# INITIAL RESPONSE ACTION GUIDELINES

**For Emergency Response to BP Pipelines Incident**

| RESPONSE ACTION | Person Taking Action (Initials) | Date/Time Action Taken |
|---|---|---|
| **First Person to Discover Spill** | | |
| 1. IMMEDIATELY NOTIFY TERMINAL SUPERVISOR OR ALTERNATE | | |
| **Primary Response Actions (Incident Commander or Designee)** | | |
| 2. ENSURE PERSONNEL SAFETY –<br>Sound alarm, evacuate if necessary, account for all personnel, explain hazards, require appropriate PPE and secure spill area | | |
| 3. ELIMINATE IGNITION SOURCES –<br>Shut off motors, electrical pumps, electrical power, open flames, etc. in spill area | | |
| 4. QUICKLY ASSESS SPILL AND SAFETY HAZARD –<br>Spill size, rate, type, cause, movements, fire/explosion hazard and health risk | | |
| 5. ACTIVATE PRIMARY RESPONSE TEAM –<br>Utilize onsite personnel to extent possible and supplement with off-duty personnel | | |
| 6. IF SAFE, CONTROL SPILL SOURCE –<br>Shut down pumps, close valves, transfer oil from leaking tank, etc. | | |
| 7. INITIATE FACILITY SPILL CONTROL –<br>Block storm drains and close separator valves (if necessary), construct containment/diversion berms, apply sorbents, etc. | | |
| 8. RE-ASSESS SPILL PARAMETERS AND RESPONSE –<br>Estimate spill volume/rate, cause, type/classification, effectiveness of source/ spill control operations, spill movements, safety/environmental concerns, weather/hydrographic conditions, etc. | | |
| 9. INITIATE OFF-SITE SPILL CONTROL –<br>For spill to river, initiate aquatic spill control and Sensitive Area Protection | | |
| **Notification/Documentation (Incident Commander)** | | |
| 10. NOTIFY APPROPRIATE COMPANY PERSONNEL –<br>Primary Response Team Members, Qualified Individual, Company Management, Area Response Team Call Duty Officer | | |
| 11. NOTIFY/ACTIVATE RESPONSE CONTRACTORS (As required) - | | |
| 12. NOTIFY APPROPRIATE REGULATORY AGENCIES –<br>Federal NRC, State DEM, Regional Ecology office and others, such as LEPC, as necessary | | |
| 13. NOTIFY THREATENED NEARBY PARTIES/SENSITIVE AREA MANAGERS (Uncontained Spills or vapor clouds only) | | |
| 14. NOTIFY/ACTIVATE OTHER RESPONSE CONTRACTORS OR SUPPORT SERVICES (As required) | | |
| 15. INITIATE DOCUMENTATION PROCEDURES –<br>Document all response actions taken previously and all subsequent response actions including notifications, agency/media meetings, equipment/personnel deployments, recovery and disposal of oil and oily waste, extent and degree of area impacted, etc. | | |
| 16. ESTABLISH COMMAND POST/COMMUNICATIONS CENTER | | |
| 17. INITIATE SPILL TRACKING AND SURVEILLANCE OPERATIONS –<br>Helicopters, fixed-wing aircraft, vehicle (if safe) | | |
| 18. IDENTIFY THREATENED SENSITIVE AREAS AND PRIORITIZE –<br>Parks, wildlife/fish habitats, marinas, etc. | | |

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| 19. DEVELOP OVERALL RESPONSE OBJECTIVE AND INCIDENT ACTION PLAN –<br>Maximize utilization of available equipment, personnel and logistics to limit the area affected by the spill and the associated impacts. Prioritize actions. Plan for the effective utilization of additional equipment and supplies as they arrive | | |
| 20. IDENTIFY EQUIPMENT, PERSONNEL and LOGISTICAL SUPPORT REQUIREMENTS FOR SECONDARY SPILL RESPONSE OPERATIONS –<br>Containment, protection, recovery and cleanup | | |
| 21. IMPLEMENT APPROVED INCIDENT ACTION PLAN –<br>In order of priority | | |
| 22. ESTIMATE WASTE HANDLING AND INTERIM STORAGE REQUIREMENTS –<br>Based on quantity spilled, recovery capacity, areas affected, degree of impact, etc. | | |
| 23. ARRANGE FOR INTERIM SOLID AND LIQUID WASTE HANDLING AND STORAGE –<br>Pumps, barges, portable tanks, available tankage at facility, debris boxes, lined storage cells, heavy equipment, permits, etc. | | |
| 24. INITIATE LOGISTICAL SUPPORT FOR RESPONSE OPERATIONS –<br>Transportation, lodging, meals, supplies, portable toilets, communications equipment, additional office space, etc. | | |
| 25. ARRANGE FOR TRANSPORTATION, TREATMENT and/or DISPOSAL OF RECOVERED OIL AND OILY WASTES –<br>Determine characterization, packaging and transportation requirements for the candidate treatment/disposal facilities | | |
| 26. COMPLETE CLEANUP OPERATIONS AND OBTAIN CLEARANCE FROM REGULATORY AGENCIES –<br>Obtain written agency clearance for each section of shoreline as cleanup is completed | | |

Additional Information available per request:

- Airborne Contaminants Levels and Action Plans: Guidelines for Hydrocarbon Release Sites
- Safety Data Sheets

**Airborne Contaminants Action Levels and Action Plans:**
**Guidelines for Hydrocarbon Release Sites**

| LOCATION | CONTAMINANT | ACTION LEVELS* (sustained) | ACTION PLAN |
|---|---|---|---|
| Hot Zone (Exclusion Zone) | LEL % | > 10 % | IDLH - Evacuate to Warm Zone and re-assess condition/situation. |
| | | 1 -10 % | Conditional Work. Continuously monitor LEL. Also measure Benzene & VOCs. Expand Zone perimeter as needed. |
| | | < 1 % | Safe to Work. Continuously monitor. |
| | O2 | < 19.5, > 23.5 % | Evacuate to Warm Zone and re-assess condition/situation. |
| | | 19.5 - 23.5 % | Safe to Work |
| | Carbon Monoxide | > 1200 ppm | IDLH - Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 35 ppm | 35 - 1200 ppm | Conditional Work.Supplied Air Respiratory Protection required. Expand Zone perimeter as needed. |
| | | < 35 ppm | Safe to Work |
| | H2S | > 100 ppm | IDLH - Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 10 ppm, Ceiling = 20 | 10 - 100 ppm | Conditional Work. Supplied Air Respiratory Protection required. Continuously monitor. Expand Zone perimeter as needed. |
| | | < 10 ppm | Safe to Work. Continuously monitor if H2S suspected. |
| | Benzene | > 500 ppm | IDLH - Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 1ppm STEL = 5 ppm | 50 - 500 ppm | Conditional Work. Implement Engineering and Work Practice Controls. Supplied Air Respiratory Protection required. Quantitative Fit Test Required. Continue to monitor. Expand Zone perimeter as needed. |
| | | 10- 50 ppm | Conditional Work. Full Face Air Purifying Respirator w/ OV cartridges required. Quantitative Fit Test Required.Continue to monitor. Expand Zone perimeter as needed. |
| | | 1 -10 ppm | Conditional Work. Half Mask Air Purifying Respirator w/ OV cartridges required. Continue to monitor. Expand Zone perimeter as needed. |
| | | < 1 ppm | Safe to Work. |
| | VOC / Total Petroleum Hydrocarbons as Gasoline | > 10% LEL | Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 300 ppm, STEL = 500 ppm | 300 ppm - 10 %LEL | Conditional Work. Half Mask Air Purifying Respirator Protection w/ OV cartridges Required. Continue to monitor. Expand Zone perimeter as needed. |
| | | < 300 ppm | Safe to Work. |
| | VOC / Total Petroleum Hydrocarbons as Diesel -ULS | > 10% LEL | Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 30 ppm, STEL = 500 ppm | 30 ppm - 10 %LEL | Conditional Work. Half Mask Air Purifying Respirator Protection w/ OV cartridges Required. Continue to monitor. Expand Zone perimeter as needed. |
| | | < 30 ppm | Safe to Work. |
| | Xylene | > 900 ppm | IDLH - Evacuate to Warm Zone and re-assess condition/situation. |
| | TWA = 100 ppm, STEL = 150 ppm | 150 - 900 ppm | Conditional Work. Full Face Air Purifying Respirator w/ OV cartridges required. Continue to monitor. Expand Zone perimeter as needed. |
| | | 100 - 150 ppm | Conditional Work. Half Mask Air Purifying Respirator w/ OV cartridges required. Continue to monitor. Expand Zone perimeter as needed. |
| | | < 100 ppm | Safe to Work. |
| | Ethanol | > 10% LEL | Evacuate to Warm Zone and re-assess condition/situation. |
| | STEL = 1000 ppm | 1000 ppm - 10 %LEL | Conditional Work. Air Purifying Respiratory Protection w/ OV cartridges required. Continue to monitor. Expand Zone perimeter as needed. |
| | | < 1000 ppm | Safe to Work. |

* Level values are based on 8-hr TWA occupational exposure potentials and may need to be adjusted if work shift is greater than 8 hours.

**Airborne Contaminants Action Levels and Action Plans:**
**Guidelines for Hydrocarbon Release Sites**

| LOCATION | CONTAMINANT | ACTION LEVELS* (sustained) | ACTION PLAN |
|---|---|---|---|
| Warm Zone (Isolation Zone) | LEL % | > 10 % | Evacuate to Cold Zone and re-assess condition/situation. |
| | | 1 -10 % | Conditional Work. Continuously monitor LEL. Also measure benzene & VOCs. Modify Zone perimeters. |
| | | < 1% | Safe to Work |
| | O2 | < 19.5, > 23.5 % | Evacuate to Cold Zone and re-assess condition/situation. |
| | Carbon Monoxide | > 35 ppm | Evacuate to Cold Zone and re-assess condition/situation. |
| | H2S | > 10 ppm | Evacuate to Cold Zone and re-assess condition/situation. |
| | | 1 - 10 ppm | Conditional Work. Continuously monitor H2S levels. Modify Zone perimeters. |
| | | < 1 ppm | Safe to Work |
| | Benzene | > 1 ppm | Evacuate to Cold Zone and re-assess condition/situation. Modify Zone perimeters. Continue to monitor. |
| | | 0 -1 ppm | Safe to Work |
| | VOC / Total Petroleum Hydrocarbons as Gasoline | > 300 ppm | Evacuate to Cold Zone and re-assess condition/situation. Modify Zone perimeters. Continue to monitor. |
| | | 100 - 300 ppm | Safe to Work. Continue to Monitor. Assess/Modify Zone perimeters. |
| | VOC / Total Petroleum Hydrocarbons as Diesel -ULS | > 30 ppm | Evacuate to Cold Zone and re-assess condition/situation. Modify Zone perimeters. Continue to monitor. |
| | | 10 - 30 ppm | Safe to Work. Continue to Monitor. Assess/Modify Zone perimeters. |
| | Xylene | > 100 ppm | Evacuate to Cold Zone and re-assess condition/situation. Modify Zone perimeters. Continue to monitor. |
| | | 10 -100 ppm | Safe to Work. Continue to Monitor. Assess/Modify Zone perimeters. |
| | Ethanol | > 1000 ppm | Evacuate to Cold Zone and re-assess condition/situation. Modify Zone perimeters. Continue to monitor. |
| | | 100 -1000 ppm | Safe to Work. Continue to Monitor. Assess/Modify Zone perimeters. |

* Action Level values are based on 8-hr TWA occupational exposure potentials and my need to be adjusted if work shift exposures are greater than 8 hours.