Mobil Pipe Line Company

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Mobil Pipe Line Company operates facilities in the following counties of this program area:

SABINE SAN AUGUSTINE

Materials transported are:

DIESEL FUEL [Guide #128]
GASOLINE [Guide #128]
NATURAL GAS LIQUIDS (NGL) [Guide #115]

A fact sheet on the above materials can be found in Appendix 1 of this manual.

ExxonMobil

EMERGENCY PREPAREDNESS AND RESPONSE

The basic concept of the Emergency Response Plan is to minimize the spread of a release or the consequences of an emergency and mitigate its effects. This is best accomplished by securing the source of the release or emergency, containing a spill as close to the source as possible, protecting threatened environmentally sensitive and economically important areas, and removing the spilled material as quickly as possible.

An Emergency Response Plan (ERP) provides guidance on the immediate procedures and notifications which should be followed in an emergency situation, such as a fire, explosion, injury, or release of chemicals, hazardous substances, hazardous wastes, liquefied petroleum gases (LPG), crude oil, refined petroleum products, or gases. These plans also cover other emergencies such as terrorism, abductions, severe weather, tropical storms, tornadoes, hurricanes, dust storms, floods and earthquakes. A plan has been prepared for ExxonMobil Pipeline Company (EMPCo) in response to requirements of the Oil Pollution Act of 1990 (OPA 90) and other emergency planning requirements that are applicable to EMPCo's operations. The focus of a plan is on EMPCo's operations, consisting of pipeline transportation and breakout storage of petroleum and petroleum products. A plan provides quidance for responding to various emergencies and releases or spills of all sizes, including small operational, moderate, and worst case discharges. Special attention has been given to significant waterways and environmental and human use sensitivities which are crossed by, or in close proximity to, the pipeline facilities and which may be affected by petroleum or chemical releases. An ERP has three major objectives:

- To establish safe and consistent methods for responding to, and mitigating impacts of, unplanned releases of hazardous substances, hazardous wastes, crude oil, refined petroleum products, LPG's and chemicals from pipeline operations,
- 2. To comply with applicable U.S. Department of Transportation (DOT), Resource Conservation and Recovery Act (RCRA), Occupational Safety and Health Administration (OSHA), and comparable state rules and regulations governing releases of oil and hazardous materials, and
- 3. To comply with U.S. DOT, OSHA, RCRA, and comparable state regulations requiring written procedures for emergency operations. Rapid activation of the ERP and comprehensive knowledge of its contents are important to the success of response operations. All key personnel involved in emergency planning operations are familiar with the plan. Copies of the ERP will be distributed to key management and response team individuals and will be maintained at selected facilities per DOT regulations (49 CFR 194).

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ExxonMobil Response Organization and Interactions

The ExxonMobil Pipeline Response Team (EMPRT) consists of trained personnel that will respond to all EMPCo emergency incidents. The EMPRT will be supplemented, as required, by ExxonMobil Company's tiered response system consisting of regional ExxonMobil Emergency Local Interfunctional Response Teams (ELIRTs) and the national ExxonMobil North America Regional Response Team (NARRT); descriptions of both teams are included in this section.

The various response teams are activated progressively depending on the size, severity, and circumstances of the spill/release. The EMPRT will generally conduct all response activities for small to medium releases and the initial response for larger releases. Technical and operational assistance from the nearest ELIRT will generally be required for many medium to large spills and support from the NARRT for the largest spills. Each response team's general role and responsibility is as follows:

- ExxonMobil Pipeline Response Team (EMPRT) Composed of employees trained to implement the initial response to all spills/releases. For small incidents, local personnel will generally execute all containment, recovery, and cleanup activities. For larger incidents, the EMPRT may include EMPCo employees from beyond the local geographic area.
- ExxonMobil's Emergency Local Interfunctional Response Team (ELIRT)
 For spills that exceed the response capability of the EMPRT, the appropriate regional ELIRT will be activated and provide additional response capabilities (equipment and personnel support) as necessary. The ELIRT consists of trained personnel from various ExxonMobil functions within the particular geographic region.
- ExxonMobil North America Regional Response Team (NARRT) For high profile and/or significant releases exceeding the capabilities of the combined EMPRT and ELIRT organizations, the NARRT can be activated to provide supplemental response and technical support capabilities. The NARRT may be mobilized in its entirety or in "as-needed" components depending on the situation. The NARRT consists of managers and other specialists from ExxonMobil and affiliates nationwide. It is not expected that any spill from EMPCo's operations will require a response by the NARRT.

TRAINING AND DRILLS

General

The EMPCo response personnel are trained to qualify them for their assigned responsibilities. The ExxonMobil Pipeline Response Team (EMPRT) initial responders periodically review emergency response procedures and their associated role(s) and participate in selected response drills (notification, tabletop, and equipment deployment) conducted by EMPCo in accordance with the National Preparedness for Response Exercise Program (PREP). These team members are responsibilities include spill containment, recovery, protection, and cleanup operations. Some EMPRT team members have attended oil spill training schools and participate in ELIRT and NARRT spill management team drills. All EMPRT members satisfy HAZWOPER training requirements.

HAZWOPER Regulatory Requirements

Initial Certification

Training requirements for emergency response are based on levels of emergency response recognized by the hazardous materials handling industry.

Emergency Response and Post-Emergency Response are distinct operations as defined in OSHA 29 CFR 1910.120 and have distinct training requirements, which are outlined in the EMPCo Training and Education Guide. Below are the levels of Emergency Response Training in which employees may be certified:

- First Responder/Awareness Level, 4 hours: Persons who may witness or discover a release or impending release of a hazardous substance. Responders trained to this level should be able to:
 - Identify a hazardous substance release
 - Initiate an emergency response sequence (evacuate phone call)
 - Notify proper authorities
- First Responder/Operations Level, 8 hours: Persons trained to contain a release from a safe distance.
 - Take defensive action
 - Protect people, property and the environment
 - Prevent exposures and spreading
- Hazardous Materials Technician Level, 24 hours: Persons trained to aggressively mitigate the release and demonstrate competency in a variety of areas including:
 - Stopping the release
 - Take aggressive (offensive) role
 - Approach the point of release to stop it
 - Function in ICS
 - Implement ER Plan
 - Use monitoring equipment
 - Develop a Site Safety and Health Plan
- Hazardous Materials Specialist Level, 24 hours plus specialty:

Persons trained to the level of Hazardous Materials (HAZMAT) Technicians, but designated to provide specific support services versus direct mitigation involvement.

- Implementing the local emergency response plan
- Classify, identify and verify hazardous substances using advanced survey instruments and equipment
- Know applicable state emergency response plan
- Know how to select and use specialized chemical PPE

- On-Scene Incident Commander Level, 24 hours plus Incident Commander Training: Person who takes charge of the incident:
 - Know and be able to implement the employer's ICS
 - Know how to implement the employer's emergency response plan
 - Know and understand the hazards and risks of employees working in chemical protective clothing
 - Know how to implement the local emergency response plan
 - Know of the state emergency response plan and of the Federal Regional Response Team
 - Know and understand the importance of decontamination procedures
- **Skilled Support Personnel:** Heavy equipment operators, tow truck operators, other such persons needed on a temporary basis to perform a specific task require only an on-scene briefing.
- Specialist Employees: Technical experts such as Industrial Hygienists, Safety Personnel, Engineers, Maintenance/Training Experts, Pipeline System Controllers require either training or some form of annual demonstration of competency in their field of specialization.

The point where a response changes from an emergency situation to a post-emergency situation is determined by the State or Federal On-Scene Coordinator or Incident Commander. It is typically associated with the transition from containment, recovery, and protection activities to cleanup and remediation operations. In many cases, however, it is still considered an emergency until cleanup is completed and restoration/remediation operations, if required, are initiated.

Refresher Training Requirements

Refresher training or a demonstration of competency is required annually to maintain qualification at all HAZWOPER levels.

Response Personnel HAZWOPER Training Levels

EMPCo Response Personnel

Team members are required under state and federal regulations to have the proper up-to-date training level to function in their position. All of the initial EMPRT members have at least twenty-four (24) hours of HAZWOPER certification training; whereas, the expanded EMPRT members have anywhere from eight (8) to greater than twenty-four (24) hours of HAZWOPER certification training.

Response Contractors

All contractors responding to an EMPCo spill/release will be required by their contracts with EMPCo to satisfy the HAZWOPER training requirements of 29 CFR 1910.120 for their position.

Other Response Personnel

Skilled Temporary Support Personnel

EMPCo and other response support personnel whose skills are needed temporarily to perform immediate emergency support work (such as truck drivers and crane operators) are not required to meet the training requirements discussed above. However, these personnel must be briefed on the potential hazards and the duties to be performed at the site before participating in response operations. They must also receive instruction in the use of any safety and personal protective equipment needed and be provided with all other appropriate safety and health precautions.

Specialist Employees

Specialist employees are experts who would provide technical advice or guidance during response to a spill incident. Examples of such specialists might include chemists, biologists, industrial hygienists, physicians, or others with skills useful during a spill response operation. Such persons must receive appropriate training or demonstrate competency in their specialty annually. There are no specific requirements on training content or hours of training for these persons except that it entails whatever is necessary to maintain competency in their specific area of expertise. Training and demonstration of competency for skilled support personnel and specialists should be documented.

Casual Laborers

Casual laborers will generally not be hired by EMPCo but may be employed by EMPCo's response contractors or other response organizations. Contractors will be responsible for providing the appropriate HAZWOPER training to these laborers prior to their involvement in response operations.

Volunteers

Volunteers are not utilized by EMPCo in spill response operations. They will generally be referred to the state or federal government agencies who may use them in wildlife rescue and rehabilitation operations. They may also be referred to the response contractors for utilization in non-oil contact operations. In either case, it will be the responsibility of the agencies or contractors to provide the required level of training to the volunteers.

EMPCo Emergency Response Training Program

- Spill response training varies somewhat between EMPRT Initial Responders and Expanded Response personnel.
- EMPCo initial response personnel are trained, both in on-the-job instruction, and at recorded monthly safety meetings and weekly "tailgate" meetings. These meetings include topics such as:

- The operation and maintenance of equipment to prevent and respond to oil discharges, and
- Environmental awareness training including applicable pollution control laws, rules, and regulations.

Records for the above mentioned safety meetings are maintained.

Many EMPRT team members also receive recommended supplemental training in other general topics pertinent to spill response. This training (usually annually) is accomplished by attending EMPCo seminars and training classes, cooperative training classes, external classes, and seminars. Timing of this training will vary based on availability of classes and will not be required for team members to perform their spill team job functions.

A summary of the types of instruction provided includes the following:

- Emergency Response Plan content and use
- Each individual's responsibility as identified in the Emergency Response Plan
- Procedures for 24-hour notification of EMPCo management personnel, qualified individuals and key governmental agencies such as the National Response Center
- Procedures for internal notification of management personnel for various types of spills, accidents, and emergencies
- Characteristics and identification of the hazards associated with the products transported by EMPCo, e.g., HAZCOM and HAZWOPER training including the Emergency Response Guidebook.
- Personal protective equipment.
- Critiques of recent drills and actual spill responses
- Conditions that can worsen emergencies and procedures to minimize potential safety and health hazards and environmental damage
- Firefighting procedures
- Use of air monitoring equipment and respiratory training
- Procedures for spill control, containment, recovery, and cleanup activities

Response Drills

General

Response drills evaluate the effectiveness of the Emergency Response Plan and the preparedness of response personnel. Throughout the year, EMPCo conducts a variety of response drills at both manned and unmanned facilities in compliance with 49 CFR 194, Appendix A, Section 7(b) and the National Preparedness for Response Exercise Program (PREP). EMPCo will endeavor to participate in joint drills whenever possible. EMPCo risk assessment surveys are considered in the development of EMPCo's drill program.

"Qualified Individual" notification exercises, emergency response equipment deployment drills, and spill management team tabletop exercises will be conducted by the EMPRT in the initial response mode for each response zone. The EMPRT in the expanded

response mode will participate in selected response zone tabletop exercises or those conducted by ELIRT or NARRT to satisfy the annual regional Spill Management Team exercise requirements.

EMPCo will utilize Qualified Individual (QI) notification exercises, Spill Management Team "tabletop" simulation exercises, emergency response Equipment Deployment drills and/or combination exercises to ensure that all plan components are appropriately exercised. The fifteen (15) core components of a plan are described in the PREP Guidelines and in a following subsection entitled Response Plan Core Components. During each triennial cycle, all components of EMPCo's response plan will be exercised at least once. EMPCo will identify those components, as described in the PREP Guidelines, that are applicable for a particular drill. Using PREP Guidelines, EMPCo conducts drills for LPG/Chemical systems as well as crude oil and product systems.

Emergency Response Exercise / Drill Program

Qualified Individual (QI) Notification Exercise

Each quarter, EMPCo will conduct an exercise to test QI notification procedures. Personnel receiving this notification will respond to the individual initiating the exercise. Verification of receipt of the notification will be documented. If equipment failure or problems resulted in notification being delayed or prevented, these problems will be identified and corrected prior to the next exercise. One of these notification exercises per year will be done during non-business hours.

ER Equipment Deployment Drills

EMPCo will conduct annual equipment deployment drills of EMPCo owned Emergency Response equipment. During these drills, facility response equipment will be deployed to simulate a local response to a spill/release occurring at EMPCo facilities. Deployment will include strategies in this response plan for protecting adjacent interests and sensitive areas. The EMPRT will deploy a representative amount of response equipment annually including 1,000 feet of containment boom and one (1) of each skimming systems listed in the plan. Records of equipment deployed, personnel involved, and other information regarding the exercise will be documented on the Equipment Deployment Report including Emergency Response Drill Critique and Lessons Learned. Forms will be maintained at EMPCo's Headquarters for a period of at least three (3) years for MMS/RSPA or (5) years for EPA plans.

Annual equipment deployment drills are also required of Oil Spill Removal Organizations (OSRO's) in addition to facility-owned oil spill equipment deployment drills.

Spill Management Team Tabletop Exercises

EMPCo will conduct annually a regional Spill Management Team (SMT) Tabletop Exercise for the EMPRT in the expanded response mode, as indicated in this Plan. EMPCo will also conduct annually one SMT Tabletop Exercise of the EMPRT in the initial response mode for each response zone listed in this Plan. One of the SMT Tabletop Exercises in each zone will involve the zone's worst case discharge scenario during a three (3) year drill cycle.

Unannounced Exercises/Drills

Annually, each Response Zone will ensure that either the SMT or an emergency response Equipment Deployment drill will be conducted <u>unannounced</u>. <u>This is not a separate or additional exercise</u>. An unannounced exercise is where the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill incident.

Exercise/Drill Self-Evaluation

Following the completion of required exercises/drills, EMPCo will conduct a self-evaluation review or critique. The review/critique will evaluate the effectiveness of the core components of the plan and key response activities to determine the lessons learned. Corrective measures or follow-up actions may be derived from the exercise/drill evaluation process.

Regulatory Exercises

EMPCo will participate in agency sponsored/mandated drills as required. These drills may be initiated by the agencies as announced or unannounced. The regulatory agencies will also be invited to participate in the EMPCo Equipment Deployment drills and/or Spill Management Team Tabletop exercises.

Response Plan Core Components

The content of this section is an excerpt from OPA-90's National Preparedness for Response Exercise Program (PREP) Guidelines. It is included in this plan to provide a better understanding of the characteristics exercised as core components. During each triennial cycle, all components of a plan holder's response plan must be exercised at least once. The purpose of this requirement is to ensure that all plan components function adequately for response to an oil spill.

The 15 core components listed below are the types of components that must be exercised. However, all these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

- 1. **Notifications**: Test the notifications procedures
- 2. **Staff Mobilizations**: Demonstrate the ability to assemble the spill response organization
- 3. Ability to Operate Within the Response Management System:
 - a. **Unified Command**: Demonstrate the ability to consolidate the concerns and interests of the other members of the unified command into a unified strategic plan with tactical operations.. Unitied Command members:
 - 1) Federal Representation:
 - 2) State Representation:
 - 3) Local Representation:

- 4) Responsible Party Presentation
- b. **Response Management System**: Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans:
 - 1) <u>Operations:</u> coordinate or direct operations related to the implementation of action plans
 - 2) <u>Planning:</u> consolidate the various concerns of the members of the unified command into joint planning recommendations and specific long-range strategic plans.
 - 3) Logistics: provide necessary equipment and resources.
 - 4) <u>Finance/Administration:</u> document the daily expenditures of the organization and provide cost estimates for continuing operations.
 - 5) <u>Public Affairs:</u> form a joint information center and provide the necessary interface between the unified command and the media.
 - 6) <u>Safety Affairs:</u> monitor all field operations and ensure compliance with safety standards.
 - 7) <u>Legal Affairs:</u> provide the unified command with suitable legal advice and assistance.
- 4. <u>Discharge Control</u>: spill response organization to control and stop the discharge at the source.
- 5. **Assessment**: provide initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations.
- 6. **Containment**: contain the discharge at the source or in various locations for recovery operations.
- 7. **Recovery**: recover the discharged product.
 - a. On-Water Recovery: deploy on-water recovery resources
 - b. Shore-Based Recovery: deploy shore side cleanup resources
- 8. **Protection**: protect the environmentally and economically sensitive areas
 - a. <u>Protective Booming</u>: deploy sufficient resources to implement the protection strategies
 - b. <u>Dispersant Use</u>: quickly evaluate the applicability of dispersant use for this incident and implement the protection strategies
 - c. <u>In-Situ Burning</u>: quickly evaluate the applicability of in-situ burning for this incident and implement a pre-approved plan

- d. <u>Water Intake Protection</u>: identify water intakes and implement the proper protection procedures
- e. <u>Wildlife Recovery and Rehabilitation</u>: resources at risk and implement the proper protection
- f. <u>Population Protection</u>: identify health hazards associated with the discharged product and the population at risk from these hazards, and to implement the proper protection procedures
- g. <u>Bioremediation</u>: quickly evaluate the applicability of bioremediation use for this incident,
- 9. **Disposal**: dispose of the recovered material and contaminated debris.
- 10. **Communications**: establish an effective communications system for the spill response organization.
 - a. <u>Internal Communications</u>: establish an intra-organization communications system. This encompasses communications within the administrative elements of field units.
 - b. <u>External Communications</u>: establish communications both within the administrative elements and the field units.
- 11. <u>Transportation</u>: provide effective multi-mod transportation both for execution of the discharge and support functions.
 - a. Land Transportation:
 - b. Waterborne Transportation:
 - c. Airborne Transportation
- 12. **Personnel Support**: provide the necessary support of all personnel associated with the response.
 - a. <u>Management</u>: provide all administrative management of all personnel involved in the response. This requirement includes the ability to move personnel into or out of the response organization with established procedures.
 - b. <u>Berthing</u>: provide overnight accommodations on a continuing basis for a sustained response.
 - c. <u>Messing</u>: provide suitable feeding arrangements for personnel involved with the management of the response.
 - d. <u>Operational and Administrative Spaces</u>: provide suitable operational and administrative spaces for personnel involved with the management of the response.

- 13. **Equipment Maintenance and Support**: maintain and support all equipment associated with the response.
 - a. Response Equipment: provide effective maintenance and support for all response equipment.
 - b. <u>Support Equipment</u>: provide effective maintenance and support for all equipment that supports the response. This requirement includes communications equipment, transportation equipment, administrative equipment, etc.
- 14. **Procurement**: Demonstrate the ability to establish an effective procurement system to obtain.
 - a. Personnel:
 - b. Response Equipment
 - c. Support Equipment
- 15. **<u>Documentation</u>**: to document all operational and support aspects of the response and provided detailed records of decisions and actions taken.

Hazardous Waste Training

EMPCo field operations personnel receive extensive regulatory-required training in HAZWOPER, HAZCOM, emergency response, fire fighting, and other areas as described in this section and in EMPCo's Training and Education Guide. Employees at sites which generate hazardous waste receive additional orientation and training specific to hazardous waste regulatory requirements, and hazardous waste emergency response. Site emergency coordinators (qualified individuals) also receive additional training on incident command systems.

Hazardous waste management activities are directly overseen in the field by EMPCo's Field Env/Reg/Safety/Training (ERST) Technicians. In addition to the training described above, Field ERST Techs receive initial classroom or on-the-job hazardous waste training and annual hazardous waste refresher training. This training includes the following general elements:

- Hazardous Waste Regulatory Overview And Compliance Assurance
- Hazardous Waste Management Procedures
- Hazardous Waste Emergency Response Procedures, Equipment and Systems

Other employees at a site which hazardous waste may be present, but who are not directly involved in the handling or oversight of that waste, receive general awareness/orientation training on the waste in question from the Field ERST Tech.

Conclusion

At ExxonMobil, safety is a number one priority. The goal is to avoid accidents or incidents, but, if one does occur, an effective emergency response plan is maintained at all times to mitigate the consequences.



PEROLEUM PEROLEUM

BEFORE EXCAVATING OR IN EMERGENCY

CALL COLLECT 214-742-3106

Mobil Pipe Line Company

Dallas, Texas



