H2S - 053

H2S Contingency Plan Pipelines

Chavez, Carl J, EMNRD

From: Henry, Rachael M < RMHenry@dcpmidstream.com>

Sent: Saturday, February 3, 2018 10:44 AM

To: Chavez, Carl J, EMNRD

Cc:Griswold, Jim, EMNRD; Yu, Olivia, EMNRDSubject:RE: DCP Midstream Emergency Response Plan

Attachments: Covered Task 0100OP - Inspect Test and Maintain Computational Pipeline Monitoring

(CPM) Sensing Devices.pdf

Mr. Chavez,

I apologize for not explaining this in my previous e-mail communication. Section 2.9 in the DCP Midstream Emergency Response Plan is not populated on purpose as during our emergency response training of the written plan, we refer to Section 2.4 for emergency response actions required for pipeline release scenarios. The reason Section 2.9 is not populated is because the emergency response steps we take for pipeline releases are identical to the steps described in Section 2.4 Spills & Gas Release Procedures. These steps are what we train our employees to take in the event of a pipeline emergency scenario.

It is probably more than you are wanting to review, however, I have enclosed an excerpt of a training evaluation document we use for our employees responsible for monitoring pipelines. Although Section 2.4 in the ERP describes our initial response to a pipeline emergency scenario, the enclosed document describes some of the additional training we conduct to ensure our employees understand how to adequately monitor our pipelines and hence respond appropriately.

Please let me know if you have any further questions as I'm glad to assist.

Thank you.
Rachael Henry, CSP
Health & Safety Manager, Permian Region
432-488-6262 (mobile)
DCP Midstream



From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]

Sent: Thursday, February 01, 2018 3:53 PM

To: Henry, Rachael M

Cc: Griswold, Jim, EMNRD; Yu, Olivia, EMNRD

Subject: RE: DCP Midstream Emergency Response Plan

Rachel:

Please send me Section 2.9. It appears to be absent from your submittal.

Thank you.

From: Henry, Rachael M [mailto:RMHenry@dcpmidstream.com]

Sent: Thursday, January 18, 2018 12:26 PM

To: Chavez, Carl J, EMNRD < Carl J. Chavez@state.nm.us>

Cc: Griswold, Jim, EMNRD < Jim.Griswold@state.nm.us>; Yu, Olivia, EMNRD < Olivia.Yu@state.nm.us>

Subject: DCP Midstream Emergency Response Plan

Mr. Chavez,

Happy New Year! As requested, I have attached a document in this e-mail containing excerpts from one of the DCP Midstream Emergency Response Plans. I only included the pages I thought you'd find appropriate for your review relating to how our company responds to emergencies in general (sweet/sour pipelines included). Of course for our facilities, that are required to have H2S Contingency Plans, we implement those indicated emergency actions as well. Our H2S Contingency Plans are referenced in the general ERP for the operating area where they apply. Please let me know should you have any questions.

Thank you.

Rachael Henry, CSP Health & Safety Manager, Permian Region 432-488-6262 (mobile) DCP Midstream



Evaluation Criteria

Covered Task 011OP - Inspect, Test and Maintain Computational Pipeline Monitoring (CPM) Sensing Devices

Evaluation Criteria

Evaluation Method:
Observation & Oral Exam.

49 CFR 192 Reference

N/A

49 CFR 195 Reference

195.444

Subsequent Qualification Interval

3 Years

Span of Control

1:

Supporting Documentation Required (If training is required, appropriate training documentation must be submitted with this ROE.)

None

K/S

K 1. Explain what is required prior to performing task

a)Appropriate procedures (e.g.; Operator procedure, manufacturer OEM, etc.)

b)Appropriate equipment/materials

K 2. Identify and describe how pressure switches; pressure, temperature and differential transmitters work in CPM service.

a)Pressure switches cause other protection devices to activate at predetermined setpoints.

b)Pressure/temperature transmitters provide a variable signal based upon varying pressures/temperatures on the pipeline to other logic devices that can cause other protection devices to activate at pre-determined setpoints.

S 3. Demonstrate how to test, maintain and calibrate switches and transmitters:

a) Verify required setpoint pressures

b)Record setpoint 'as found'.

c)Select the appropriate test media to be applied

d)Inspect for conditions that might prevent proper operation; clean, repair or replace the device as necessary.

e)Test the device to insure proper operation and to ensure that it is set to function correctly; adjust or repair as necessary

f)Place the device back in service, check for leaks and return to normal operating conditions.

g)Record setpoint 'as left'.

Abnormal Operating Conditions

Unintentional release, vapors, or hazardous atmosphere. (examples could include, but not limited to; puddles, dead vegetation, vapor cloud, ice ball)

Response/Reaction:

*Eliminate potential ignition sources

*Move to safe location

*Notify emergency response personnel, as appropriate

*Limit access to location, as necessary

Covered Task 011OP - Inspect, Test and Maintain Computational Pipeline Monitoring (CPM) Sensing Devices

ROE Revision Date 09/18/2014

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Task 011OP-Rev 2 - 11/27/2013

*Follow appropriate procedures for notification, documentation, and remedial action.

Material defects, anomalies, or physical damage of pipe or a component that has impaired or is likely to impair the serviceability of the pipeline. (Examples could include, but not limited to: mechanical damage, evidence of corrosion, damaged transmitter/switch, corroded switch contacts, plugged devices)

Response/Reaction:

- *Determine extent, cause and potential hazard(s) of defect, anomaly, and/or damage
- *Mark the location so it may be easily located, as appropriate
- *Follow appropriate procedures for notification, documentation, and remedial action.

Failure or malfunction of pipeline component(s) (Examples could include, but not limited to: gasket failure, valve leaking, loose fitting, unintended opening or closing of valve)

Response/Reaction:

- *Determine extent, cause and potential hazard(s) of failure and/or malfunction
- *Follow appropriate procedures for notification, documentation, and remedial action.

Pipeline variable (pressure, temperature, etc.) exceeds device setpoint during testing.

Response/Reaction:

*Follow apropriate procedures for notification, documentation, and remedial action.

Instructions for Submitting Documents

Following successful completion of this evaluation:

- 1. Log in to VeriSource
- 2. Select 'I want to submit an evaluation' from The Online ROE Menu
- 3. Fax to 1-866-447-9104, or scan and email to roes@veriforce.com (PDF or TIF files only) in this order:
 - a. Qualification Submittal Form,
 - b. Page 1 of Record of Evaluation,
 - c. Attach applicable Supporting Documentation.

Chavez, Carl J, EMNRD

From: Henry, Rachael M < RMHenry@dcpmidstream.com>

Sent: Thursday, January 18, 2018 12:26 PM

To: Chavez, Carl J, EMNRD

Cc: Griswold, Jim, EMNRD; Yu, Olivia, EMNRD **Subject:** DCP Midstream Emergency Response Plan

Attachments: DCP Midstream Emergency Response Plan Excerpts.pdf

Mr. Chavez,

Happy New Year! As requested, I have attached a document in this e-mail containing excerpts from one of the DCP Midstream Emergency Response Plans. I only included the pages I thought you'd find appropriate for your review relating to how our company responds to emergencies in general (sweet/sour pipelines included). Of course for our facilities, that are required to have H2S Contingency Plans, we implement those indicated emergency actions as well. Our H2S Contingency Plans are referenced in the general ERP for the operating area where they apply. Please let me know should you have any questions.

Thank you.

Rachael Henry, CSP Health & Safety Manager, Permian Region 432-488-6262 (mobile) DCP Midstream





Linam Ranch / Hobbs Plants and Gathering System

ERP

Plan Last Revised: 01/18/2018



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Linam Ranch / Hobbs Plants and Gathering System	тос -
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1.1 PURPOSE / SCOPE OF PLAN

This Emergency Response Plan (ERP) applies to facilities operated by DCP Midstream, and affiliated companies herein referred to as "Company." An overview map of facilities covered by this ERP is included in **FIGURE 1.3**.

This ERP provides guidelines to assist in responding to and managing an emergency. The primary goal of this ERP is to provide tools to enable an efficient, coordinated and effective response to emergencies.

This ERP contains written guidelines to evaluate and to respond to an incident to prevent or to minimize personal injury or loss of human life, to avoid environmental hazards and to reduce damage to property.

This ERP contains procedures for the following:

- Safety considerations;
- Immediate notification to initiate appropriate response;
- · Compliance with regulatory notification requirements;
- · Rapid response to the incident with all available resources;
- · Establishment of agency and public liaison at the site;
- · Contractor, third party and public relations communication procedures; and
- · Training of individuals involved in emergency response and cleanup operations.

Initial Response Procedures for typical incidents are described in SECTION 2.

This ERP is not meant to replace common sense or actions not specifically described herein. Responders should continually evaluate the effectiveness of actions called for in this ERP and make the appropriate adjustments based on past experience and training to most effectively mitigate the incident.

SECTION 2 ACTION PLANS

Last Revised: February 2009

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- 2.1 Incident Command System
- 2.2 Evacuation
 - 2.2.1 Evacuation Procedure
- 2.3 Fire/Explosions
 - 2.3.1 Fire Fighting and Explosion Procedure
 - 2.3.2 Fire Fighting Tactics
 - 2.3.3 Boilover/BLEVE Boiling Liquid Expanding Vapor Explosion
- 2.4 Spills and Gas Release Procedures for Facilities
 - 2.4.1 Gas Release
 - 2.4.1.1 Gas Release Procedure
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 - 2.4.1.3 Gas Release Tactics
 - 2.4.2 Liquid Spill/Release Procedure
 - 2.4.3 Transportation Incident Procedure
- 2.5 Medical Emergency/Personal Injury Plan
 - 2.5.1 Medical Emergency/Personal Injury Procedure
- 2.6 Bomb Threats
 - 2.6.1 Bomb Threat Procedure
 - 2.6.2 Bomb Threat Notification Form
 - 2.6.3 Bomb Threat General Information
- 2.7 Civil Disturbance

SECTION 2 ACTION PLANS, CONTINUED

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- 2.7.1 Civil Disturbance Procedure
- 2.8 Natural Disasters
 - 2.8.1 Earthquake Procedure
 - 2.8.2 Flooding Procedure
 - 2.8.3 Hurricane Procedure
 - 2.8.4 Tornado Checklist
- 2.9 Pipeline Release Procedures
 - 2.9.1 Gas Transmission
 - 2.9.2 Gas Gathering
 - 2.9.3 Liquid

2.1 INCIDENT COMMAND SYSTEM

The Incident Command System (ICS) integrates responders into the Facility Management Team to effectively coordinate response efforts. For any emergency, the initial Incident Commander (IC) is the Facility Operations Supervisor. The IC designation will be passed on to a higher level of management, such as an Asset Manager, if the conditions of the incident warrant. It is the responsibility of the IC to determine what level of ICS is necessary to manage the incident. The IC will be responsible for designating roles to individuals to carry out the ICS.

2.2 EVACUATION

Evacuation may become necessary to protect personnel and the public from hazards associated with an incident. Orderly evacuation is essential to protect the general public, as well as Company personnel and property.

Prior to any incident the Facility Management shall determine safe evacuation routes and assembly areas to reduce confusion, if evacuation becomes necessary. The Facility Operator may also assign runners to direct evacuation and account for all personnel during emergencies.

Designated Assembly Areas shall be at a safe distance from the incident in an appropriate direction (up wind, up stream, and up grade). If the Assembly Areas do not provide adequate shelter, transportation to a central shelter should be arranged after all personnel are accounted for. As the incident progresses, the IC must continuously evaluate the adequacy of the assembly area and necessity of the shelter.

Personnel evacuating their work areas should shut down all operating equipment, secure all sensitive materials, shut off water and electrical power and proceed to the Designated Assembly Area. Facility personnel will account for all personnel, ensure the evacuated area is secured and report the status of the evacuation to the IC. Evacuated personnel shall remain at the assembly area or shelter until directed otherwise by the IC.

Local law enforcement and/or emergency management authority must be notified in conjunction with any community evacuation or public protective measures initiated.

2.2.1 Evacuation Procedure

2.2.1 Evacuation Procedure ACTION 1. Sound facility alarm. 2. Shut down operating equipment and proceed to the designated assembly area. 3. Account for all personnel. 4. Establish a secure perimeter around the evacuated area to prevent unauthorized entry. 5. Ensure adequate medical care for injured personnel. Initiate medical emergency procedure as required. 6. Notify local fire, EVS and law enforcement of the evacuated area, the reason for evacuation and the location of the assembly areas. 7. Notify Region Management, as appropriate. (SECTION 4.0) 8. Assess public exposure and initiate evacuation of surrounding homes, businesses, etc., with assistance from local law enforcement officials, as necessary. 9. Make appropriate government agency notifications. (SECTION 4.0) 10. Conduct post-incident activities. (SECTION 7.0)

2.3.1 Fire Fighting and Explosion Procedure

16. Conduct post-incident activities. (SECTION 7.0)

2.3.1 Fire Fighting and Explosion Procedure 1. Discontinue all tasks in progress (hot work, truck loading, maintenance, etc.) 2. Sound the facility fire alarm, if available. 3. Attempt to extinguish incipient stage fires, if trained to do so. 4. Report the condition to the Facility Operator and take further defensive actions as instructed. 5. Evacuate personnel to designated assembly areas. 6. Account for personnel. 7. Engage emergency shutdown systems and/or manually (from a safe distance) isolate fuel sources, shut down engines and heaters. 8. Initiate rescue activities as necessary, if properly trained. 9. Notify Facility Supervisor and make appropriate notifications to local fire and EMS. Make other internal management contacts as appropriate. (SECTION 4.0) 10. Establish a secure perimeter around the area to prevent unauthorized entry. 11. Initiate Site Security Plan. (SECTION 6.2) 12. Continue measures to contain the fire, apply water from a safe distance to protect adjacent equipment, if necessary. 13. Recognize fire conditions which present BLEVE or boilover hazards and protect personnel and the public appropriately. (SECTION 2.3.3) 14. Contain spilled material and runoff. Dike far ahead of the release, as necessary. 15. Make appropriate government agency notifications. (SECTION 4.0)

2.4.1.1 Gas Release Procedure

2.4.1.1 Gas Release Procedure

ACTION

- 1. Report the release to Facility Operator.
- 2. Sound the facility alarm.
- 3. Evacuate personnel from the immediate area to the designated assembly area or to a location upwind of the release.
- 4. Account for personnel,
- 5. Engage emergency shutdown systems and/or manually isolate release from a safe distance.
- 6. Establish a secure perimeter around the area to prevent unauthorized entry.
- 7. Notify Facility Supervisor and make other internal notifications as appropriate.
- 8. Assess the threat to the public and notify public officials as appropriate.
- Initiate evacuation of surrounding homes, businesses, etc. with assistance from local law enforcement officials, as necessary.
- 10. Confirm the following data:
 - Location of release
 - Time of occurrence or discovery
 - · Injuries or fatalities, if any
 - Cause of release
 - · Amount and type of material released
 - · Present location and path of release
 - · Potential of release to affect public
 - Weather conditions (Current and Forecast)
 - Potential containment actions

2.4.1.1 Gas Release Procedure, Continued

2.4.1.1 Gas Release Procedure, Continued	
ACTION, Continued	
11. Initiate Site Safety Plan. (SECTION 6.3)	
12. Make appropriate government agency notifications. (SECTION 4.0)	
13. Conduct post-incident activities. (SECTION 7.0)	

2.4.1.2 H2S Release Procedure

2.4.1.2 H2S Release Procedure ACTION 1. Activate H₂S alarm, if available. 2. Notify Facility Operator and take defensive action as instructed. 3. Evacuate all facility personnel to the designated assembly area or to a location upwind of the release. 4. Account for personnel. 5. Engage emergency shutdown systems, if available. 6. Initiate rescue activities, as necessary (re-entry into areas of unknown H2S concentration will require the use of SCBA and "back-up" personnel). 7. Notify Facility Supervisor and make other internal notifications as appropriate. 8. Establish a secure perimeter around the area to prevent unauthorized entry. 9. Initiate the facility Site Security Plan (H₂S Contingency Plan, etc.). (SECTION 6.2) 10. Assess the threat to the public and notify public officials as appropriate. 11. Initiate evacuation of surrounding homes, businesses, etc, with assistance from local law enforcement officials, as necessary. 12. If injuries exist, initiate the medical emergency procedure. 13. Manually isolate release from a safe distance utilizing appropriate personal protective equipment and "back-up" 14. Make appropriate government agency notification. (SECTION 4.0) 15. Conduct post-incident activities. (SECTION 7.0)

2.4.1.3 Gas Release Tactics

Upon discovering a release:

- Protect surrounding exposed areas, isolate all sources of potential ignition, and isolate the release source with the emergency shutdown system or by manually blocking in critical valves.
- Withdraw personnel and notify public safety officials.

Safety Guidelines:

- Any efforts made to rescue personnel and protect property or the environment must be weighed against the
 possibility that you could become part of the problem.
- Evacuate and account for personnel, as necessary.
- · Continually reassess the situation and modify the response accordingly.
- · Do not walk into or touch spilled materials.
- Do not assume vapors or gases are harmless because of lack of odor Harmful gases or vapors may be odorless.

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

2.4.2 Liquid Spill/Release Procedure

2.4.2 Liquid Spill/Release Procedure ACTION Initial Response Steps 1. Report the release to Facility Operator. 2. Sound the facility alarm. 3. Evacuate non-essential personnel from the immediate area to the designated assembly area. 4. Account for personnel. 5. Engage emergency shutdown systems and/or manually isolate release from a safe distance, if necessary. 6. Establish a secure perimeter around the area to prevent unauthorized entry. 7. Notify Facility Supervisor and make other internal notifications as appropriate. 8. Confirm the following data: • Location of release • Time of occurrence or discovery • Injuries or fatalities, if any • Cause of release

Potential containment actions
 Assess the threat to the public and notify public officials as appropriate.

Amount and type of material released
 Present location and path of release
 Weather conditions (Current and Forecast)

Initiate evacuation of surrounding homes, businesses, etc., with assistance from local law enforcement officials, as necessary.

2.4.2 Liquid Spill/Release Procedure, Continued

2.4.2 Liquid Spill/Release Procedure, Continued

Initial Response Steps, Continued

- 11. Initiate site security plan, including vessel movement on navigable waterways.
- 12. Initiate source control and containment activities.

Land

- · Block storm drains, close culvert valves
- Construct containment/diversion berms
- Use trenches and dikes as appropriate

Water

- . Deploy boom and use skimmers, if possible to minimize extent of spill and protect the shorelines
- Track spill movement
- 13. Dispatch response contractors.
- 14. Develop and implement plan of action.
- 15. Consider need for additional/specialized company resources (i.e., industrial hygiene, security, public relations).
- 16. Make appropriate government agency notifications. (SECTION 4.0)

Post-Incident Activities

- 1. Establish safe areas based on air monitoring data.
- 2. Establish site safety procedures and communicate to site workers.
- 3. Contact Environmental Representative for disposal options.
- 4. Conduct post-emergency activities. (SECTION 7.0)

2.4.3 Transportation Incident Procedure

2.4.3 Transportation Incident Procedure

ACTION

- 1. Review the Spill/Release Procedure (SECTION 2.4.2) and take all appropriate actions.
- 2. When notifying public safety officials, include hazard communication information:
 - Product identity
 - Quantity
 - Physical and health hazards
 - Other information
- Determine the need to contact CHEMTREC.
 - 4. Make appropriate government agency notifications. (SECTION 4.0)
 - 5. Conduct post-incident activities. (SECTION 7.0)

2.5.1 Medical Emergency/Personal Injury Procedure

2.5.1 Medical Emergency/Personal Injury Procedure

ACTION

- 1. Assess the scene; protect yourself.
- 2. Summon EMS to the scene; provide information on the nature and number of injuries. (SECTION 4.0)
- If trained, provide First Aid/CPR, as necessary, until EMS arrives at the scene; injured personnel should not be moved unless the situation is life threatening.
- 4. Evacuate unnecessary personnel from the area.
- 5. Establish a secure perimeter around the area to prevent unauthorized entry.
- 6. Initiate the Site Security Plan. (SECTION 6.2)
- Notify Facility Supervisor and make appropriate notifications to local fire and EVS. Make other internal management contacts as appropriate. (SECTION 4.0)
- 8. In case of a fatality:
 - Do not move the victim
 - Do not release name of victim(s)
 - Contact local law enforcement
 - Contact local medical examiner
 - · Preserve the accident site
 - · Restrict all radio communications concerning the incident.
- 9. Make appropriate government agency notifications. (SECTION 4.0)
- 10. Conduct post-incident activities. (SECTION 7.0)

10. Conduct post-incident activities. (SECTION 7.0)

2.6.1 Bomb Threat Procedure

2.6,1 Bornb Threat Procedure **ACTION** 1. Notify the Facility Supervisor and make other internal notifications, as appropriate. 2. Secure the area; Do not use radios within 1,000 feet (305 meters) of suspected bomb. • Do not engage electrical switches. 3. Evaluate danger to personnel considering: Level of security currently in place Degree of social unrest · Contents of the threatening message 4. Account for personnel. 5. Establish an Evacuation Plan based on presumed location and estimated explosion time of bomb. (SECTION 2.2) 6. Make notifications and summon assistance with local law enforcement agencies. (SECTION 4.0) 7. Establish communications with emergency responders and law enforcement officials. 8. Consider need for fire fighting capabilities. 9. Stop product transfer operations, if necessary.

2.7.1 Civil Disturbance Procedure

2.7.1 CMI Disturbance Procedure ACTION 1. Report the disturbance immediately to Facility Operator. 2. Notify Facility Supervisor and make other internal notifications, as appropriate. (SECTION 4.0) 3. Notify local law enforcement agencies. (SECTION 4.0) 4. DO NOT attempt physical force to restrain or detain any person(s) other than to protect yourself or other facility personnel. 5. Dispatch facility personnel to secure the facility. 6. Provide local law enforcement personnel with information on facility access and hazards. 7. Conduct post-incident activities. (SECTION 7.0)

2.8.1 Earthquake Procedure

2.8.1 Earthquake Procedure ACTION 1. Activate the emergency alarm if available. 2. Evacuate personnel from the immediate area to the designated assembly area. 3. Account for all personnel. 4. Evaluate the extent of the emergency. 5. If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment. 6. Notify the Facility Supervisor and make other internal notifications, as appropriate. (SECTION 4.0) 7. Conduct an inspection for residual safety hazards, such as: Process safety/integrity Structural damage Downed power lines Leaking natural gas, water and sewer lines 8. Arrange for necessary repairs. 9. Conduct post-incident activities. (SECTION 7.0)

11. Conduct post-incident activities. (SECTION 7.0)

2.8.2 Flooding Procedure

	2.8.2 Flooding Procedure
	ACTION
1. Accou	nt for personnel.
2. Notify	Facility Supervisor and make other internal notifications, as appropriate. (SECTION 4.0)
3. Evalua	te the extent of the emergency.
4. Prepar	re an evacuation plan based upon flood crest and weather forecast.
5. Mainta	in tank levels as appropriate (consider tanks which may float or be filled with water).
6. Secure	e all loose items in the area that could do harm to other equipment (pipe, tools).
7. Engag	e emergency shutdown systems and/or manually isolate processes and equipment, if necessary.
B. Evaçu	ate personnel, as necessary.
9. Condu	ct an inspection for residual safety hazards, such as:
	Structural damage
	Downed power lines Leaking natural gas, water and sewer lines
	Poisonous snakes and other wildlife sheltering in structures, vehicles and furniture
	Avoid direct contact with flood water, mud and animal carcasses

2.8.3 Hurricane Procedure

2.8.3 Hurricane Procedure

ACTION

Prior to Hurricane Season

- 1. Conduct hurricane awareness training, which includes evacuation routes and asset hurricane procedures.
- 2. Coordinate activities with local and state agencies involved in hurricane preparation. (Emergency Access Cards, etc.)
- Identify communications center/rendezvous point for each location, which shall be approximately 100 miles from the affected area. (Examples)

Cipco System - Lufkin, Texas

Patterson Plant - Alexandria, Louisiana

Mobile Bay - Hattiesburg, Mississippi (Montgomery, AL may be a better location for Mobile Bay due to access roads. I-65 @ mile marker 95)

Gulf Plains - San Antonio, Texas

4. Determine disposition of company vehicles during evacuation.

June 1 - Beginning of Hurricane Season

- 1. Verify the availability of and procure emergency supplies:
 - Portable Radios
 - Plywood, lumber, plastic sheeting or covering
 - Drinking water
 - First Aid Kits
 - Flashlight & batteries
 - Tools
 - Emergency non-perishable food item

2.8.4 Tornado Checklist

2.8.4 Tornado Checklist ACTION 1. Activate the emergency alarm, if available, to alert all personnel. 2. Notify and establish communications with the Facility Supervisor. 3. If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment. 4. Initiate evacuation procedures, if necessary (SECTION 2.2), to the designated storm shelter. 5. Account for personnel. 6. Make appropriate internal notifications. (SECTION 4.0) 7. Conduct an inspection for residual safety hazards, such as: Process safety/integrity, as necessary Structural damage Downed power lines Leaking natural gas, water and sewer lines 8. Conduct post-critique activities. (SECTION 7.0)

SECTION 5 INCIDENT RESPONSE ORGANIZATION

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 - Figure 5.12 Staging Area/Security Officer
 - Figure 5.13 Communications Officer
 - Figure 5.14 Finance Officer

5.1 DESCRIPTION OF RESPONSE SYSTEM

The Company's emergency response and resource management approach is based on the concept described below.

- Incidents are routinely handled by local personnel and resources. The Facility Operator is the initial
 Incident Commander (IC) and will assign responsibilities based on personnel availability and operational
 necessity. Once on-site, the Facility Supervisor will assume the role of Incident Commander. This level of
 response will generally require evacuation, personnel accountability and establishment of site security.
- If an incident, because of its magnitude, duration, public interest, or financial exposure exceeds the
 capability of the facility management team, additional Company and outside resources may be activated to
 support response activities. The IC is typically the Facility Supervisor or the next level of supervision.
 Immediate notification will be made up to the Division Operation Vice President. SECTION 5.5 illustrates
 responsibilities of the Incident Commander.
- If the emergency, because of its magnitude, duration, public interest, or financial exposure exceeds the
 capability of the Region/Division management team, Corporate incident support resources will be activated
 to supplement the response effort. These corporate resources may include elements of the Corporate Crisis
 Management Team.

An area's ability to manage an incident is dependent on many factors including the incident's size, complexity, duration and location, as well as government involvement, media attention, financial exposure, and the facility management's own capabilities.

5.2 RESPONSE ACTIVITIES

Emergency response activities are typically summoned in stages. General procedures are illustrated in **FIGURE** 5.1 and described below:

- First Responder discovers the incident and notifies the Facility Operator.
- Facility Operator (IC) notifies the Facility Supervisor. The Facility Supervisor, then assumes role of IC and determines whether additional resources are required.
- IC establishes a Command Post.
- IC summons necessary emergency response personnel, informing Asset, Region and Division Management.
- IC briefs company personnel and emergency responders upon arrival at Command Post.
- · IC continues to assess staffing needs.
- IC summons additional resources, if needed.
- IC releases personnel and resources that are not needed.

An example of a response structure is illustrated in SECTION 5.2.

5.3 INCIDENT COMMAND SYSTEMUNIFIED COMMAND

The Incident Command System integrates responders into the Facility Management Team to effectively coordinate response efforts.

The Unified Command Structure is necessary to integrate local, state, and federal agencies into the facility's emergency response effort. When outside agencies are assisting with the facility response, a representative of that agency must be present in the Command Post to coordinate efforts with the Company Incident Commander.

Local, state, federal, and contract personnel may perform other emergency response functions as appropriate to the size and complexity of the incident.

5.4 CRISIS MANAGEMENT TEAM

For major emergencies the Corporate Crisis Management Team (CMT) may be activated to support Region/Division Management Team response activities. Major incidents require prompt reporting to the Division Senior Vice President. Major incident activation procedures are illustrated in **FIGURE 5.1**. Major incidents are defined as:

- Fatality of an employee or third party on company premises, in a company vehicle, or on company business.
- · Multiple cases of serious injury requiring hospitalization (from the same event).
- A major fire, explosion, acts of nature, vandalism, and theft greater than or equal to \$1,000,000.
- · An incident that requires evacuation of personnel or the public.
- · Any situation expected to attract major media interest.
- Any situation that should be brought to the attention of Corporate Management.

The Division Senior Vice President will activate the Crisis Management Team, as necessary.

FIRST EMERGENCY RESPONDER NOTIFY DETERMINATION OF FACILITY OPERATOR, **COMMAND POST ASSUMES ROLE OF** LOCATION **INITIAL IC NOTIFY FACILITY OR ASSET** MANAGER (OR NEXT LEVEL OF SUPERVISION). DETERMINE WHETHER ADDITIONAL RESPONSE RESOURCES ARE REQUIRED. ASSUME ROLE OF IC, **IF NECESSARY** IC NOTIFIES IC BRIEFS EMERGENCY **NECESSARY PERSONNEL** RESPONSE RESOURCES, TO ASSIST WITH **UPON ARRIVAL AT RESPONSE ACTIVITIES COMMAND POST** AT COMMAND POST IC CONTINUES TO **ASSESS** STAFFING NEEDS **ACTIVATE ADDITIONAL DE-ACTIVATE SUPPORT** PERSONNEL, IF NEEDED PERSONNEL, IF NOT NEEDED (REGION/DIVISION SUPPORT TEAM)

FIGURE 5.1 - INCIDENT ACTIVATION PROCEDURE