Hand-held 800 MHz – MAMB Radio	1	Operations Supervisor
Kenwood Hand-held 800 MHz – MAMB Radio	1	Maintenance Supervisor
Kenwood Hand-held 800 MHz – MAMB Radio	1	Safety Coordinator
Kenwood Hand-held 800 MHz – MAMB Radio	6	North Control Room – on charger
Kenwood base station 800 MHz – MAMB Radio	1	North Terminal Control Room
Nextel Cellular Walkie Talkie	2	Outside operator(s) and facility personnel

Fire Extinguisher Equipment – The facility maintains a list of all fire extinguishers located at the Lone Star NGL Mont Belvieu L.P. Mont Belvieu North Terminal. The equipment is tested and maintained according to manufacturers' specifications.

Spill Response Equipment – The following equipment is maintained in the Lone Star NGL Mont Belvieu L.P. Mont Belvieu Area to be used in the event of a spill:

Sorbents

3M Type Oil Sorbent
Amount: 4 bales – Sheets
Storage Location: Response Trailer, Warehouse Building

Other Equipment – The following equipment is maintained in the Lone Star NGL Mont Belvieu L.P. Mont Belvieu Area to be used in the event of a spill:

Fire Control Trailer (MAMB):

Various firefighting equipment

SECTION 7.0 TRAINING AND DRILL PROCEDURES

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TRAINING AND DRILL PROCEDURES

Self-Inspection and Response Training

This section of the Response Plan Appendix lists the specific records, logs, and documentation for all self inspections, drills, exercises, and response training performed by Lone Star NGL Mont Belvieu L.P. personnel in Response Zone 1. The following records shall be maintained at the Lone Star NGL Mont Belvieu L.P. Office and copies shall be made available to any inspector or auditor, upon request:

Facility Self Inspection Logs
Internal Exercise Documentation
HAZWOPER Training Records
Lone Star Training Records
PREP Drill Logs

Suggested Training and Drill Log forms (adopted from PREP guidelines) have been included in Section 10.0 to supplement existing Region level forms as needed.

For Lone Star NGL Mont Belvieu L.P. facilities located within the Coastal area of Texas under Texas General Land Office (TX GLO) jurisdiction, additional training of response personnel is required. Specifically, Lone Star NGL Mont Belvieu L.P. personnel and contractors are informed that detergents or other surfactants are prohibited from use in an oil spill in the water. Dispersants can only be used with the approval of the Regional Response Team, an interagency group of federal and state agency representatives charged with coordination of oil spill responses.

Field Personnel Job Descriptions

Lone Star NGL Mont Belvieu L.P. field personnel are responsible for effective operation of the pipeline in manner that ensures the safety and well-being of the public, employees, and the natural environment. Job descriptions for the following positions are included here for reference:

- Sr Manager or Operations Supervisor
- Remote Station Operator
- Storage Techs A, B , C for MtBelvieu , Plant Techs for Cedar Bayou
- Pipeline Operator II
- Pipeline Operator III
- Technicians I, II, III
- Environmental Manager
- Measurement/Quality Control Coordinator

Sr. Manager– The Sr. Manager reports to the Director of Operations. He/She accepts all responsibility associated with assets assigned to the locations within his/her area. He/She is responsible for the management and supervision of all personnel and activities involved in the operations and maintenance of all facilities within his area. Responsibilities cover all pipelines, including associated appurtenances, and rights-of-way and all pumping, loading, terminaling, and delivery facilities. Minimum qualifications: High School diploma or equivalent, five (5) years of experience and proficiency in all phases of operations and maintenance. Duties and responsibilities as they relate to Lone Star NGL Mont Belvieu L.P.'s spill response activities and hazardous waste management are as follows:

1. Ensures safe operation of assigned facilities. Ensures that all operations are conducted in full compliance with all applicable federal, state, and local regulations or requirements.
2. Ensure all company operating and governmental procedures are adhered to.
3. Institute training programs on a continuing basis for all subordinate personnel and document such training.
4. Inspect all facilities and equipment for proper performance and maintenance. Recommend needed improvements, retirements, or new construction.
5. Enforce and promote the safety program of the company. Promote good relations between the company, employees, customers and the general public.
6. Maintains a close contact with the maintenance scheduler and coordinates maintenance trouble reports and scheduled equipment maintenance to effect a minimum interruption of throughput.
7. Must be knowledgeable of all assigned facilities, piping and characteristics of pumps and drivers.
8. Must be capable of making independent decisions in matters of operations and maintenance pertaining to his responsible area.
9. Secures bids on repairs to equipment and contract work.
10. Knowledgeable of environmental regulations and company policy concerning handling and disposal of hazardous substances.
11. Attends training programs on a continuing basis including computer-base training.
12. Must be familiar with Lone Star NGL Mont Belvieu L.P.'s emergency response procedures as defined in the Operations and Maintenance Manual, Spill Response Plan, and Environmental Procedures Manual.
13. Actively participates in monthly safety meetings and provides assistance to the regional Safety Coordinator in the implementation of regional safety and training programs.
14. Performs other duties as required such as one call response, field investigations, aerial reports, etc.
15. Must be on call and available to respond 24 hours per day, seven days per week.

Remote Station Operator – The Remote Station Operator reports to the Field Manager. The Remote Station Operator is responsible for completing product deliveries, receipts and preparing necessary reports. He/She inspects and makes station equipment adjustments as directed. He/She maintains contact with the control point location as instructed. Minimum qualifications: High School diploma or equivalent; completion of Lone Star NGL Mont Belvieu L.P.'s computer based training; two (2) to five (5) years experience in pipeline and terminal operations; three (3) years experience as a Pipeline Operator II; general practical knowledge of electronics, engineering and other related technical subjects; thorough understanding of terminal and associated equipment; ability to safely operate all terminal equipment and facilities; trained in various fire fighting techniques. Duties and responsibilities as they relate to Lone Star NGL Mont Belvieu L.P.'s spill response activities and hazardous waste management are as follows:

1. Performs the operations and maintenance activities at remote facilities and connecting pipelines.
2. Inspects all facilities and equipment for proper performance, maintenance and recommends needed improvements.
3. Reviews all procedures as necessary to achieve good workmanlike performance and to ensure compliance with all company and industry standards and to meet the requirements of all regulatory agencies.
4. Enforce and promote the safety program of the company. Promote good relations between the company, employees, customers and the general public.
5. Maintains a close contact with the Field Manager with regards to maintenance trouble reports and scheduled equipment maintenance to effect a minimum interruption of throughput.
6. Performs remedial and preventative maintenance and maintains facility appearance and safety through good housekeeping practices inside and outside of the facilities.
7. Knowledgeable in environmental regulations and company policy concerning handling and disposal of hazardous substances.
8. Attends training programs on a continuing basis including computer-base training.
9. Attends all safety meetings and safety training courses as required by regulatory agencies.
10. Must be familiar with Lone Star NGL Mont Belvieu L.P.'s emergency response procedures as defined in the Operations and Maintenance Manual, Spill Response Plan, and Environmental Procedures Manual.
11. Performs other duties as required such as one call response, field investigations, aerial reports, etc.
12. Must be on call and available to respond 24 hours per day, seven days per week.
13. Assists the Pipeline Operator on operational matters.

Storage Tech A– The Pipeline Operator I reports to the Operations Supervisor. He/She is responsible for operating the terminal and stations connected by remote control. He/She inspects and makes station equipment adjustments as directed. The Pipeline Operator I controls the flow of products, ensures product quality, and maintains record keeping system to monitor operations. He/She communicates with pipeline control concerning operations of the pipeline. Minimum qualifications: High School diploma or equivalent; completion of Lone Star NGL Mont Belvieu L.P.'s computer-based training; two (2) to five (5) years experience in pipeline and terminal operations; three (3) years experience as a Pipeline Operator II; general practical knowledge of electronics, engineering and other related technical subjects; ability to safely operate all terminal equipment and facilities; trained in various fire fighting techniques. Duties and responsibilities as they relate to Lone Star NGL Mont Belvieu L.P.'s spill response activities and hazardous waste management are as follows:

1. Performs manifold line-ups, tank gauging, launch and receive pipeline pigs, re-inject sump material and performs other routine station and terminal operations.
2. Assures system flow by verifying, planning, and determining product stream routing. Confirms orders with pipeline control and scheduling.
3. Monitors and assures that product quality remains within acceptable standards to meet customer expectations. Maintains ongoing communication with other terminals concerning pipeline problems that would affect operations.
4. Maintains awareness of equipment and valves and alleviates any associated problems.
5. Communicates any unforeseen problems to Pipeline Operator s and others. Reports and responds to any emergencies and is familiar with Lone Star NGL Mont Belvieu L.P.'s emergency response procedures.
6. Monitors availability of personnel and communicates with supervisor of any special problems. Works with shift operator as they perform required activities.
7. Attends training programs on a continuing basis including computer-based training.
8. Attends all safety meetings and safety training courses as required by regulatory agencies.
9. Performs other duties as assigned.

Storage Tech B– The Pipeline Operator II reports to the Operations Supervisor. He/She assists in terminal and station operations by coordinating outside responsibilities with the Pipeline Operator I on shift to assure timely, safe and quality controlled handling of product. Minimum qualifications: High School diploma or equivalent; completion of Lone Star NGL Mont Belvieu L.P.'s computer-based training; two (2) to five (5) years experience in related field, personnel management experience; two (2) years experience as an Pipeline Operator III; general practical knowledge of electronics, engineering and other related technical subjects and a thorough understanding of terminal and associated equipment; ability to safely operate all terminal equipment and facilities; trained in various fire fighting techniques. Duties and responsibilities as they relate to Lone Star NGL Mont Belvieu L.P.'s spill response activities and hazardous waste management are as follows:

1. Performs manifold line-ups, tank gauging, launch and receive pipeline pigs, re-inject sump material and performs other routine station and terminal operations.
2. Assists in all field and manifold line-ups related to product movements.
3. Gauges tanks, monitors loading and unloading procedures for transportation of products, monitors metering instrumentation and passes information on to the Pipeline Operator I.
4. Maintains constant surveillance of the terminal or station relating any problems or potential problems to the Pipeline Operator I.
5. Assists in gathering and field evaluations including sampling and testing of products for quality control.
6. Performs remedial and preventative maintenance with the terminal or station.
7. Maintains general appearance through housekeeping both inside and outside the terminal or station.
8. Helps in developing paper work, logs and records related to inventories and quality controls.
9. Relieves Pipeline Operator I as needed.
10. Knowledge of environmental regulations and company policies concerning handling and disposal of environmental wastes.
11. Attends training programs on a continuing basis including computer-based training.
12. Attends all safety meetings and safety training courses as required by regulatory agencies.
13. Performs other related duties as assigned.

Storage Tech C - The Pipeline Operator III reports to the Operations Supervisor. He/She assists in terminal and station operations by coordinating outside responsibilities with the Pipeline Operator I or Pipeline Operator II on shift to assure timely, safe and quality controlled handling of product. Minimum qualifications: High School diploma or equivalent; completion of Lone Star NGL Mont Belvieu L.P.'s computer-based training; one (1) year experience as an Operator-in-Training; basic mechanical, electrical and electronic trouble shooting abilities; basic knowledge of terminal operations and accept responsibilities of position; trained in various fire fighting techniques. Duties and responsibilities as they relate to Lone Star NGL Mont Belvieu L.P.'s spill response activities and hazardous waste management are as follows:

1. Performs manifold line-ups, tank gauging, launch and receive pipeline pigs, re-inject sump material and performs other routine station and terminal operations.
2. Assists in all field and manifold line-ups related to product movements.
3. Gauges tanks, monitors loading and unloading procedures for transportation of products, monitors metering instrumentation and passes information on to the Pipeline Operator I.
4. Maintains constant surveillance of the terminal or station relating any problems or potential problems to the Pipeline Operator I.
5. Assists in gathering and field evaluations including sampling and testing of products for quality control.
6. Performs remedial and preventative maintenance with the terminal or station.
7. Maintains general appearance through housekeeping both inside and outside the terminal or station.
8. Helps in developing paper work, logs and records related to inventories and quality controls.
9. Relieves Pipeline Operator II / Pipeline Operator I as needed.
10. Knowledge of environmental regulations and company policies concerning handling and disposal of environmental wastes.
11. Attends training programs on a continuing basis including computer-based training.
12. Attends all safety meetings and safety training courses as required by regulatory agencies.
13. Performs other related duties as assigned.

Maintenance and I&E Technicians I, II, III – The Technician's key responsibility is to assist in evaluating and maintaining the overall system efficiency by performing preventative maintenance on equipment and instrumentation at stations and terminals by inspecting and making sure that all maintenance and repairs are performed and documented. He/She performs the mechanical and electrical functions of inspecting, checking, and repairing all company-owned vehicles, mechanical, electrical and measurement-related equipment to maintain high levels of safe and productive performance to assure minimum downtime and delay in operation activities. The Maintenance Technician assists Engineers in capital improvement projects by helping in the design of the equipment, purchasing the materials required, coordinating construction activities and documenting the results of the project. Minimum qualifications: twelve (12) years of formal education; two (2) to six (6) years of practical experience; proficiency in the use and application of test equipment and repair tools; demonstrate mechanical aptitudes and skills to the satisfaction of the Company's Field Manager. Duties and responsibilities include:

1. Performs preventative maintenance by maintaining and inspecting shutdown devices, relief valves, pumping units, motors, valves (manifold and otherwise), company vehicles and tools, cryogenic system components, emergency equipment, battery power systems, communication systems (SCADA), high voltage equipment, fractionators, LPG dehydrators, loading racks and vapor recovery systems.
2. Responsible for testing and monitoring the cathodic protection system at the terminal.
3. Monitors, checks, and maintains instrumentations.
4. Monitors and maintains the parts inventory to assure that sufficient supply of parts is available for equipment repair.
5. Performs remedial maintenance and incidental repairs (light bulbs, a/c and heating, etc.) and documents repairs made.
6. Assists in capital improvement projects by coordinating the development, research, design, construction, and purchase of materials necessary to complete the project. The Maintenance Technician is also responsible for documenting the results of the project.
7. Responsible for gathering system efficiency information by running periodic tests on pumps and motors, analyzing the test results and submitting a report of tests results and implements changes to improve efficiency if required.
8. Attends technical seminars and stays current with new hardware and technological development and maintains vendor contacts to train on new equipment and provides on-the-job training to new Maintenance Technicians on job procedures and safety practices in areas specific to other Maintenance Technicians.
9. Demonstrates a mastery of key troubleshooting concepts and techniques in performing remedial maintenance.
10. Knowledge of environmental regulations and company policy concerning handling and disposal of solid and hazardous waste.
11. Performs other duties, as assigned.

Environmental Manager – The Environmental Manager reports to the Director of Environmental. He/She is responsible for the Environmental Compliance Program and ensures that the facilities are in full compliance with all applicable laws, regulations, and company standards. Minimum qualifications: Bachelor of Science Degree; three (3) years of experience working with environmental regulations, compliance, and reporting; proficiency with word processing and spreadsheet software programs. Duties and responsibilities include:

1. Assure compliance with all applicable environmental laws and regulations.
2. Assure environmental permits are current and fees paid. Work with Sr. Managers to assure the required facility records are current and properly filed, and permit conditions are understood and followed.
3. Prepare and submit state and federal environmental reports including monthly and annual discharge monitoring reports, annual solid and hazardous waste reports, and monthly and annual emission reports.
4. Coordinate testing, profiling, processing, manifesting, and disposal of all solid and hazardous waste.
5. Coordinate remediation plans to assist in clean-up of accidental spills and releases.
6. Conduct facility environmental audits and coordinate activities to resolve any deficiencies. Participate in all outside agency inspections.
7. Plan and manage environmental projects such as the installation of waste or storm water treatment facilities, and the demolition of lead and asbestos contaminated facilities. This work will include defining the project scope, estimating cost, preparing and evaluating bids, scheduling work, tracking costs, and preparing needed reports.
8. Maintain environmental files.
9. Review construction and maintenance activities for environmental compliance.
10. Assist in the development and implementation of oil spill response plans at each facility.

Measurement/Quality Control Coordinator – The Measurement/Quality Control Coordinator reports to the Measurement Director. He/She insures an effective and efficient measurement and quality control program for the Region. Minimum qualifications: Six (6) to eight (8) years of operations and maintenance experience with four (4) years of direct involvement in measurement and quality control activities. Must have knowledge of measurement equipment and quality control principals and practices. Duties and responsibilities include:

1. Provides technical assistance to those who are implementing the Company's comprehensive measurement and quality control programs.
2. Works with Measurement Specialists and Maintenance Technicians in the calibration and proving of all pressure and temperature transmitters, meters, flow computers, and other measurement related equipment.
3. Plans, coordinates, and supervises the calibration of all prover loops in the Region.
4. Plans and coordinates the installation and maintenance of metering equipment.
5. Provides technical expertise in prescribing replacement parts for all measurement equipment.
6. Maintains records of all meter provings, calibration reports, over and short histories and trends, and other measurement information.
7. Monitors on a daily basis pipeline and terminal gains and losses and addresses potential measurement problem areas as they arise.
8. Serves as contact person for customers when addressing measurement discrepancies.
9. Implements and modifies as required the Company's measurement and quality control practices and procedures.
10. Liaison between Region and Houston office personnel with regard to measurement and quality control concerns.
11. Liaison with measurement vendors and equipment manufactures on issues related to measurement and measurement equipment.
12. Generates weekly pipeline and terminal over and short reports for management's information and review.

Lone Star NGL Mont Belvieu L.P. Training Plan

Objective – Lone Star NGL Mont Belvieu L.P.'s objective is to provide a continuous training program that teaches all employees the proper procedures and practices related to their particular job assignments to ensure the safety and well-being of employees and the natural environment, as well as effective operation of the pipeline system.

Approach – Lone Star NGL Mont Belvieu L.P.'s approach to employee training is applicable to its administrative and technical training. This approach has three primary components:

- On-the-Job-Training
- Video/Computer Based Directed Study
- Industry Approved Outside Courses
-

Administrative training requests (for personal development and computer skills) will be handled on an "as needed" basis through coordination with the Supervisor of Employee Development.

Training Methodology – The training methodology used in Lone Star NGL Mont Belvieu L.P. technical courses will utilize the latest advancements and procedures in the profession. The key components of the Lone Star NGL Mont Belvieu L.P. technical training system are discussed below.

Directed Study for Knowledge Acquisition

In comparison to "self study," directed study is a learning methodology that involves a greater degree of interaction between the student and the facilitator. The facilitator plays a more active role in monitoring progress, providing guidance and counseling.

Student manuals are a traditional and effective tool for assuring knowledge acquisition. A student manual (printed or computer based) has been developed for each technical training module designated in Lone Star NGL Mont Belvieu L.P.'s Training Plan.

To assure that Lone Star NGL Mont Belvieu L.P. employees effectively complete each module, their learning progress will be monitored and documented by their supervisor. As an example, the Field Manager will coordinate the training for Pipeline Operators and Maintenance Technicians.

Students will be required to pass each module's post-test successfully (80% or better).

Skill Building

While it is possible to transmit job knowledge successfully with training materials, behavioral skills must be acquired differently. It has been shown that learning is most effective when students are allowed to observe and emulate positive role models, who are effectively handling job-relevant situations.

The process of observing positive role models, copying their behavior, and obtaining constructive feedback is a necessary part of the training process. This training process will ensure that each Lone Star NGL Mont Belvieu L.P. employee fully grasps newly learned skills.

Skill building will be conducted during On-the-Job Training (OJT) and other directed study. Field Managers have an OJT guide to use during this process. These skills will be observed and monitored by the supervisor or technical expert to ensure that correct skills have been demonstrated.

Job-Task Qualification

The Qualification Checklist provides a thorough analysis of each Lone Star NGL Mont Belvieu L.P. position (i.e., Pipeline Operators and Maintenance Technician and serves as the foundation for all training. The Qualification Checklist identifies activities and tasks that are both necessary and desirable in order for the task to be performed effectively.

Each task identified under the Qualification Checklist has been reviewed for performance and compliance by interviews with those employees who are most knowledgeable and skilled. Completion of the task-oriented checklist will qualify employees for specific job classification within the Company.

Results Measurement – Traditional measure of the effectiveness of technical training includes measures of short and long-term knowledge retention, professed behavior change and observed behavior change. Each of these will be used to assess Lone Star NGL Mont Belvieu L.P.'s technical training results.

Specifically, there will be periodic training reviews for each individual upon completion of the training to ensure DOT compliance and to validate the training effort through the Qualification Checklist process. Those Lone Star NGL Mont Belvieu L.P. field employees who have not retained a sufficient level of information will receive remedial training that is tailored to their specific needs. As a final demonstration of skills' mastery, each Pipeline Operator and Maintenance Technician must pass a test to demonstrate to their supervisor that they have the knowledge and skills required to carry out their job assignments successfully.

Continuous Training – Lone Star NGL Mont Belvieu L.P. employees will receive additional training when newly installed equipment or new procedures impact responsibilities. Recurrent (refresher) training will be required to review the knowledge and skills developed during initial training. Recurrent training will be completed on an annual basis for selected procedures and responsibilities.

Training Familiarization for Supervisors – Lone Star NGL Mont Belvieu L.P. supervisors will complete the entire CBT Curricula for pipeline operators and maintenance technicians to maintain a thorough knowledge of the procedures established under DOT regulations.

Plan Updates – Lone Star NGL Mont Belvieu L.P.'s Training Plan will be updated annually by the Supervisor of Employee Development. Lone Star NGL Mont Belvieu L.P. Director of Operationss and their delegates, and the Manager of Pipeline Control will be accountable for submitting complete and accurate information on training activities.

Accountability –Field Managers shall be responsible for monitoring and documenting their employees' training progress.

Documentation – All training of Lone Star NGL Mont Belvieu L.P. employees will be documented and kept on record for their entire length of employment.

Emergency Response and Safety-Related Training

Lone Star NGL Mont Belvieu L.P. employees receive training to ensure that:

- All employees are familiar with their responsibilities under the Emergency Plan (Refer to Section 3.0),
- All employees are familiar with the names and addresses of, and the procedure for contacting, the appropriate Field Managers and Corporate offices on a 24 hour basis.

Lone Star NGL Mont Belvieu L.P. employees that are "reporting personnel", receive training to ensure that they:

- Are trained to be familiar with the content of the Information Summary of the OPA 90 Oil Spill Response Plan,
- Are trained to be familiar with the Notification Procedures (Refer to Section 4.0) and the toll-free telephone number of the National Response Center (800-424-8802).

Lone Star NGL Mont Belvieu L.P. employees who are engaged in response activities receive training to ensure they are familiar with:

- Characteristics and hazards of the oil discharged;
- The conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures, and the appropriate corrective actions;
- The steps necessary to control any accidental discharge of oil and to minimize the potential for fire, explosion, toxicity, or environmental damage.

All facility personnel who might be involved in an oil spill response have been informed that detergents or other surfactants are prohibited from being used on an oil spill in the water, and that dispersants can only be used with the approval of the Regional Response Team.

All Lone Star NGL Mont Belvieu L.P. employees receive safety-related training. Monthly safety meeting are conducted at field locations with safety meeting attendance being mandatory. Career path advancement requires demonstrated knowledge in operation and maintenance safety procedures, emergency response/notification, regulatory compliance, and specialty areas.

Incident notification, including telephonic reporting is included in the safety training curriculum.

Hazardous Waste Operations and Emergency Response (HAZWOPER) Training

Lone Star NGL Mont Belvieu L.P. ensures that all response personnel are trained to meet OSHA standards for emergency response and clean-up operations in 29 CFR 1910.120. Employees are trained to response levels commensurate with their job responsibilities. Specialized training is offered for Qualified Individuals and personnel responsible for hazardous waste management. In addition to the training described here, individuals are also required to obtain refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas on an annual basis. Individuals who may be involved in emergency response and/or hazardous waste clean-up operations within the Response Zone are listed in Section 5.0.

Lifecycle Progression – HAZWOPER applies to both "Emergency Response Operations" and "Hazardous Waste Clean-up Operations". Training requirements and examples of Lone Star NGL Mont Belvieu L.P. activities for personnel involved in these two general types of operations are described in this section. The Life Cycle Progression is described in the following 3 steps.

1. ***Emergency Response Operations*** – Once an emergency is identified, employees should take the following actions: **Control**, **Notify**, and **Contain**. Emergency response operations include all activities leading up to and including the containment of the spill. The following table summarizes the levels of training for personnel. A detailed description of the training, and examples of the activities these individuals can perform, follow these tables.

Response Levels	**Hours**
First Responder Awareness	8
First Responder Operations	8
Hazardous Materials Technician	24
Hazardous Materials Specialist	24
Incident Commander (QI)	40

2. ***Formal Declaration the Emergency has Ceased*** – Emergency response operations will be in effect ***until the QI has formally declared that an emergency no longer exists*** and that activities are now in a "Clean-up Operations" mode. Generally, an emergency situation no longer exists when hazardous materials are contained and there is no immediate concern for public safety. At that time, personnel must be trained to the hazardous waste clean-up operations level, as described below.
3. ***Hazardous Waste Clean-up Operations*** – Lone Star NGL Mont Belvieu L.P. on-site personnel may perform clean-up operations at a Company facility without a HAZWOPER Certification Level provided they have completed the appropriate training in Fire and Emergency Planning, Respiratory Protection, and Hazardous Communications. For any other situation where other Lone Star NGL Mont Belvieu L.P. personnel, contractors, and/or OSROs are required to conduct clean-up operations on-site, or where any Lone Star NGL Mont Belvieu L.P. personnel are required to conduct clean-up operations off-site, the individuals must have the following training levels.

Clean-up Levels	**Hours**

Supervisor (QI)	48
Site Worker With Respirator	40
Site Worker Without Respirator	24

Emergency Response Levels – The following provides detailed descriptions of each level of training and examples of activities that can be performed by Lone Star NGL Mont Belvieu L.P. employees with each level of training under emergency response operations. All levels have the ability to implement the Emergency Plan.

First Responder Awareness

Training includes at least 8 hours of training and competency in the following areas:

- Understands what hazardous substances are and risks associated with them.
- Understands potential emergency situations that may occur when hazardous substances are present.
- Can recognize presence of hazardous substances in an emergency.
- Can identify hazardous substances, if possible.
- Understands the role of first responder awareness individual in Lone Star NGL Mont Belvieu L.P.'s Emergency Response Plan.
- Can realize the need for additional resources and make appropriate notifications to Lone Star NGL Mont Belvieu L.P.'s communication center.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Call for Help

First Responder Operations[1]

Training includes at least 8 hours of training and demonstrated competency in the following areas, as well as those listed in the awareness level:

- Knows basic hazard and risk assessment techniques.
- Knows how to select and use proper personal protective equipment (PPE) provided to the first responder operational level.
- Understands basic hazardous materials terms.
- Knows how to perform basic control, containment and/or confinement operations, within constraints of PPE and resources available.
- Knows how to implement basic decontamination procedures.
- Understands relevant standard operating procedures and termination procedures.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- From a safe location, an individual can shut off the flow of spilled material (i.e., close valve, isolate spill area) from Lone Star NGL Mont Belvieu L.P. facility, pipeline, etc.

[1] Individuals who respond to releases or potential release of hazardous substances as part of the initial response. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposure.

Hazardous Materials Technician[2]

Training includes at least 24 hours of training equal to the first responder operations level and demonstrated competency in hazardous substance and emergency awareness, basic operations, and the following:

- Implement Lone Star NGL Mont Belvieu L.P.'s emergency response plan.
- Classify, identify, and verify known and unknown materials.
- Know ICS role functionality.
- Selection and use of PPE.
- Understand hazard and risk assessment techniques.
- Perform advance control, containment &/or confinement operations.
- Understand and implement decontamination procedures.
- Understand termination procedures Understand basic chemical and toxicological terminology and behavior .

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Assist in determination of relative safety of the incident.
- In safe situations, personnel trained to the Haz. Mat. Technician level may enter an area to repair, or patch Lone Star NGL Mont Belvieu L.P. facilities or pipeline, etc.

Note: Lone Star NGL Mont Belvieu L.P. does not have the proper PPE, training, or equipment to support their personnel in entering potentially unsafe or hazardous situations.

Hazardous Material Specialist[3]

Training includes at least 24 hours of training equal to the technician level and demonstrated competency in hazardous substance and emergency awareness, basic operations, all requirements listed under Haz. Mat. Technician and the following:

- Local emergency response plan.
- State emergency response plan.
- Understands in-depth hazard and risk techniques.
- Perform specialized control, containment &/or confinement operations.
- Determine and implement decontamination procedures.
- Develop a site safety and control plan Understand chemical, radiological, and toxicological terminology and behavior.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Offer guidance and assistance to city firefighter, or other properly trained contractors in containing the system.

Incident Commander (QI)

Training includes at least 40 hours of training equal to the first responder operations level and demonstrated competency in hazardous substance and emergency awareness, basic operations, and the following:

- Implement Lone Star NGL Mont Belvieu L.P.'s ICS.
- Implement Lone Star NGL Mont Belvieu L.P. Emergency Response Plan.
- Know and understand chemical protective clothing hazards and risks.
- Know how to implement local emergency response plan.
- Know state emergency response plan and federal regional response team.

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[2] Individuals who respond to releases or potential releases for the purpose of stopping the release.

[3] These individuals respond with and provide support to Haz. Mat. Technicians. Duties require a directed or specific knowledge of the various substances they may be called to contain. Haz. Mat. Specialists acts as the site liaison with federal state, local and other government authorities.

- Know and understand importance of decontamination procedures.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Respond on a 24-hour basis, with full authority to activate and contract with OSROs.
- Activate personnel and equipment maintained by Lone Star NGL Mont Belvieu L.P..
- Act as liaison with federal or state OSC.
- Obligate funds required to carry out all required or direct response activities.
- Refer to full description of activities in Volume I, Section 4.0 – Response Activities.

Hazardous Waste Clean-Up Levels – The following provides detailed descriptions of each level of training and examples of activities that can be performed by Lone Star NGL Mont Belvieu L.P. employees with each level of training under hazardous waste clean-up operations.

Supervisor (Q)I[4]

Training includes 40 hours initial training and 3 days of supervised field experience and at least 8 hours of specialized training. (The initial training and experience may be reduced to 24 hours and one day, if only responsible for 24-hour trained employees.)

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Respond on a 24-hour basis, with full authority to activate and contract with OSROs.
- Activate personnel and equipment maintained by Lone Star NGL Mont Belvieu L.P..
- Act as liaison with federal or state OSC.
- Obligate funds required to carry out all required or direct response activities.
- Refer to full description of activities in Volume I, Section 4.0 – Response Activities.

Site Worker With Respirator [5]

Training includes 40 hours of off-site instruction and a minimum of 3 days of supervised field experience. Respirator training included in 40-hour training.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Once flammability levels are determined to be safe, individual can clean up product in areas where vapor measurements indicate the need for a respirator

Site Worker Without Respirator[6]

Training includes 24 hours of off-site instruction and a minimum of 1 day of supervised field experience.

Example of Lone Star NGL Mont Belvieu L.P. Activity:

- Once flammability levels are determined to be safe, individual can clean up product in areas where vapor measurements indicate no need for a respirator.

[4] On-site management and supervisors directly responsible for, or who supervise employees engaged in hazardous waste operations.

[5] Personnel engaged in hazardous substance removal or other activities that expose or potentially expose workers to hazardous substances and health hazards (equipment operators, general laborers, supervisory personnel…)

[6] Workers on-site only for specific limited tasks and workers regularly on-site in areas which have been monitored and characterized indicating exposures are under permissible exposure limits and where respirators are not necessary.

Drill Procedures

Lone Star NGL Mont Belvieu L.P. has adopted the general guidelines of the National Preparedness for Response Exercise Program (PREP) as established to meet the intent of the Oil Pollution Act of 1990 (OPA 90) for spill response preparedness. "The PREP is a unified federal effort and incorporates the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA), the Research and Special Programs Administration (PHMSA) Office of Pipeline Safety (OPS) and the Minerals Management Service (MMS). Adoption of the PREP guidelines and participation in the PREP will satisfy all OPA 90 mandated federal pollution response exercise requirements."

Implementation of PREP guidelines for each facility is accomplished through the use of the following procedures (excepted and modified from the procedures provided in the National PREP Workshop guidance document dated August 5, 1993 and notice of availability of PREP guidelines 58 FR 53990; October 19, 1993). All future drill procedure changes will be consistent with current PREP guidelines as appropriate and incorporated into this plan on the following plan revision.

Lone Star NGL Mont Belvieu L.P.'s drill procedures include:

- Drill Criteria and Frequency
- Unannounced Drills
- Federally-Designated Area Exercises
- Federally-Designated Area Exercise Scheduling
- Drill or Exercise Participation Credit
- Drill Documentation
- Drill Requirements for Complexes
- Federally-Designated Area or Facility-Specific Requirements

(Note: the word "Area" as used in this section indicates a Federally Designated Area which has a separate and distinct Area Contingency Plan as described in OPA 90).

Suggested Training and Drill Log forms (adopted from PREP guidelines) have been included in the Response Zone Appendix (Volume II, Section 8.0) to supplement existing Region level forms as needed.

Drill Criteria and Frequency **-** Every three years all components of the entire Response Plan will be exercised. The following Response Plan components will be exercised at least once every three years:

Organization's Design:

1. Notifications (Qualified Individual/Incident Commander)
2. Staff mobilization (Facility Response Team and Spill Management Team)
3. Ability to operate within the response management system described in the plan

Operational Response

4. Discharge control
5. Assessment of discharge
6. Containment of discharge
7. Recovery of spilled material
8. Protection of economically and environmentally sensitive areas
9. Management, disposal, or reclamation of recovered product

Response Support

10. Communications
11. Transportation
12. Personnel support
13. Equipment maintenance and support
14. Oil Spill Removal Organization (OSRO) contracting
15. Documentation

To meet the triennial (3-year) cycle of exercising the entire Response Plan, it is not necessary to exercise the entire plan all at one time. The plan may be exercised in segments over a period of three years, as long as each component of the plan is exercised at least once within the three-year period.

For example, a facility could set up an exercise (not necessarily large-scale) that tests the Spill Management Team and includes equipment deployment. If the scenario were developed properly, all components of the plan could be exercised in this one exercise. Likewise, participation in a Federally-Designated Exercise will result in the completion of all components of the plan at one time. A Qualified Individual (QI) Notification Drill could be developed to include all notification requirements identified in a response plan and would thereby satisfy the notification component. An Equipment Deployment Drill could be developed to meet the discharge control, assessment of discharge, containment of discharge, recovery of spilled material, protection of economically and environmentally sensitive areas, and disposal/reclamation of recovered product components, if the spill scenario were designed and carried out to address these items.

The 15 components identified are the core components of this Response Plan. As stated before, not all components will be included in each exercise, but the majority will be. The objective of exercising each component is to ensure that enough information and guidance is available to the user for adequate spill response. The adequacy of the total plan can be demonstrated through the various exercises.

In the triennial cycle, the following internal exercises must be conducted:

- 12 QI Notification Drills
- 12 Emergency Procedures Exercises
- 3 Spill Management Team Tabletop Exercises (one must involve a Worst Case Discharge Scenario)
- 3 Unannounced Exercises (Any of the exercises, with the exception of the QI Notification Drill, if conducted unannounced, will satisfy this requirement; one of the Unannounced Exercises must be an Equipment Deployment Exercise)
- 3 OSRO Equipment Deployment Exercises (utilizing Lone Star NGL Mont Belvieu L.P.'s contracted Oil Spill Removal Organizations)

The annual SMT tabletop exercise will include the actual notification to the NRC, the TGLO and the OSRO, to determine availability and response times. Each call that is made will begin with the statement "This is a drill".

Unannounced Drills – Each Lone Star NGL Mont Belvieu L.P. District (i.e. DOT Zone), Marine-Transportation-Related Facility (USCG regulated), Truck and Rail Loading Racks (EPA regulated), and Non-Transportation-Related Storage Facility (EPA regulated) or Complex (a multi-agency regulated facility) will conduct an internal unannounced drill annually. This will not necessarily have to be a separate drill. Any of the required drills, with the exception of the QI notification drill, that is conducted unannounced will satisfy this requirement. Every three years, one of the unannounced exercises will include equipment deployment. The equipment deployed in the unannounced exercise may be credited toward meeting the requirement for the equipment deployment exercise. The Lone Star NGL Mont Belvieu L.P. Director of Operations, VP of Operations, or Field Manager, will have the option of determining how the unannounced exercise shall be conducted.

Federally Designated Area Exercises **-**Lone Star NGL Mont Belvieu L.P. Director of Operations or their representatives will be responsible for scheduling exercises for facilities/zones that hold Response Plans and are asked to participate by the government.

The purpose of the Federally Designated Area Exercises is to exercise the entire response community in a particular Federally Designated Area. A Federally Designated Area is defined as "that geographic area for which a separate and distinct Area Contingency Plan has been prepared as described in OPA 90" and the National Contingency Plan (NCP). For EPA Areas with sub-area plans or annexes to the Area Contingency Plan, the EPA Regional Administrator will decide which sub-area is to be exercised within the triennial cycle. At this time, the boundaries for the Federally Designated Areas include the Coastal Zone Area boundaries for the Coastal Zone, and the EPA Regional boundaries for the Inland Areas.

The response community includes the federal, state, local Government, and industry. The Federally

Designated Area Exercises are designed to exercise the government and industry interface for spill response.

The goal is to conduct 20 Federally Designated Area Exercises per year nationwide, 60 within a triennial cycle. Six of the 20 annual exercises will be led by the government and 14 will be industry led. All of the Federally Designated Area Exercises will be developed by an exercise design team. The exercise design team will be composed of representatives from industry. A "Lead Plan Holder" will lead each Federally Designated Area Exercise. The Lead Plan Holder is the organization (government or industry) that holds the primary response plan that will be exercised in the Federally Designated Area Exercise. The Lead Plan Holder will be actively involved with the design team in the exercise development process. The Lead Plan Holder will have a significant voice in outlining the scope, scenario development and execution of the exercise. The USCG or EPA will be the lead agency for the 6 government led exercises, with PHMSA and MMS participating as appropriate. The 14 industry exercises will be led by the various segments of the industry.

The Federally Designated Area Exercises do not necessarily have to be large-scale productions. The scenario does not always have to involve a worst case discharge. They can be small, based on an average most probable discharge. The focus should be to have interaction between Lone Star NGL Mont Belvieu L.P. and the federal, state and local government -- to exercise both the Area Contingency Plan and Lone Star NGL Mont Belvieu L.P.'s Response Plan. There should be some level of equipment deployment, whatever is appropriate for the scenario. The Federally Designated Area Exercise will involve at a minimum, the following criteria:

- 8-12 hours in duration
- Full test of Lone Star NGL Mont Belvieu L.P. Response Plan
- A test of the Unified Command System government for the Federally Designated Area
- The scenario will be developed by Lone Star NGL Mont Belvieu L.P., in consultation with the exercise design team
- The scenario will involve equipment deployment; the extent of equipment deployment shall be determined by Lone Star NGL Mont Belvieu L.P., in consultation with the exercise design team

Exercise objectives are outlined in subsequent pages of this section as provided in PREP guidance document.

Federally-Designated Area Exercise Scheduling – Scheduling of Federally Designated Area Exercises will be done under a nationally coordinated system that involves federal, state, local governments, and plan holders (Lone Star NGL Mont Belvieu L.P. Zones/Facilities), and that recognizes the unique needs of specific geographic regions of the country.

A National Scheduling Coordinating Committee (NSCC) established for scheduling Federally Designated Area Exercises is comprised of personnel representing the USCG, EPA, PHMSA, and MMS. The NSCC will be charged with developing a strawman schedule and then coordinating with the state, regional and local government agencies and the industry to ensure equitable exercise of industry components and Federally Designated Areas.

Federally Designated Area Exercise scheduling will be performed by the NSCC which will first divide the three calendar years into sixty separate time blocks, to accommodate the twenty yearly exercises. The sixty Federally Designated Areas to be exercised will then be selected based on various criteria, including high volume port activity, spill activity, date of last major exercise, etc. Each Federally Designated Area selected will then be tentatively scheduled for either an industry or government led exercise in one of the exercise time blocks.

Once the Federally Designated Areas and exercise dates are chosen, the NSCC will work through the Regional Response Teams (RRT) Co-Chairs and through regional groups, if they exist, to solicit additional input from the On-Scene Coordinator (OSC), state agencies and industry to address the full spectrum of concerns at the local, state and regional level. The regional contacts will be asked to coordinate input from the Area Committee level as well. Input back to the NSCC will include identification of any potential conflicts with exercises planned by other entities, and nominees for lead industry led exercise in a given Federally Designated Area. Each Federally Designated Area should provide a list of

the five or six industry nominees.

Thereafter, the NSCC will meet in October of each year to review the overall effectiveness of the PREP and to begin development of the schedule for the third calendar year of a three-year cycle, so that a complete three-year schedule is always current.

NOTE: The NSCC will attempt to take all relevant issues into consideration when developing the schedule. For example, if an industry plan holder is chosen to participate in an exercise on the West Coast, the same plan holder will not be selected to participate in an exercise on the East Coast. Likewise if a plan holder participated in a Federally Designated Area Exercise previously, they will be exempt from participation in another Federally Designated Area Exercise for 6 years. If a major spill occurred in a Federally Designated Area already scheduled for an exercise, the NSCC will give consideration to canceling or rescheduling the exercise.

Drill or Exercise Participation Credit **–** When lesser included drills occur as part of larger exercises or a real event, the plan holder will receive credit for that lesser included drill and/or real event when properly documented. For example, if a plan holder responds to an actual spill, the activities involved in the spill response, i.e., the notification of the QI and the equipment deployment will satisfy the requirement for these two exercises, provided the actual response activity meets the objectives of the exercises and is properly documented.

Credit for a Federally Designated Area Exercise will be given to a plan holder for an actual response to a spill in the Federally Designated Area if the plan was utilized for response to the spill and/or if the plan was utilized for response to the spill and the objectives of the Federally Designated Area Exercise were met, and were properly documented and certified. The caveat to this statement is that if a plan holder was scheduled to conduct a Federally Designated Area Exercise and an actual spill occurred in the Federally Designated Area for which the plan holder's plan was NOT used, the plan holder would not receive credit for the spill response.

Drill Documentation **–** Proper documentation includes documentation that lists the drill conducted, the objectives met and the results of the drill evaluation. This documentation must be in writing and signed by a responsible individual such as an Field Manager or Regional Safety Coordinator within Lone Star NGL Mont Belvieu L.P..

Drill Requirements for Complexes – Complexes are facilities that must meet the requirements of more than one regulatory agency for developing spill response plans. For example, a facility that has truck loading racks or non-transportation related oil storage tanks, a pipeline and a waterfront oil transfer dock is considered a complex since it must meet the requirements of EPA, PHMSA and the Coast Guard.

Complexes will only be required to conduct one drill to meet all agency requirements for that particular type of drill. For example, if a quarterly notification drill is required by all three agencies regulating the complex, one notification drill per quarter will satisfy the requirements for all three regulatory agencies.

Federally-Designated Area or Facility-Specific Requirements **–** Specific Facility and Federally Designated Area Drill requirements are provided in the following subsections. These lists include: applicability, frequency, party initiating drill, participants, scope objectives, format, certification, verification, and records requirements for all Lone Star NGL Mont Belvieu L.P. facilities.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
FEDERALLY DESIGNATED AREA EXERCISES

Federally-Designated Area Requirements

Applicability: Federally Designated Area Response Community

Frequency: Triennially for each Federally Designated Area

Initiating Authority: USCG, EPA and industry

Participating Elements: Federal, State and Local Government and industry

Scope:

Federally Designated Area exercises will exercise the Federally Designated Area Response System. The Federally Designated Area exercise will focus on exercising the Area Contingency Plan along with selected industry response plans.

Objectives:

- Exercise the Area Contingency Plan, along with selected industry response plans.
- Exercise the Unified Command System with the appropriate players participating.
- Exercise the Spill Management Teams.
- Ensure proper notifications are made.
- Ensure adequate response equipment is activated for response to the exercise scenario. The extent of equipment activation shall be determined by the lead plan holder in consultation with the exercise design team.

Format:

Total annual exercises to consist of:

5	Coastal (Lead by the Coast Guard)
1	Inland (Lead by EPA)
10	Coastal (Lead by Industry)
4	Inland (Lead by Industry)
20	Exercise Total Per Year

- Federally Designated Area Exercises will be approximately 8 - 12 hours in duration.
- Exercise scenario to be determined by lead plan holder with the assistance of the exercise design team.
- The exercise will be in the real space, e.g. the actual command post that would be utilized for a spill.
- The exercise will be conducted in real time.
- Lessons learned about the Federally Designated Area, Area Contingency Plan (ACP) and response system will be shared nationwide.

Certification:

Certification involves the following actions by the OSC, in consultation with PHMSA, MMS, USCG or EPA:

- Ensure the exercise was completed.
- Ensure the exercise meets the required objectives in the PREP guidelines.
- Ensure the response plan was evaluated for effectiveness based on exercise performance.
- Documentation must be approved and signed by the OSC and the appropriate oversight agency.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS

and
FEDERALLY DESIGNATED AREA EXERCISES

Federally-Designated Area Requirements, continued

Records:

Retention: 3 years (USCG)
5 years (EPA)

Location: OSC

Evaluation:

Joint evaluation team to be comprised of Federal Government (USCG, EPA, PHMSA or MMS) State and Industry. Evaluation process to be developed.

Scheduling:

Scheduling of Federally Designated Area Exercises shall be done under a nationally coordinated system that involves Federal, State and local governments and plan holders, and that recognizes the unique needs of specific geographic regions of the country.

See Guiding Principles for further discussion on Federally Designated Area Exercise Scheduling.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS

Federally Designated Area Requirements

Applicability: Federally Designated Area

Frequency: Quarterly

Initiating Authority: On Scene Coordinator

Participating Elements: Key Elements of the Unified Command Structure (UCS) (federal, state and local government agencies)

Scope:

Exercise and test communication between OSC and key elements of the UCS.

Objectives:

Ensure that the key elements of the UCS know whom to call in the event of a discharge within the Federally Designated Area.

Ensure contact (telephonic, radio, message-pager, or facsimile) and confirmation is made with the OSC and key elements of the UCS.

Certification:

Self Certification

Verifications:

Verification to be conducted by the District/Region.

Records:

Retention: 3 years (USCG)
5 years (EPA)

Location: With the OSC

Evaluation:

By Federally Designated Area Committee.

Credit:

Plan holder may take credit for this exercise in the course of conducting routine business or other drills, provided that the objectives of the drill are met and the drill is properly recorded. Similarly, credit may be taken for an actual spill response when these objectives are met and proper records are generated.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
UNANNOUNCED DRILLS

Onshore Transportation - Related Pipelines Requirements

Applicability: Pipeline Operator

Frequency: Maximum of twenty (20) unannounced PHMSA drills conducted annually

Party Initiating Drill: PHMSA

Participating: Designated spill emergency response team members
OPS Staff
State and local government (optional)

Scope:

Demonstrate ability to respond to a worst-case discharge spill event.

Objectives:

Designated emergency response team members should demonstrate adequate knowledge of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan.

Format:

Unannounced tabletop exercise to discuss "strategic issues."

OPS will provide the Operator the following information at least 10 working days in advance: (1) Date, time, and location of drill, (2) expected drill duration, and (3) response zone to be exercised.

On the day of the drill, the pipeline operator will be provided the scenario and post-spill events. This information will be used to explore and discuss "strategic issues" that will help operators evaluate their response plans.

Certification:

By PHMSA personnel conducting drill. PHMSA will provide written certification of the drill date, participants, and response zone drilled.

Verifications:

By PHMSA personnel conducting drill.

Records:

Retention: 3 years

Location: Operator shall retain records as indicated in response plan.
PHMSA to retain verification records.

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper record generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
OPERATOR EQUIPMENT DEPLOYMENT DRILLS

Onshore Transportation - Related Pipelines Requirements

Applicability: Pipeline Operator

Frequency: As indicated by response plan and the triennial cycle

Party Initiating Drill: As indicated in response plan

Participants: Designated spill emergency response team members
Lone Star NGL Mont Belvieu L.P. Contracted Oil Spill Response Contractor (as appropriate)

Scope:

Demonstrate ability to deploy Operator spill response equipment.

Objectives:

Designed emergency response personnel should demonstrate:

1. ability to organize; and
2. deploy and operate representative types of key response equipment as described in response plan.

Format:

Announced deployment exercise indicated in response plan.

Certification:

Self-certification as indicated in response plan.

Self-certification that the guidelines are being satisfied will be biannually sent to PHMSA (15th of January and July) and entered into the PHMSA exercise database. PHMSA requests that the submitted documentation includes the Operator name, drill date, type of drill conducted, zone drilled, and participants.

Verifications:

Verification conducted by PHMSA during regular inspections or PHMSA tabletop exercises.

Records:

Retention: 3 years

Location: Operator shall retain records as indicated in response plan.
PHMSA to retain verification records.

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper recorded generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
INTERNAL TABLETOP EXERCISE

Onshore Transportation - Related Pipelines Requirements

Applicability: Pipeline Operator

Frequency: As indicated by response plan and the triennial cycle

Party Initiating Drill: As indicated in response plan

Participants: Designated spill emergency response team members

Scope:

Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.

Objectives:

Designed emergency response team members should demonstrate:

1. Knowledge of facility response plan,
2. ability to organize team members,
3. communication capability, and
4. coordination for response capability as outlined in response plan.

Format:

Internal tabletop drill as outlined in response plan.

Certification:

Self-certification as indicated in response plan or as defined in the Guiding Principles of this document, whichever is more stringent. Each plan should have a written description of the company's certification process.

Self-certification that the guidelines are being satisfied will be biannually sent to PHMSA (15th of January and July) and entered into the PHMSA exercise database. PHMSA requests that the submitted documentation includes the Operator name, drill date, type of drill conducted, zone drilled, and participants.

Verifications:

Verification conducted by PHMSA during regular inspections or PHMSA tabletop exercises.

Records:

Retention: 3 years

Location: Operator shall retain records as indicated in response plan.
PHMSA to retain verification records.

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper recorded generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
OPERATOR INTERNAL NOTIFICATION DRILLS

Onshore Transportation - Related Pipelines Requirements

Applicability: Pipeline Operator

Frequency: As indicated by response plan and the triennial cycle

Party Initiating Drill: As indicated in response plan

Participants: Designated spill emergency response team members

Scope:

Demonstration of the accessibility and notification capability of the Qualified Individual and designated spill emergency response team members.

Objectives:

Contacts (telephonic, radio, message-pager, or facsimile) and confirmation established as indicated in response plan.

Format:

As indicated in response plan.

Certification:

Self-certification as indicated in response plan. Each plan should have a written description of the company's certificate process.

Self-certification that the guidelines are being satisfied will be biannually sent to PHMSA (15th of January and July) and entered into the PHMSA exercise database. PHMSA requests that the submitted documentation includes the Operator name, drill date, type of drill conducted, zone drilled, and participants.

Verifications:

Verification conducted by PHMSA during regular inspections or PHMSA tabletop exercises.

Records:

Retention: 3 years

Location: Operator shall retain records as indicated in response plan.
PHMSA to retain verification records.

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper recorded generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS

Coast Guard Marine Transportation Related (MTR) &
EPA Regulated Facilities Requirements

Applicability: Facility

Frequency: Quarterly, or routine communication if it occurs on at least a quarterly basis

Initiating Authority: Company Policy

Participating Elements: Facility Personnel, Qualified Individual

Scope:

Exercise communications between facility personnel and Qualified Individual.

Objectives:

Contact must be made with a Qualified Individual or designee, as designated in the plan.

Certification:

Self Certification

Verifications:

Verification to be conducted by the appropriate agency during site visits.

Records:

Retention: 3 years (USCG)
5 years (EPA)

Location: Records to be kept at the facility.

Evaluation:

Self Evaluation

Credit:

Plan holder may take credit for this exercise in the course of conducting routine business or other drills, provided that the objectives of the drill are met and the drill is properly recorded. Similarly, credit may be received for an actual spill response when these objectives are met and a proper record generated.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
SPILL MANAGEMENT TEAM TABLETOP EXERCISE

Coast Guard Marine Transportation Related (MTR) &
EPA Regulated Facilities Requirements

Applicability: Facility Spill Management Team

Frequency: Annually

Initiating Authority: Company policy

Participating Elements: Spill Management Team as established in response plans.

Scope:

Exercise the Spill Management Team's organization, communication and decision making in managing a spill response.

Objectives:

- At least one Spill Management Team Tabletop Exercise in a triennial cycle shall involve simulation of a worst case discharge scenario.
- Exercise the Spill Management Team in a review of:
- Knowledge of the response plan.
- Proper notifications
- Communications system.
- Ability to access OSRO.
- Coordination of organization/agency personnel with responsibility for spill response.
- Ability to effectively coordinate spill response activity with National Response System infrastructure.
- Ability to access information in Area Contingency Plan for location of sensitive areas, resources available within the areas, resources available within the Federally Designated Area, unique conditions of Federally Designated Area, etc.

Certification:

Self-Certification

Verifications:

Verification to be conducted by responsible oversight agency.

Records:

Retention: 3 years (USCG)
5 years (EPA)

Location: At each facility – (for facilities)

Evaluation:

Self Evaluation

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper recorded generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS
and
EQUIPMENT DEPLOYMENT DRILLS

Coast Guard Marine Transportation (MTR) &
EPA Regulated Facilities Requirements

Applicability: Facilities with facility-owned response equipment

Frequency: Semiannually

Initiating Authority: Company Policy

Participating Elements: Facility Personnel
Lone Star NGL Mont Belvieu L.P. Contracted Oil Spill Response Contractor (as appropriate).

Scope:

Deploy and operate facility-owned response equipment identified in the response plan. Only a representative sample of each type of equipment or that which is necessary to response to an average most probably discharge, whichever is less, need be deployed.

The remainder of the equipment that is not deployed must be included in a comprehensive training and maintenance program. Credit will be given for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.

Objectives:

- Demonstrate ability of facility personnel to deploy and operate equipment.
- Ensure equipment is in proper working order.

Certification:

Self-Certification

Verifications:

Verification to be conducted by appropriate oversight agency during periodic site visits.

Records:

Retention: 3 years (USCG)
5 years (EPA)

Location: Records to be kept at the facility.

Evaluation:

Self-Evaluation

Credit:

Plan holder may take credit for this exercise when conducted in conjunction with other drills as long as all objectives are met and a proper recorded generated. Likewise, credit may be taken for an actual spill response when these objectives are met and a proper record generated.

*Note: If a facility with facility-owned equipment also identifies Oil Spill Removal Organization equipment in their response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO owned equipment.

QUALIFIED INDIVIDUAL NOTIFICATION DRILLS and UNANNOUNCED DRILLS

Plan Holders Requirements

Applicability: Response Plan holders within the Federally Designated Area

Frequency: Annually - A plan holder is not required to participate in a federal government initiated unannounced drill if they have participated in an unannounced federal or state oil spill response drill within the last 36 months.

Initiating Authority: USCG, EPA

Participating Elements: Response Plan holders

Scope:

- Unannounced exercises to be limited in scope, number and duration.
- Unannounced exercises will be limited to a maximum of four exercises per Federally Designated Area per year.
- Exercises will be limited to a maximum of four hours in duration.
- Exercises will involve response to an average most probable discharge scenario.
- Exercise will involve equipment deployment to respond to spill scenario.
- Neither the USCG nor EPA will require an unannounced exercise of a pipeline or platform not a part of a complex, since these will be covered by PHMSA and MMS.

Objectives:

- Conduct proper notifications to respond to unannounced scenario of an average most probable discharge.
- Demonstrate equipment deployment is: timely, conducted with adequate amount of equipment for scenario, and properly deployed

Exercise Preparation:

The Area Committee will meet annually to discuss details of the unannounced exercises to be conducted in the Federally Designated Area for that year. At this annual meeting, the Area Committee will consult with the initiating agency (USCG, EPA, PHMSA, MMS) to discuss the scenario development and requirements for each exercise.

Certification:

Initiating Agency (USCG, EPA, PHMSA, MMS)

Verifications:

Initiating Agency

Records:

Retention: 3 years (USCG, PHMSA, MMS)
5 years (EPA)

Location: At facility – for facility.
See 33 CFR 155.1060 ©(2) – for vessels

Evaluation:

Self-Evaluation

Credit:

Credit may be taken for an actual spill response when these objectives are met and a proper record generated. Plan holders participating in this exercise may also take credit for notification

and equipment deployment exercises.

SECTION 8.0 DISCHARGE VOLUMES AND PLANNING

Subsection ***Page Number***

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DISCHARGE VOLUMES AND PLANNING

Introduction

This section describes the Worst Case Discharge (WCD) as determined using the DOT method. Calculations of WCD volumes, locations, and planning distances are provided.

DOT-Regulated Facilities – Discharge Planning

The WCD scenario for DOT-regulated facilities within Response Zone 1 was projected for the largest above-ground storage tank at the Cedar Bayou Terminal. It hypothesizes a catastrophic tank failure and subsequent loss of distillate due to corrosion. Released material escapes the secondary containment area due to extremely heavy rains, flows east and enters Cedar Bayou. Cedar Bayou is hypothesized to be at 100-year flood velocities.

The WCD for coastal waters within Response Zone 1 was projected for pipeline P12 in Chambers and Harris County, Texas. It hypothesizes a catastrophic rupture and subsequent loss of product due to corrosion. Released material escapes the pipeline rupture and enters Cedar Bayou instantaneously.

WCD Volume Calculations – The worst case discharge is projected as a scenario involving a catastrophic failure of the (b) (3), (b) (7)(F) . This tank contains Ultra-low Sulfur Diesel No. 2 (distillate). This scenario would result in a release of (b) (7)(F), of distillate into Cedar Bayou in Chambers County, Texas.

49 CFR Part 194, Section 105, Paragraph (b)(4) states: “Operators may claim prevention credits for breakout tank secondary containment and other specific spill prevention measures as follows:

Prevention measure	Standard	Credit (percent)
Secondary containment > 100%	NFPA 30	50
Built/repaired to API standards	API STD 620/650/653	10
Overfill protection standards	API RP 2350	5
Testing/cathodic protection	API STD 650/651/653	5
Tertiary containment/drainage/treatment	NFPA 30	5
Maximum allowable credit		75

The secondary containment for the storage tanks at the Cedar Bayou Terminal meet all of the prevention measure criteria listed above according to the following information:

1. Secondary containment capacity for all of the tanks provides containment for more than 110% of the capacity of the largest above-ground storage tank.
2. All above-ground storage tanks at the Cedar Bayou Terminal are newly constructed to the appropriate API standards listed above.
3. Overfill protection is provided for all above-ground storage tanks at the Cedar Bayou Terminal in the form of separate high level alarms and shutdown instrumentation on each tank.
4. Cathodic protection is installed on each tank and testing will be conducted according to API standards.

Due to the fact that all of the pollution prevention measures are addressed, a 75% credit is applied to the capacity of the largest above-ground storage tank, which in turn generates a worst case discharge amount of (b) (7)(F), (b) (3)

The pipeline-based worst case discharge is projected as a scenario involving a (b) (3), (b) (7)(F) This pipeline carries processed petroleum product (Group 2, Persistent Oils) such as diesel. This scenario would result in a release of (b) (7)(F), of diesel fuel at C(b) (3), (b) (7)(F)

Calculations used to determine the pipeline-based WCD are as follows. The WCD volume for Zone 1 has been determined as the residual volume (in barrels – bbls) plus the volume pumped prior to system shutdown of a catastrophic rupture of the P12 10" pipeline. The residual volume for the pipeline was calculated using inventory line-fill volume measurements for the length of the line section between mainline valves. Using the entire length between mainline valves is a highly conservative approach which assumes the entire valved section volume will drain out, but due to changes in elevation along the length of the line-section, the probability of complete residual volume drain-down with the pumps off and terminal valves closed is low.

The volume of material released prior to system shutdown was calculated based on the following three assumptions:

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

Worst case discharge has been calculated as follows:

WCD = [(DT + ST) x FR] + Vol

DT = maximum release discovery time (minutes)

ST = maximum shutdown response time (minutes)

FR = maximum flow rate (bbls/day)

Vol = section volume (bbls)

* The DT and the ST are the maximum expected in adverse weather

Length (ft)	Diameter (in)	Volume (bbls)	Flow (bbls/day)	Discovery Time (minutes)	Shutdown Time (minutes)	WCD (bbls)
(b) (7)(F), (b) (3)						

WCD Location and Planning Distances – The Lone Star NGL Mont Belvieu L.P. Cedar Bayou Terminal is located approximately 1500 feet west of Cedar Bayou northwest of Mont Belvieu, Texas. The Lone Star NGL Mont Belvieu L.P. pipeline P12 stretches from the Mont Belvieu South Terminal to the TEPPCO Baytown Terminal. The location of the WCD is at the pipeline crossing at Cedar Bayou southwest of Mont Belvieu, Texas. Cedar Bayou is slightly tidally-influenced at the location of the potential entry point into the bayou of a release from the terminal. For planning purposes, it was assumed that a WCD could travel as far as 1 mile upstream on an incoming tide. On an outgoing tide, or during normal downstream flow, a WCD could travel the entire distance (12 miles) from the entry point to the entrance into Upper Galveston Bay (see Figure 3 located in Volume III). Additionally, a listing of public boat ramps and information on environmentally sensitive areas are included in Volume III.

Habitat-based Response Strategies

The Pipeline and Hazardous Materials Safety Administration (PHMSA) of the USDOT requires operators to establish strategies for recovering spilled material based on the types of environments and habitats that may be present in the response zone. While Lone Star NGL Mont Belvieu L.P. would consult with wildlife and habitat experts in areas of sensitive environments, the following discussion of habitat-based response strategies is provided as a general guidance for Lone Star NGL Mont Belvieu L.P. personnel.

For each habitat type there is a brief description of its physical characteristics, a discussion of sensitivity to spills, and a list of potential response strategies. Under situations where spills occur in environmentally sensitive areas that are specifically addressed in the Regional/Area Contingency Plans (R/ACPs), Lone Star NGL Mont Belvieu L.P. and/or their contractors would defer to the R/ACP for specific strategies that are outlined for each area of concern. Placement of boom at key locations would be done according to the R/ACPs.

For key sensitive areas known within the Response Zone, specific strategies are outlined after this subsection under Sensitive Area Response Strategies. The QI will consult this subsection in addition to the latest version of the R/ACPs in the event that a release occurs within key sensitive areas. In addition, the QI will rely on the maps located in Volume III to determine locations of specific areas that may be of concern during spill response activities. It is important to note that consultation with area experts is paramount in protection of sensitive resources to ensure that the most up-to-date data are available to the response team. While timing of actions is critical to detain oil and minimize impacts, it is also important to obtain concurrence with local experts on prioritization of spill response strategies.

Maximum response times for implementation of these strategies would depend on the location of the incident along the pipeline. For locations near existing Lone Star NGL Mont Belvieu L.P. Terminals and pump stations, the maximum response times can be found in Section 5.0 – Notification Telephone Directory under Facility Response Teams. Additional support will be provided by the OSROs under contract with Lone Star NGL Mont Belvieu L.P.. Maximum response times to the pipeline system for the OSROs can be found in Section 5.0 – Notification Telephone Directory under Response Contractors.

Habitat-based Response Strategies

WETLANDS (Including tidal flats, salt and brackish water marshes, freshwater marshes and swamps, bogs, bottomland hardwood forests) – Wetlands are characterized by the presence of water, unique soils that differ from adjacent upland areas, and vegetation adapted to wet conditions. Wetlands include a range of habitats such as marshes, bogs, bottomland hardwood forests, prairie potholes, and swamps. Substrate, vegetation, hydrology, seasonality, and biological use of inland wetlands are highly variable, making characterization difficult. The surfaces of wetlands usually have a low gradient and vegetated areas are typically at or under the water level. There can be distinct channels or drainages with flowing water, except at the exposed outer fringe where natural physical processes are minimal. Water levels may vary seasonally, and the wetland may be simply a zone of water-saturated soils during the dry season.

Wetlands are highly sensitive to oil spills. The biological diversity in these habitats is significant and they provide critical habitat for many types of animals and plants. Oil spills affect both the habitat (vegetation and sediments) and the organisms that directly and indirectly rely on the habitat. Surprisingly little is known about oil impact on freshwater plants, although there are likely differences between robust perennials with substantial underground systems and cycles of winter die-back, and annuals that lack underground nutrient reserves. Detritus-based food webs are fundamentally important in wetlands; oil could possibly affect these by slowing decomposition rates of plant material.

Wetlands support populations of fish, amphibians, reptiles, birds, and mammals, with many species reliant upon wetlands for their reproduction and early life stages when they are most sensitive to oil. Many endangered animals and plants occur only in wetlands, and spills in such areas would be of particular conservation concern. Migratory waterfowl depend heavily on wetlands as summer breeding locations, migration stopovers, and winter habitats. The threat of direct oiling of animals using the wetland often drives efforts to remove the oil. If oil and/or cleanup efforts causes a loss of the more sensitive plants or modifies the ecosystem structure, then feeding and breeding of dependent wildlife may be affected

Tidal Flats – Tidal flats are composed primarily of silt and clay with minor amounts of sand and shell.

They are present in calm-water habitats, sheltered from major wave activity, and are frequently fronted by marshes. The sediments are very soft and cannot support even light foot traffic in many areas. Large populations of shellfish, worms, and snails are often found in this habitat. Tidal flats are heavily utilized by birds for feeding and roosting.

Response Strategy*

- Use deflection or sorbent booms and open water skimmers.
- Use low-pressure flushing and deploy sorbents from shallow-draft boats where feasible.

*Note: Tidal flats are high-priority areas necessitating the use of spill protection devices to limit oil-spill impact. Cleanup of the flat surface is very difficult because of the soft substrate. Many methods may be restricted.

Salt and Brackish Water Marshes – Salt marshes are North America's dominant coastal wetlands. These low-growth habitats are located behind barrier beaches and along estuaries and are made up mainly of non-woody plants. These marshes are regularly inundated with salt water. With each tidal cycle, salt marshes are drained of wastes and then reflooded with nutrients. This flushing action is what makes them one of the richest habitats on earth. They offer protected spawning places for thousands of marine organisms and feeding grounds for a host of aquatic and terrestrial predators. In addition, salt marshes generate excess nutrients that nourish nearby estuaries, bays, and coastal seas.

Saltmarsh grasses, especially cordgrasses of the genus Spartina, are the primary vegetation of tracts inundated at high tide. Other distinct species of saltmarsh plants include the succulent glassworts, which range in color from green to brilliant red and add splashes of color to marsh habitats. Salt-tolerant plants play an important ecological role in this environment: they build and maintain peat layers by trapping sediment with their roots, and provide habitat and food for fish, fiddler crabs, mussels, and other marsh animals. At the upper edges of the marshes, delicate Sea Lavender, Saltmarsh Fleabane, and the large pink-blossomed Seashore and Marsh Mallows are characteristic flowering plants.

Response Strategy*

- Under light oiling, the best practice is to let the area recover naturally.
- Heavy accumulations of pooled oil can be removed by using vacuums, sorbents, or low-pressure flushing. During flushing care must be taken to prevent transporting oil to sensitive areas down slope or along shore.
- Cutting of oiled vegetation should only be considered when other resources are at great risk from leaving oiled vegetation in place.

*Note: Cleanup activities should be carefully supervised to avoid vegetation damage. Trampling of the roots must be minimized. Any cleanup activity must not mix the oil deeper into the sediments.

Fresh Water Marshes, Swamps and Bogs – A marsh is a wetland with shallow standing water, usually throughout the year, saturated soil, and few or no trees. Marshes form along slow-moving streams and at pond and lake borders, and may be alkaline or acidic. Marsh plants, generally herbaceous, may be emergent (rooted in shallow water) or floating species. Reeds, sedges, rushes, tules, and grasses are most numerous, and arrowheads, cattails, water lilies, and bur-marigolds are also common. The cattail is one of the most common marsh plants but in many areas it is being muscled out by the non-native, invasive Purple Loosestrife and Common Reed.

Swamps are freshwater wetlands with shrubs or trees, rather than just herbaceous plants, as in marshes. Common throughout eastern North America, swamps tend to have one or two dominant trees species, although numerous tree species may occur.

Wet, spongy areas rich in plant residue, bogs are home to many unusual life-forms. Bogs form where water accumulates and sits. Lack of water movement produces low oxygen levels and high acidity, conditions few plants can tolerate. Carnivorous plants, including sundews and pitcher plants, and other bog plants, such as sedges, heaths, bog orchids, and sphagnum mosses, are chemically adapted to survive in this nutrient-poor environment and often grow in a thick mat. Surrounded by tree species that vary by locale, including Tamaracks, Red Spruces, and Pitch Pines, bog waters are usually tea-colored, the result of tannins from fallen leaves leaching into the water.

Response Strategy*

- Under light oiling, the best practice is to let the area recover naturally.
- Heavy accumulations of pooled oil can be removed by using vacuums, sorbents, or low-pressure flushing. During flushing care must be taken to prevent transporting oil to sensitive areas down slope or along shore.
- Cutting of oiled vegetation should only be considered when other resources are at great risk from leaving oiled vegetation in place.

*Note: Cleanup activities should be carefully supervised to avoid vegetation damage. Trampling of the roots must be minimized. Any cleanup activity must not mix the oil deeper into the sediments.

Bottomland Hardwood Forests – Bottomland wetlands are plant communities that have been created as a result of the actions of creeks, rivers, and floodplains. The bottomland hardwood forest is a part of a system that starts at a river's headwaters and ends in an estuary at the ocean. Trees found in the bottomland hardwood forests include bald cypress, pecan, oaks, elm, cottonwood, and hackberry. These hardwoods, particularly old-growth hardwoods (50 to 100 years old) contribute to the biodiversity of the wetland system. They also provide food and shelter for wildlife.

Response Strategy*

- Under light oiling, the best practice is to let the area recover naturally.
- Use berms or barriers to stop any surface flow of product.
- Heavy accumulations of pooled oil can be removed by using vacuums, sorbents, or low-pressure flushing. During flushing care must be taken to prevent transporting oil to sensitive areas down slope or along shore.
- Heavy oiling may require excavation of impacted soils in areas where minimal vegetation damage is possible.

*Note: Cleanup activities should be carefully supervised to avoid vegetation damage. Trampling of the roots must be minimized. Any cleanup activity must not mix the oil deeper into the sediments.

Piney Woods - Sandhill pine forests are one of the communities' characteristic of the Piney Woods. Long-leaf pine (Pinus palustris) shares dominance with shortleaf pine (Pinus echinata) and loblolly pine (Pinus taeda). In this flatwood like habitat, pines dominate the overstory with a well-developed woody understory. Pine density is low, the herb layer is sparse, and exposed sandy tracts are common. Common associated trees are bluejack oak (Quercus incana) and post oak (Q. stellata), with a characteristic understory of Yaupon (Ilex vomitoria) and flowering dogwood (Cornus florida). Savanna-like areas occur on poorly drained soils and contain scattered individuals of longleaf and loblolly pine along with tupelo (Nyssa sylvatica) sweet gum (Liquidambar styraciflua) and magnolia (Magnolia virginiana). The interaction of moisture and fire frequency determines vegetation structure and composition. In other sections oaks and hickories are mixed in with pines.

Response Strategy*

- Under light oiling, the best practice is to let the area recover naturally.
- Use berms or barriers to stop any surface flow of product.
- Heavy accumulations of pooled oil can be removed by using vacuums, sorbents.
- Heavy oiling may require excavation of impacted soils in areas where minimal vegetation damage is possible.

*Note: Cleanup activities should be carefully supervised to avoid vegetation damage. Trampling of the roots must be minimized. Any cleanup activity must not mix the oil deeper into the sediments.

Small lakes and ponds – Lakes and ponds are standing bodies of water of variable size and water depth. Waves and currents are generally very low, although the water surface can become choppy. Water levels can fluctuate widely over time, particularly on manmade lakes. Smaller ponds can completely freeze over in winter. The bottom sediments close to shore can be soft and muddy, and the surrounding land can include wet meadows and marshes. Floating vegetation can be common.

The rate of water exchange is highly variable within this group, ranging from days to years. These water

bodies can include sections of a river with low flow rates (e.g., behind diversion dams) or that are somewhat isolated from regular flow (e.g., backwater lakes or oxbow lakes). Isolated water bodies, such as kettle lakes, are unique members of this category because they have no surface water outflow, and therefore have very low flushing rates. In shallow water, boat operations would be limited and most response operations would be conducted from shore.

Response Strategy

- Use booms to keep oil from spreading
- Heavy accumulations of pooled oil can be removed by using vacuum, sorbents, or low-pressure flushing. During flushing, care must be taken to prevent transporting oil to sensitive areas down slope or along shore.
- Under light oiling, natural attenuation may be possible

Small Rivers and Streams – Small rivers and streams are characterized by shallow water (generally 1-2 meters) and narrow channels. Water flow can be highly variable, both throughout the seasons and with distance downstream. This grouping includes a wide range of waterbodies, from fast-flowing streams with low falls and numerous rapids over bedrock and gravel, to slow-moving bayous bordered by low muddy banks and fringed with vegetation. Sections of the channel may be choked with log jams and debris, and mid-channel bars and islands can divide water flow into multiple channels. Both boat and vehicular access can be very limited.

Response Strategy

- Use booms to keep oil from spreading.
- Heavy accumulations of pooled oil can be removed by using vacuum, sorbents, or low-pressure flushing. During flushing, care must be taken to prevent transporting oil to sensitive areas down slope or along shore.
- Under light oiling, natural attenuation may be possible.

Sensitive Area Response Strategies

Lone Star NGL Mont Belvieu L.P.'s pipeline system intersects numerous sensitive areas and crosses many waterways within the response zone. Spill response strategies to be implemented near these sensitive areas shall be determined on a case-by-case basis, depending on the magnitude of the spill event and weather conditions. Booms will be used where possible to mitigate the migration of oil downstream and/or into adjacent wetland areas.

Within the coastal zone, specific areas of concern and response strategies are included in Volume III – Response Maps. For further information regarding the coastal natural resources and spill response actions, the response team should consult the One Gulf Plan and associated Site Specific Response Sheets.

SECTION 9.0 MSDS DOCUMENTS FOR TRANSPORTED PRODUCTS

Subsection ***Page Number***

MSDS DOCUMENTS FOR TRANSPORTED PRODUCTS

Lone Star NGL Mont Belvieu L.P. is a common carrier pipeline system transporting shipper-owned petroleum products. The following are representative Material Safety Data Sheet (MSDS) documents for the petroleum products transported through the pipeline system. The MSDS documents are provided in alphabetical order as follows:

- MSDS for Diesel Fuel-#2 Fuel Oil
- MSDS for Gasoline, Regular Unleaded
- MSDS for Gasoline, Premium Unleaded

NOTE: Retention of MSDS information for non-transported products is the responsibility of each facility or Field Manager. A copy must be kept at the appropriate facilities for quick reference.

SECTION 10.0 FORMS

SECTION 11.0 MAPS AND PLOT PLANS