



ENERGY TRANSFER

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May 20, 2016

Mr. R.M. Seeley  
Director, Southwest Region  
Pipeline Hazardous Materials Safety Administration (PHMSA) Office of Pipeline Safety  
8701 South Gessner, Suite 630  
Houston, TX, 77074

RE: CPF No. 4-2016-5017M  
Energy Transfer Company - Notice of Amendment

Dear Mr. Seeley,

Energy Transfer Company acknowledges receipt of the PHMSA Notice of Amendment dated May 2, 2016.

Regarding the proposed revisions mentioned as Items 1-4, related to Energy Transfer HLA.08 Field Emergency Response Procedure, Section 7.4, we have added additional language to the procedure based on the Notice of Amendment.

Enclosed are the revised procedure HLA.08, with the added language highlighted and the referenced Safety Procedure S-50 Combustible Gas Indicators/Toxic Atmosphere Monitoring. These changes have been submitted through our Procedures MOC process, with a planned published effective date of 08/01/16.

Sincerely,

Danny Nichols  
Director – Interstate/Intrastate Regulatory Compliance  
Energy Transfer Company



**ENERGY TRANSFER**

***Field Emergency Response Procedures***

***Standard Operating Procedures***

*Applicable to Hazardous Liquids Pipelines and Related Facilities*

<b>Code Reference:</b> 49 CFR: 195.408	<b>Procedure No.: HLA.08</b> 08/01/16	<b>Page 1 of 21</b>
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**1.0 Procedure Description** This Standard Operating Procedure (SOP) provides instruction and guidance to field employees when preparing for and responding to an emergency event. All employees subject to involvement in an emergency response will be trained on the information and procedures contained herein.

**2.0 Scope** This SOP establishes pre-planned response activities to be used in the event of a facility incident, failure or other emergency. The response activities included in this procedure align with those required by regulation. These procedures apply to all regulated pipeline facilities. An effective response to an emergency should accomplish the following:

- Provide for incoming notification, confirmation and classification of the emergency situation
- Provide for the contact and mobilization of company and third party resources required to respond to the emergency and/or restoration activities
- Provide for emergency shutdown, pressure reduction and/or isolation as applicable to the scenario and as needed to make the conditions safe
- Establish and maintain communications with company personnel and local emergency responders, law enforcement and public officials
- Provide for coordination and resource planning with local emergency responders
- Provide for the safety of the public and company personnel above all other considerations
- Provide for the protection of public and company property to the extent possible
- Monitor the released HVLs and take actions to minimize the impact including possible intentional ignition when necessary.
- Provide preparedness and response procedures for typical emergency scenarios
- Provide for safe restoration of facilities and services
- Provide for investigation of failures
- Provide for training and review of emergency response activities
- Provide for continued liaison activities with emergency responders, local law enforcement, and public officials

The procedures in this SOP either directly or by reference accomplish the above objectives.

**3.0 Applicability** This SOP applies to all regulated pipeline facilities and related employees that are required to respond to an emergency.

**4.0 Frequency** As needed: Response Activities  
Annually: Training

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**5.0  
 Governance**

The following table describes the responsibility, accountability, and authority for the activities described in this SOP.

<b>Function</b>	<b>Responsibility</b>	<b>Accountability</b>	<b>Authority</b>
Area Emergency Response Plan Development	Operations Personnel	Operations Manager	Director of Operations
Initial Notification of Emergency	Liquid Control / Operations Personnel	Operations Manager	Director of Operations
Confirmation and Classification of the Emergency	Operations Personnel	Operations Manager	Director of Operations
Responding to and Notification of Emergencies	Operations Personnel	Operations Manager	Director of Operations
Security	Operations Personnel	Operations Manager	Director of Operations
Media Response	Operations Manager / Media Relations	Operations Manager	Sr. VP of Operations or Designee
Post Emergency Response Operations	Operations Personnel	Operations Manager	Director of Operations
Emergency Response Review	Operations Personnel	Operations Manager	Director of Operations
Training	Operations Personnel	Operations Manager	Director of Operations
Liaison with Community Response Agencies and Utilities	Operations Personnel	Operations Manager	Director of Operations

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**6.0  
Terms and  
Definitions**

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

<b>Terms</b>	<b>Definitions</b>
Emergency	<p>Any situation demanding immediate corrective action, which may involve company facilities or operations, endangerment of human life, company and public property damage and which may affect normal service to customers.</p> <p>Emergencies may result from numerous events, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Leaking liquids near or involving a pipeline or pipeline facility</li> <li>• Fire located near or directly involving a pipeline or pipeline facility</li> <li>• An explosion near or directly involving a pipeline or pipeline facility</li> <li>• Substantial service interruptions to a pipeline or pipeline facility</li> <li>• Release or spill of a hazardous substance causing, or likely to cause, an environmental impact</li> <li>• Potential pipeline events such as those listed above due to natural disasters such as: <ul style="list-style-type: none"> <li>○ Wind storms</li> <li>○ Hail</li> <li>○ Flooding</li> <li>○ Tornado</li> <li>○ Hurricane</li> <li>○ Wildfire</li> <li>○ Earth movement (landslides, earthquake, subsidence, etc.)</li> </ul> </li> <li>• Civil disturbances or other acts affecting physical security that could disrupt operations (such as vandalism, arson, bomb threats, kidnapping, biological threats, public confrontations or riots)</li> <li>• Any unusual situation whereby human life or significant property is endangered</li> </ul>
Incident	Reference to <i>SOP HLA.15 PHMSA – States - Incident Reporting</i> for definition and classification of incidents
IAP	Incident Action Plan
ICS	Incident Command System
PED	Personal Electronic Device includes cell phones, ipods, MP3 Players, pagers, cameras, etc.
PERO	Post Emergency Response Operation
PPE	Personal Protection Equipment
OCC	Operation Communication Center

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**CAUTION:** The use of Personal Electronic Devices (PEDs) by pipeline employees who are performing operations & maintenance activities may increase safety risks by becoming distracted. Such distractions may also hinder prompt recognition and reaction to abnormal operating conditions and emergencies.

While the Company is not discouraging the use of PED's as a part of normal business communications, it recognizes the increased risks associated with the use of PED's by individuals performing activities that affect pipeline operation or integrity. Pipeline operations & maintenance tasks require a critical level of attention and skill, which may be compromised by visual, manual and cognitive distractions caused by the use of PED's.

The use of PEDs is discouraged while working in or around a hazardous atmosphere. Most PEDs are not intrinsically safe and could potentially be an ignition source.

**7.0  
Field  
Emergency  
Response  
Procedures**

This procedure contains the following sections:

- Area emergency response plan
- Initial notification of emergency
- Confirmation and classification of the emergency
- Responding to and notification of emergencies
- Controlling released vapors
- Security
- Media response
- Post emergency response operation
- Emergency response review
- Training
- Liaison with community response agencies and utilities

**7.1  
Area  
Emergency  
Response Plan**

Develop an Area Emergency Response Plan (Plan) in accordance with *SOP HLA.19 Area Emergency Response Plan Development and Maintenance*. This plan will supplement the procedures provided herein and provide detailed information relative to the Area including company and external contact information, resource-planning information, and Area specific procedures as may be required. The Plan and updates to the Plan shall be provided to all Operations Managers, Directors of Operations and other designated employees responsible for carrying out emergency response activities.

**7.2  
Initial  
Notification of  
Emergency**

Perform the following activities during the initial notification of a system emergency. These activities will be performed by whoever receives the initial notification, which typically would include an Operations Personnel, and /or Liquid Control Personnel.

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**NOTE:**

The Company's means of communication may not be limited by a single source during emergency situations. Communication may be accomplished through a radio system, landline telephone system, continuous cellular communication which is maintained in emergency situations by utilization of a Government Emergency Telecommunications Service (GETS), Wireless Priority Service (WPS) and through the use of satellite phones.

Step	Activity
1	The initial notification of a system emergency can originate from many sources including but not limited to adjacent landowners, the general public, public officials, emergency responders, local law enforcement, Liquid Control, and company employees. <b>UTILIZE</b> the applicable form(s) for <i>Incident Report Log</i> and <b>COLLECT</b> information regarding the caller and the emergency as available at the time of the call.
2	In the event that Liquid Control <b>DETECTS</b> the initial discovery of an emergency via the SCADA system, Liquid Control will make the initial notification to field personnel and <b>INITIATE</b> the emergency response. In this case, field personnel should <b>RECORD</b> notification information on the applicable form(s) for <i>Incident Report Log</i> and <b>PROCEED</b> to Section 7.3 below.
3	If appropriate, <b>ADVISE</b> the caller with the following applicable information: <ul style="list-style-type: none"> <li>• Company employees have been or will be dispatched to the location as soon as possible.</li> <li>• Remain clear of the area of the emergency and to the extent possible, do not allow anyone other than company representatives or emergency responders to enter the area.</li> <li>• Do not attempt to shut off any valves or extinguish any fires.</li> <li>• Leave vehicles or equipment in the area of a natural gas emergency as is and do not attempt to move them or turn off ignitions.</li> <li>• Request a call back should there be any significant changes in the situation.</li> </ul>
4	<b>NOTIFY</b> the Public Safety Access Point PSAP(s), commonly referred to as 9-1-1 emergency call centers, or the local equivalent, of indications of a pipeline facility emergency.  Pipeline facility operators should ensure the call to the appropriate PSAP is made promptly, and to as many jurisdictions as is necessary. A direct-inbound ten digit number must be used for the specific PSAP, since a call to 9-1-1 would be routed only to the PSAP for the caller's location.
5	<b>INFORM</b> subsequent callers reporting the same emergency event that the company is aware of the emergency and is taking steps to respond. <b>RECORD</b> any additional information provided by subsequent callers on the applicable form(s) for <i>Incident Report Log</i> .
6	<b>IDENTIFY</b> whether or not there has been an <b>Incident Commander</b> and General Staff members appointed and how to contact them.

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**NOTE:** Acquire the following additional information to the extent possible or applicable when receiving notifications pertaining to emergencies or other abnormal situations.

- The name of the facility if known
- The number and size of pipelines or type of facility involved
- The current operating pressures and operating pressure ranges (MOP)
- The nature of the event, such as:
  - Fire
  - Flammable liquid or gas escaping with or without a fire
  - Toxic or hazardous vapor cloud release
  - Trench collapse
  - Suspicious package
  - The immediate threat to public safety
  - The occurrence of injuries or fatalities

**7.2.1  
Plan Activation**

To accomplish the above objectives, this plan incorporates a tiered response strategy comprised of the following:

- Notification of company management that an emergency event has occurred
- The Everbridge MATRIX program generates a burst call-out of company executives and/or activation of the Emergency Operation Center (EOC)
- The dispatch of a Rapid Response Team to evaluate resource needs and verify appropriate response activities within the first 12 hours
- If necessary, the dispatch of an emergency response organization composed of various support resources to effectively manage the event

The plan is activated by the Emergency Management Team Director for events that:

- Exceed the limits of local response capability
- Threaten impact to employee or public safety, sensitive environmental resources or significant economic areas
- Require regulatory notification and/or response from the Pipeline and Hazardous Materials Safety Administration (PHMSA), Environmental Protection Agency (EPA), Federal Energy Regulatory Commission (FERC) or other agencies
- Require activation of regional or national oil spill response organizations

**7.3  
Confirmation  
and  
Classification of  
the Emergency**

Following the initial notification of a system emergency, the emergency will be confirmed and classified so that appropriate response measures are taken. This process will be dependent on the nature of the emergency, who receives the initial notification, and what additional information or data is possessed at the time of the notification.

Step	Activity
1	<p><b>CONFIRM</b> the initial report of a system emergency to the extent possible using the following means:</p> <ul style="list-style-type: none"> <li>• Operations Personnel – <b>ANALYZE</b> locally available operating data</li> </ul>

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Step	Activity
	and <b>DISPATCH</b> personnel as required to confirm by visual inspection the location and extent of the emergency. <ul style="list-style-type: none"> <li>Liquid Control - <b>ANALYZE</b> SCADA operating data and <b>DISPATCH</b> field personnel as required to confirm by visual inspection the location and extent of the emergency.</li> </ul>
2	Upon confirmation and/or in parallel with confirmation efforts, <b>REPORT</b> the confirmed emergency to the organization's management.
3	<b>UTILIZE</b> the criteria in <i>SOP HLA.04 Initial Reporting and Investigating Events</i> <b>CLASSIFY</b> the emergency.
4	<b>REPORT</b> the emergency in accordance with, <i>SOP HLA.04 Initial Reporting and Investigating Events</i> and, if applicable, <i>SOP HLA.12 Safety Related Condition Reporting</i> .

**7.4  
Responding to  
and  
Notification of  
Emergencies**

The following procedures provide general first response activities upon the report of an emergency. During the emergency phase of the response, the primary objective is to protect life. Secondary to this objective is to secure or make safe the pipeline system and eliminate the source of gas or other hazardous material. The response protocol is based on the Eight Step Process<sup>®</sup> contained in the National Incident Management System, and more specifically the Incident Command System. Most emergency responders are trained in the ICS and therefore will expect a company response that follows the Eight Step Process<sup>®</sup>. These basic steps will guide employees sufficiently for handling any emergency:

1. Site Management and Control
2. Identify the Problem
3. Hazard and Risk Evaluation
4. Select Personal Protective Clothing and Equipment
5. Information Management and Resource Coordination
6. Implement Response Objectives
7. Decontamination and Clean-up Operations
8. Terminate the Incident



**WARNING:** All response actions should be directed toward protecting people first and then property. Consider the activation of emergency shutdown systems or pressure reduction of a facility segment to minimize the hazards to life and property.

Step	Activity
1	<b>DETERMINE</b> the resources required to response to the emergency and <b>MOBILIZE</b> company and third party resources to the site. <b>CONSIDER</b> steps 1 through 6 above when determining resource requirements. <b>DETERMINE</b> the necessity to expand the company's response effort in accordance with the Incident Command System and <b>ACTIVATE</b> those resources as needed.
2	<b>NOTIFY</b> the appropriate local emergency response and law enforcement agencies as applicable for the emergency. <b>PROVIDE</b> information pertaining

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Step	Activity
	to the emergency acquired in <i>Sections 7.2 and 7.3</i> above.
3	<b>ESTABLISH</b> and maintain a perimeter around the location of the emergency that provides for sufficient space for conduct of all subsequent response operations in a safe and efficient manner. <b>RESTRICT</b> access to the immediate area allowing ingress only to authorized personnel and local emergency responders.



**NOTE:** Local law enforcement authorities can provide assistance to enforce this requirement.

Step	Activity
4	<b>IDENTIFY</b> the scope and nature of the problem including recognition and verification of all hazardous materials involved, the type of facilities involved and any collateral exposures.



**NOTE:** The following information should be obtained in order to enable the hazard and risk assessment activity.

1. The number and size of pipelines or type of facility involved
2. The current operating pressures and operating pressure ranges
3. The nature of the event, such as:
  - Fire
  - Flammable liquid or gas escaping with or without a fire
  - Toxic or hazardous vapor cloud release
  - Trench collapse
  - Suspicious package
4. Hazardous product(s) involved and unique safety hazards or considerations associated with the incident. Consider such constituents as:
  - Highly Volatile Liquids
  - Refined Petroleum Products
  - Crude Oil
  - H<sub>2</sub>S
  - FeS
  - Other
  - Physical characteristics, such as whether or not the product contains H<sub>2</sub>S concentrations greater than 100 parts per million
5. Dependent on product and consultation with local Emergency Responders to establish a site-specific emergency plan based on the Emergency Response Guidebook. Use appropriate industry approved hydrocarbon detection devices to determine the extent and coverage of the vapor cloud / hazardous area (i.e. Three Sensor - O<sub>2</sub>/LEL/Toxic vapor analyzer or combustible gas indicators) (See Appendix C for Safe Approach to Potentially Hazardous Areas) and Safety Procedures S-50 and S-370.
6. The components isolated from sources of hazardous liquids, when the isolation occurred or will be completed.

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7. Personal injuries/fatalities/missing persons:
  - The number of fatalities and location
  - The number of missing persons and last known location
  - The number of people treated for injuries at the scene or transported to a medical center for treatment and the location to which the injured person(s) was transported
8. The type of injuries sustained
9. Type and extent of property damage involved:
  - Pipeline
  - Pipeline facilities
  - Other company property
  - Non-company property
  - Collateral property
10. Risk exposures in close proximity to the incident:
  - Residences
  - Schools or restaurants
  - Places where the public might congregate
  - Flammable materials storage
  - Other pipelines or utilities such as electrical substations
11. Current and expected weather conditions
  - Liquids releases into waterways must consider temperature, wind and wave directions and velocity, and tides.
12. Flammable gas releases, which do not ignite, could be affected by humidity and wind direction.

Step	Activity
5	<b>ASSESS</b> the hazards present, <b>EVALUATE</b> the level of risk and <b>ESTABLISH</b> an Incident Action Plan (IAP) designed to mitigate the problem. If appropriate, <b>UTILIZE</b> the pre-planned emergency procedures contained in Appendix B and/or specific procedures contained in the Area Emergency Response Plan. These procedures comprise the initial Incident Action Plan.
6	<b>DETERMINE</b> the appropriate PPE required for personnel involved in the response activity and <b>PROVIDE</b> as needed.
7	<b>PROVIDE</b> information to local emergency responders relative to the emergency and the company's emergency response procedures. Jointly <b>DETERMINE</b> each responder's actions associated with the IAP and continue to communicate and coordinate assigned IAP tasks with local emergency responders. <b>ESTABLISH</b> who will be the on-site Incident Commander and/or Operations Officer as applicable and <b>OBTAIN</b> contact information.



**NOTE:** Actual employee and company involvement and assignment of ICS officer in any particular emergency is heavily dependent on the nature of the emergency. It is also dependent on the location of the emergency, involvement of public safety officials, and numerous other factors.

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Step	Activity
8	<b>IMPLEMENT</b> the IAP and ensure that the incident response priorities are accomplished in a safe, timely and effective manner.
9	If appropriate for the emergency at hand, <b>ESTABLISH</b> intervals for subsequent coordination meetings. <b>RECONVENE</b> meetings of the responding agents to <b>DISCUSS</b> progress made, IAP revisions as needed and transition to the next step.



**NOTE:** The meeting interval should not exceed one to one and a half hours.

Step	Activity
10	<b>CONFIRM</b> completion of the IAP relative to emergency phase of the response and <b>EVALUATE</b> any remaining or new hazards or risks. <b>REVISE</b> the IAP as needed to address these hazards or risks and implement.
11	<b>EVALUATE</b> the need to decontaminate personnel, PPE, and equipment involved in the response and the facilities and/or site of the incident. <b>DEVELOP</b> and <b>IMPLEMENT</b> a cleanup plan that verifies the safety of company personnel, emergency responders and the public by reducing the level of contamination on scene and minimizing the potential for secondary contamination beyond the incident scene.
12	<b>TERMINATE</b> the emergency phase of the response upon completion of all IAP tasks and decontamination/clean-up activities.
13	<b>INITIATE</b> post-emergency response operations (PERO) as required and <b>TRANSFER</b> command of the incident to the appropriate authority.



**WARNING:** As soon as a pipeline emergency has been determined, the Area Director of Operations or designee shall establish communications with appropriate local officials and/or emergency response personnel specifically identified in the Emergency Contact Telephone List contained in the field manual to apprise them of the matter and potential effects on the public. Utilize the list of particular events in Appendix B as a guide for types of events to be reported.

**7.5  
Controlling  
Released  
Vapors**

To control the release of hazardous vapors, the affected section of the system may need to be isolated by shutting in pumps and closing block valves in the area of the leak. The downstream pump may be used to pull the liquid from the affected area until the liquid no longer flows through the pump, and then the downstream block valve must be closed. After the leak is isolated, the vapors may be flared down. If the location of the leak cannot be determined, consider shutting the system down. Stopping should be considered to minimize the quantity released.

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**7.6  
Security**

The aspect of security during emergency response activities can evolve in several different ways, depending on the magnitude of the situation and of the makeup of the local emergency response agencies.



**NOTE:** As part of the nationally recognized Incident Command System, promulgated by the Department of Homeland Security, the first step of the “Eight Step Process” of the Incident Action Plan is to manage and secure the physical layout of the incident to permit the responders not to have to worry about any people other than themselves. This translates into the possibility that company forces may have difficulty gaining access to the site or to nearby facilities to perform their duties. (Roadblocks will be set up, for example.)

Step	Activity
1	<b>BE AWARE</b> of local or federal law enforcement’s responsibilities securing physical layout of an incident site and <b>BE PREPARED</b> to work with the system that is in place at the incident site in order to manage ingress and egress for those needing to access the site. This may involve displaying company issued identification cards, creating lists of people approved to be in the area, issuing unique ID cards for that incident, or some other means of permitting law enforcement agents to determine easily that access should be permitted.
2	The company may <b>ASSIGN</b> or even temporarily <b>EMPLOY</b> someone to manage security full time during the course of the incident. <b>REVIEW</b> this possibility during the liaison meetings between field personnel and local law enforcement agencies and other emergency response units.
3	<b>IDENTIFY</b> and <b>MARK</b> or <b>FLAG</b> the location of parts and pieces of equipment that have been dislodged from their normal location without disturbing them.



**NOTE:** Another aspect of security at incident sites concerns preservation of evidence. To aid in the follow-up investigation and determination of the root cause, once the situation has been brought under control and it is safe to enter the site, field employees need to understand the importance of identifying and marking or flagging the location of parts and pieces of equipment that have been dislodged from their normal location without disturbing them. If practical, leave failed equipment or portions of failed facilities undisturbed until the investigation has gathered all necessary information. If the site cannot be left undisturbed, thoroughly document the site before disturbing it. Documentation will include such things as photographs, dimensioned sketches, corrosion surveys, and collecting soil or liquid samples, as applicable.

**7.7  
Media  
Response**

Reporters and other media individuals have a legitimate right and even an obligation to the public to obtain correct information about emergency events.

It is the company’s desire to address media inquiries with correct information. In order to do so, the person appointed to fulfill the role of Public Information Officer (PIO)

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assumes the responsibility of relating information to media representatives at the scene of an incident, after having obtained review and approval of the information by the Incident Commander, and possibly the Legal Department.

Step	Activity
1	<b>REFER</b> all inquiries to the Public Information Officer, who has adequate knowledge about the particular emergency, unless the information is necessary to help save lives and/or prevent additional injuries. Whenever possible, it is important that the person appointed Public Information Officer has had some training regarding contacts with the media and the Incident Command System.



<b>CAUTION:</b> Employees are to be cautious of persons representing themselves as emergency responders who, in fact, may be media members.
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Step	Activity
2	<p><b>RELEASE</b> only facts related to the emergency, as they are determined, as indicated by the chart below. <b>DO NOT SPECULATE</b> about any aspect of the event.</p> <ul style="list-style-type: none"> <li>• What can be released: <ul style="list-style-type: none"> <li>○ What happened and when</li> <li>○ The number of known injuries and/or missing persons</li> <li>○ What the company is doing or has done to end the emergency</li> <li>○ That the company is investigating or will investigate the cause of the emergency</li> <li>○ That no further information is available but additional information will be released as soon as possible</li> </ul> </li> <li>• What cannot be released: <ul style="list-style-type: none"> <li>○ What you think happened and when you think it started</li> <li>○ The names of injured or missing persons and the extent of their injuries</li> <li>○ That the company is at fault and accepts blame for the incident</li> <li>○ What you think the cause is or was, unless it is plainly obvious such as storm, vehicles left on the scene, etc.</li> <li>○ Information pertaining to the frequency of such incidents on other company facilities or the industry in general</li> </ul> </li> </ul>
3	<p><b>REFER</b> media telephone calls to the Public Information Officer who has been briefed of the facts of the situation.</p> <p>Vicki Granado                      Office 214.599.8785                      Cell 214.498.9272 Brent Ratliff                      Office 214.981.0766                      Cell 214.802.0377</p>
4	<b>ADVISE</b> the caller that the company's Public Information Officer will be the best company contact for any further information.

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**NOTE:** Personnel that could be reasonably expected to communicate directly with the media will receive applicable media training on an as-needed basis and as determined by Operations Management

**7.8  
Post  
Emergency  
Response  
Operations**

Following completion of the emergency phase of the response, transition is made to post emergency response operations. This transition may include transfer of the Incident Command to or from company personnel; to different company personnel or to a different outside agency as applicable. In addition, depending on the nature and significance of the incident, the Corporate Emergency Management Team Lead may dispatch the Rapid Response Team to assist field personnel with management of the post emergency response operations. Reference: Emergency Response Management Plans

**7.8.1  
Investigation of  
Failures**

Perform investigations in accordance with *SOP HLA.11 Investigation of Failures* as appropriate.



**NOTE:** In the event that fatalities or injuries resulted from the emergency incident, other outside agencies may be involved in this activity and may assume a lead role in the investigation.

**7.8.2  
Restoration of  
Service**

Restore service as quickly as practical following isolation, control and repair of any emergency that interrupts service. Be aware that *Section 7.7.1* above may affect access to the incident site and subsequently delay or hamper restoration activities. General procedures for responding to any service outage are as follows.

Step	Activity
1	<b>CONTACT</b> the Area Office or Liquid Control with the following information: <ul style="list-style-type: none"> <li>• A description of the situation</li> <li>• The location of the service outage and your relative location</li> <li>• An assessment of whether company personnel can handle the situation</li> <li>• A request for what assistance is needed</li> </ul>
2	<b>DISPATCH</b> the required personnel to complete any required repairs.
3	<b>NOTIFY</b> any affected companies or customers.
4	<b>CONSULT</b> the appropriate section of the Emergency Plan for notification requirements.
5	<b>DISPATCH</b> the required personnel to complete any required repairs.
6	After necessary repairs have been completed and company facilities are back in service, <b>RESTORE</b> service to all customers.



**NOTE:** Repair actions must comply with the applicable SOP's and the Engineering Standards.

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**7.8.3  
Emergency  
Response  
Review**

Perform a review of all emergency response incidents for determining the effectiveness of procedures and the Area Emergency Response Plan. Evaluate the response of company personnel to determine training is effective and compliance with procedures and their effectiveness after each emergency or incident. Initiate any required changes to procedures or the Area Emergency Response Plan using *SOP HLA.03 Management of Change*. For any noted noncompliance with procedures, refer to *SOP HLA.18 Operator Qualification*. Refer to *SOP HLA.10 Emergency Response Exercises* for further instruction and documentation of this activity.

**7.9  
Emergency  
Response  
Training**

Conduct training with all employees and include an annual review of the Area Emergency Response Plan and this procedure to verify that employees are familiar with the plans and procedures and subsequent changes as a result of past experience or other requirements. Refer to *SOP HLA.10 Emergency Response Exercises* for further instruction and documentation of this activity.

**7.10  
Emergency  
Assembly Areas**

Perform the following steps to declare emergency assembly areas.

Step	Activity
1	<b>ESTABLISH</b> two locations, for each pump station or other significant company facility as determined by the Safety Department, where all personnel at the site during an emergency, real or otherwise, will gather and be accounted for when so advised.
2	<b>USE</b> that day's work assignments and the Visitor Log to help account for personnel on site at the time of the emergency.
3	<b>DESIGNATE</b> one location as the Primary Emergency Assembly Area and the second location as the Alternate Emergency Assembly Area.
4	<b>IDENTIFY</b> these locations by signs
5	<b>ADVISE</b> all visitors to the location of the assembly areas and the requirement to immediately go there when notified or when certain alarms are sounded.
6	<b>MAINTAIN</b> a copy of this manual at the Primary Emergency Assembly Area.

**7.11  
Liaison with  
Community  
Response  
Agencies and  
Utilities**

Refer to *SOP HLI.40 Public Awareness Plan - Communication with APT RP1162 - defined Stakeholders* for detailed requirements related to maintaining familiarity with local emergency response agencies.

**8.0  
Documentation  
Requirements**

Record data in electronic database or utilize the following form(s) as applicable:

- A.15.A Incident Report Log

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- A.08.A Emergency Response Training

**9.0**

**References**

HLA.03 Management of Change  
 HLA.04 Initial Reporting, and Investigating Events  
 HLA.10 Emergency Response Training Exercises  
 HLA.11 Investigations of Failures  
 HLA.12 Safety Related Condition Reporting  
 HLA.15 PHMSA- State - Incident Reporting  
 HLA.18 Operator Qualification  
 HLA.19 Area Emergency Response Plan Development  
 HLA.20 Field Response to Natural Hazards and Potential Disasters  
 HLI.40 Public Awareness Plan - Communication with APT RP1162 - defined Stakeholders  
 Safety Procedure S-370 Work Permits  
 Safety Procedure S-50 Combustible Gas Indicators/Toxic Atmosphere Monitoring

**Appendix A:  
OQ Task  
Requirements**

There are no Operator Qualification (OQ) tasks required for this procedure.

**Appendix B:  
Pre-Planned  
Incident Action  
Plans**

The following typical emergency scenarios and associated Incident Action Plans (IAP) are provided for quick reference and should be included in the Area Emergency Response Plan and supplemented with other specific IAPs as appropriate for the location.

**B.2  
Fire Near or  
Involving  
Company  
Facilities**

Perform these steps to respond to fires near company facilities

<b>Step</b>	<b>Activity</b>
1	<b>KEEP</b> a safe distance. <b>SECURE</b> the area, and <b>RESTRICT</b> access to trained personnel only.

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Step	Activity
2	<p><b>CONTACT</b> the Area Office or Liquid Control with the following information:</p> <ul style="list-style-type: none"> <li>• A description of the situation</li> <li>• The location of the fire and your relative location</li> <li>• An assessment of whether company personnel can handle the fire</li> <li>• A request for what assistance needed.</li> </ul>



**NOTE:** The Area Office or Liquid Control will notify necessary emergency response agencies, including fire departments as necessary; dispatch company personnel and equipment; log times of significant events; and coordinate offsite activities and monitor communications.

Step	Activity
3	<b>EVACUATE</b> any adjacent facilities or buildings that may be endangered. <b>WAIT</b> for assistance to arrive if assistance is necessary.
4	If the fire is due to escaping gas or some other flammable material, <b>ELIMINATE</b> the flammable fuel source if possible.
5	<b>EVALUATE</b> the need and capability to extinguish the fire. <b>USE</b> appropriate fire fighting equipment and proper fire fighting techniques.
6	If the fire is to be contained by a fire department, and the fire involves escaping gas or company facilities, <b>INFORM</b> the Incident Commander (normally the Fire Chief) of what to do and what not to do regarding the fire and the company facilities. <b>PLAN</b> to become a part of the Incident Command Staff keeping the Commander informed of the company's actions to eliminate the source.
7	<b>ALLOW</b> the fire to burn out by itself, if that is desirable because of escaping product or comparable flammable material.

**B.3  
Explosion Near  
or Involving  
Pipeline  
Facilities**

Perform these steps to respond to an explosion near or involving pipeline facilities.



**WARNING:** If one explosion has occurred, particularly where no fire is burning, be especially alert to the possibility that additional explosions could occur.

Step	Activity
1	<b>KEEP</b> a safe distance. <b>SECURE</b> the area, and <b>RESTRICT</b> access to trained personnel only.
2	<b>EVACUATE</b> any adjacent facilities or buildings that may be endangered.
3	<b>WAIT</b> for assistance to arrive if assistance is necessary.

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Step	Activity
4	<p><b>CONTACT</b> the Area Office or Liquid Control and report a description of the situation as follows:</p> <ul style="list-style-type: none"> <li>• The number of injuries or people in danger</li> <li>• Facility damage or facilities in jeopardy of damage</li> <li>• Any fire or leaking gas</li> <li>• The location where the explosion occurred and your relative location</li> <li>• An assessment of whether company personnel can handle the situation</li> <li>• A request for what assistance is needed</li> </ul>



**NOTE:** The Field Office or Liquid Control will notify necessary emergency response agencies, including fire departments as necessary; dispatch company personnel and equipment; log times of significant events; and coordinate offsite activities and monitor communications.

**B.4  
Natural  
Disasters**

Refer to *SOP HLA.20 Field Response to Natural Hazards and Potential Disasters* for response to natural hazards including:

- Tornados
- Tropical Storm and Hurricane
- Flooding
- Wildfire
- Earth Movement

**B.5  
Pump Station  
Emergency  
Response  
Procedures**

Perform these steps for emergencies or accidents at pump stations.



**CAUTION:**

- Whenever a sound is heard that may indicate escaping vapor in or near a pump station, or if there appears to be an unusual odor of gas in the area, operate the emergency shutdown system and evacuate the area immediately.
- Implementation of these emergency procedures does not provide a relaxation of the Maximum Operating Pressure (MOP) limits.

Step	Activity
1	All personnel shall <b>CLEAR AWAY</b> from the hazardous area at first indication of danger and <b>TRIP</b> the Emergency Shutdown Stand, if possible, without endangering themselves.
2	<b>GO</b> to the Emergency Assembly Area or an alternate in case the first designated area is hazardous, as soon as possible.

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Step	Activity
1	All personnel shall <b>CLEAR AWAY</b> from the hazardous area at first indication of danger and <b>TRIP</b> the Emergency Shutdown Stand, if possible, without endangering themselves.
3	<b>DO NOT RE-ENTER</b> the danger area for any reason until the hazard has been determined and corrected or controlled.



**NOTE:** The person on duty in the highest position responsible for the operation of the station at the time of the emergency shall be in charge until relieved of this responsibility. This person is solely responsible to handle the emergency and to give all instructions and directions necessary.

Step	Activity
4	<b>USE</b> radio equipment or voice for communication. <b>DO NOT USE</b> hand signals.
5	<b>ASSIGN</b> a person to handle communications according to instructions in this manual at the Communications Center.

**B.6  
Onshore  
Pipelines  
Emergency  
Response  
Procedures**

Follow these procedures for emergencies or incidents for onshore pipeline facilities.



**CAUTION:** Under no circumstances must the Maximum Operating Pressure (MOP) be exceeded

Step	Activity
1	If delivery stations are connected to more than one pipeline, <b>CLOSE</b> the supply from the affected line and <b>MAKE CERTAIN</b> that product is flowing from the non-affected line. <b>NOTIFY</b> the Liquid Control of which valves are operated open, closed, or checked open or closed, and the time of the action.
2	With the acknowledgment and acceptance of Liquid Control, <b>REROUTE</b> the flow through operating line segments.
3	<b>SHUT OFF</b> all cathodic units that could possibly affect the area of the pipeline that will be repaired.



**NOTE:** Impressed current cathodic protection creates current flow through the pipelines. Even though the pipes are grounded during repair, it is important to minimize the chance that a spark could jump between pipe segments during hot tie-ins.

Step	Activity
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Step	Activity
4	<b>ARRANGE</b> for necessary heavy equipment.
5	<b>ALERT</b> the Central Warehouse, and <b>ARRANGE</b> for material, if required.
6	<b>MAKE</b> repairs with properly rated and/or tested materials.
7	<b>NOTIFY</b> Liquid Control and affected locations when facility is ready to be returned to service.
8	<b>RETURN</b> all facilities to normal operation.
9	<p><b>PROVIDE</b> gate valve setting diagrams on which are included:</p> <ul style="list-style-type: none"> <li>• Directions to the valve site from the locations' office</li> <li>• GPS coordinates (longitude, latitude, and elevation)</li> <li>• Instructions of which valves to operate in order to isolate a section of pipeline and how to blow down the section (including any precautions for overhead obstructions, liquids that may be present, and noise considerations)</li> <li>• Instructions of what measuring stations are in the valve section being isolated and how to handle them; when to notify affected parties and who to notify</li> <li>• Instructions of which emergency response agencies to notify and which have jurisdiction in the vicinity of the valve site</li> <li>• All Pipeline MOPs</li> </ul> <p>It is not necessary to maintain a copy of these diagrams at the site.</p>

**Appendix C:  
Safe Approach  
to Potentially  
Hazardous  
Areas**

Follow this Appendix for Safe Approach to Potentially Hazardous Areas

**1. Safe Approach to Potentially Hazardous Areas and Determination of the Safe Area to initiate Atmospheric Monitoring**

a. The initial response distances based on the Emergency Response Guidebook, are provided as guidelines to assist employees in the initial determination of the hazardous area.

- The distances provide the employee with the theoretical size of the hazardous area.
- These distances may be used in determining the safe location to initiate atmospheric monitoring.
- The actual hazardous area must be verified in the field using atmospheric monitoring.
- Cautious Approach must be used, because field variables may cause the hazardous area to differ from the theoretical distances.
- Variables include the following pipe size, product type, terrain and wind speed.

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- b. Based on the reported magnitude of the leak, the following resources will be used to determine the initial distance to begin. Use the Emergency Response Guidebook (ERG) as a resource.
- When determining the initial area to be monitored, the Department of Transportation Emergency Response Guidebook (ERG) may be used as appropriate to supplement known information.
    - The ERG provides initial evacuation distances.
    - These distances may be used along with other information in determining the safe location to initiate atmospheric monitoring.
- c. Direction of Scene Approach
- Initial approach should always be with caution, and whenever possible or feasible for the direction:
    - Upwind or crosswind of the spill or release area.
    - Uphill of the spill or release area.
- d. Constantly be aware of any indications of a pipeline failure or release:
- Visible Clues: Such as fire, gas cloud, blowing gas, blowing dirt, ice ball, pooling of running liquid.
  - Audible Clues: Such as hissing, roaring, or other sounds of relieving pressure.
  - Odor Clues: Such as any hydrocarbon, odorant, or other unusual odor.
  - In the event indications are present:
    - Begin atmospheric monitoring for hazardous atmospheres or imminently dangerous conditions, to confirm if hazardous atmospheres exist.
- e. In the event there are no indications of a release, consider the following conditions when determining when and where to initiate atmospheric monitoring for hazardous conditions:
- Product characteristics
    - Products that are lighter than air will rise in the atmosphere.  
Example – Natural Gas, Methane
    - Products that are heavier than air will lay close to the ground and follow terrain features.  
Example – Propane, Butane
  - Magnitude of spill or release
    - Increased release of product from the pipe will result in both larger hazardous area and evacuation distances.
  - Duration of spill or release
    - Increased release or leak time may also result in both larger hazardous area and evacuation distances.
  - Weather
    - Weather conditions such as ambient temperatures below freezing may increase the dispersion distances.
  - Wind direction and speed
    - The vapor cloud and hazardous area will move in the direction of the wind.
    - Increased wind speeds will increase the spread of the hazardous area in the direction of the wind.

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- Low or no winds may result in vapor dispersion more equally in all directions.

- Terrain

- Heavier than air products and flowing liquids will follow terrain features in a downward slope.

- The vapor cloud and flowing liquids may move downhill, following; washes, creeks, streams, and other low areas.

- Culverts

- If present, heavier than air vapors and flowing liquids, may enter storm culverts or open manholes.

f. Additional Distance should be considered:

- When approach must be made from downwind
- When there are low or no winds
- When ambient weather conditions are below freezing
- In larger volume leaks or releases
- In longer duration leaks or releases



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## PURPOSE

Conduct gas testing/air monitoring to ensure flammable conditions do not exist and employees will not be exposed to harmful concentrations of toxic or chemical substances, or oxygen deficient atmospheres. (When "Gas Testing" is referenced in this procedure it includes toxic, chemical or oxygen deficient atmospheres)

## I. RESPONSIBILITIES FOR EQUIPMENT PREPARATION

- A. The operating organization is responsible for the designation and preparation of equipment for work, including any associated gas testing. In defining the job to be done, it may be necessary to consult with personnel from other departments, i.e., the group performing the work. When the equipment has been selected and the job defined, the responsible person will ensure proper preparations of the equipment that may include:
1. Draining.
  2. Washing with water.
  3. Ventilating with air.
  4. Steaming.
  5. Purging.
  6. Cleaning.
  7. Lock-out.
- B. Periodic gas tests may be required to assist operating personnel with the various steps of equipment preparation.

## II. GAS TESTING REQUIRED

When the equipment has been properly prepared, the "job site" is ready for gas testing. The gas testing to fulfill requirements of the Work Permit Program must be performed, i.e. general work permit, hot work permit and/or confined space entry permit.

## III. PERFORMING GAS TESTS

- A. When a gas test is required, the responsible employee or inspector will note this fact on the permit and will also specify the particular gas tests needed.
- B. Before going to work on the site, the gas tester must:
1. Understand the specific equipment involved and the gas tests to be performed.
  2. A functional check or bump test of the oxygen and combustible gas meters should be carried out before each day's use. This test shall consist of exposing the detectors to a known gas concentration high enough to verify the actual reading and the alarm settings and response. Any detector that fails the bump test shall be removed from service until the proper repairs and/or calibration is performed.
  3. Select the correct length of stain (i.e. Drager, MSA) tube when tests for toxic substance are specified. (See Appendix I for listing.)
  4. Perform gas tests stipulated on the work permit in accordance with the following guidelines:
    - a) Permit Entry Confined Space
      - 1) When entry into a permit entry confined space is necessary, the gas tester must be provided with supplied air respiratory protection and any other protective



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equipment that may be needed. This equipment may include impervious boots, chemical resistant slicker suit, gloves, etc.

- 2) Ventilation must be stopped 15 minutes prior to conducting the gas tests except when continuously monitoring.
  - 3) Perform gas tests throughout tanks, drums, towers or excavations and in areas where it may be possible for gas to be trapped in dead end nozzles, plugged down-comers, structural members, etc.
  - 4) Perform gas tests in all levels of taller vessels. Some gases are heavier than air and tend to fall to the bottom and some gases are lighter, and will rise to the top.
- b) Inert Atmospheres  
Using a gas tester to analyze an inert gas atmosphere can produce a false reading. Consult the manufacturer for special gas test equipment adapter requirements.
- c) Open Areas
- 1) The primary concern in open areas is flammable/combustible gas. Gas tests for toxic substances should also be conducted if their presence is suspected.
  - 2) Gas tests should be made at all openings of the equipment and in the area surrounding where the work is to be performed.
  - 3) Test at sewer openings, open vents, bleeds and at any other possible locations in the area where leaks may be suspected.
- d) General
- 1) It is recommended that gas testing should be continued throughout the course of the work or at specified intervals, i.e., hot work in an area when conditions could change or tank cleaning when the work may cause a change in conditions (agitating sludge or other by products).
  - 2) At a minimum Gas testing must be repeated when:
    - a) Two or more hours passes between the test and the start of the work.
    - b) The work is stopped and resumes at a later time.
  - 3) Record the results of the gas tests and sign the work permit.
  - 4) Appendix I provides data on limits of certain toxic materials.

## IV. GAS TESTING INSTRUMENTS

### A. Maintenance And Calibration

1. To ensure proper operations and meter responses, it is important to maintain and calibrate all instruments. The following establishes responsibilities and methods by which maintenance and calibration will be accomplished.
2. Purchase a calibration kit from the vendor. Use the calibration kit to verify meter calibration when used on a continuous basis in accordance with the manufacturer's recommendations. Calibration should be conducted **monthly** unless otherwise recommended by the manufacturer.
  - a) Calibration is performed by using a known gas/air mixture to ensure the meter response is accurate.
3. Place a "calibrated" sticker on instruments immediately after calibration. Include date and initials of person performing the calibration Record the calibration checks in the appropriate log.
4. Gas test instruments not operating properly or unable to be calibrated should be tagged "DANGER- Do Not Operate" and sent to the appropriate vendor for necessary repair.



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- 5. All instruments not calibrated at the frequency recommended by the manufacturer (or monthly) should be tagged "Do Not Use Until Calibrated."
- B. Length of Stain Gas Detector (i.e. Drager, MSA) tubes tests for a wide variety of contaminants can be made with this instrument. A partial listing of Drager tubes is in Appendix I.
- V. TRAINING**  
All employees assigned gas testing duties or responsibilities must be trained prior to conducting gas testing.
- VI. RECORDS/RETENTION**
  - A. Maintain most recent training documentation in a company approved database.
  - B. Maintain gas testing instrument calibration log current year plus one.



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## APPENDIX I DIRECT READING INSTRUMENTS

Gases/Vapors to be Measured	Drager Tube to be Used	Measuring Range for Tube to be Used	Exposure Limits (Eight Hour Time Weighted Average unless Noted Otherwise)
Acetic Acid	Acetic Acid 5A	5 ppm-80 ppm	10ppm or 25 mg/m <sup>3</sup>
Acetone	Acetone 100/b	100 ppm-12,000ppm	750 ppm or 1800 mg/m <sup>3</sup> STEL: 1000 ppm or 2400 mg/m <sup>3</sup>
Benzene	Benzene 0.5/a	0.5 ppm-10 ppm	1 ppm
Butane	Hydrocarbons 0.1%/b	0.1-0.8 volume %	800 ppm or 1900 ppm
N- Butyl Alcohol	Alcohol 100/a	100 ppm- 3,000 ppm	50 ppm or 150 mg/m <sup>3</sup>
Chlorine	Chlorine 0.3/b	0.3 ppm - 5 ppm	1 ppm or 3 mg/m <sup>3</sup>
Carbon Monoxide	Carbon Monoxide 2/a	2 ppm - 300 ppm	* 50 ppm or 55 mg/m <sup>3</sup>
* 1,1 Dichloroethane	Methyl Chloroform	30 ppm - 1300 ppm	100 ppm or 400 mg/m <sup>3</sup>
1,2 Dichloroethane (Ethylene Dichloride)	Methyl Bromide 5/b	30 ppm - 300 ppm	* 200 ppm or 790 mg/m <sup>3</sup>
Diethyl Amine	Triethylamine 5/a	5 ppm - 60 ppm	10 ppm or 30 mg/m <sup>3</sup> STEL: 25 ppm or 75 mg/m <sup>3</sup>
Ethanolamine	Hydrazine 0.25/a	2.5 ppm - 30 ppm	* 3 ppm or 6 mg/m <sup>3</sup> STEL: 6 ppm or 15 mg/m <sup>3</sup>
Ethylene Glycol	5 Ethylene Glycol 10 oz.	10 mg/m <sup>3</sup> - 180 mg/m <sup>3</sup>	Ceiling: 50 ppm or 125 mg/m <sup>3</sup>
Formaldehyde	Formaldehyde 0.2/a	0.2 ppm - 5 ppm	0.75 ppm STEL: 2 ppm



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Gases/Vapors to be Measured	Drager Tube to be Used	Measuring Range for Tube to be Used	Exposure Limits (Eight Hour Time Weighted Average unless Noted Otherwise)
Formic Acid	Formic Acid 1/a	2 mg/m <sup>3</sup> - 50 mg/m <sup>3</sup>	5 ppm or 9 mg/m <sup>3</sup>
Hydrochloric Acid	Hydrochloric Acid 1/a	0.5 ppm - 25 ppm	Ceiling: 5 ppm
Mercury Vapor	Mercury 0.1/b	0.1 mg/m <sup>3</sup> - 2 mg/m <sup>3</sup>	0.05 mg/m <sup>3</sup>
Methane	5 Natural Gas Tube	Qualitative	NA
Methanol (Methyl Alcohol)	Methanol 50/a	50 ppm - 3000 ppm	200 ppm or 260 mg/m <sup>3</sup>
Methyl Ethyl Ketone (2-Butanone)	Acetone 100/b	100 ppm - 12,000 ppm	200 ppm or 590 mg/m <sup>3</sup>
Methyl Isobutyl Ketone (Hexone)	Acetone 100/b	130 ppm - 15,600 ppm	* 100 ppm or 410 mg/m <sup>3</sup>
Naphthalene	Not Available	Use Charcoal Tube Carbon Disulfide Regent	10 ppm or 50 mg/m <sup>3</sup>
Nitric Acid	Nitric Acid 1/a	1 ppm - 50 ppm	2 ppm or 5 mg/m <sup>3</sup>
Naphtha	Not Available	Use Charcoal Tube Carbon Disulfide Regent	100 ppm or 400 mg/m <sup>3</sup>
Propane	Hydrocarbons 0.1%/b	0.5 - 1.3% Vol.	1000 ppm or 1800 mg/m <sup>3</sup>
Propylene	Olefins 0.05%/a	1 mg/l - 55 mg/l	NA
Sulfur Dioxide	Sulfur Dioxide 0.1/a	0.1 ppm - 3 ppm	* 5 ppm or 13 mg/m <sup>3</sup>
Sulfuric Acid	9 Sulfuric Acid 1/a	1 mg/m <sup>3</sup> - 5 mg/m <sup>3</sup>	1 mg/m <sup>3</sup>
Toluene	Toluene 5/a	5 ppm - 500 ppm	100 ppm or 375 mg/m <sup>3</sup>



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Triethylamine	Triethylamine	5 ppm - 60 ppm	* 25 ppm or 100 mg/m3
Xylenes	O-Xylenes 10/a	10 ppm - 400 ppm	100 ppm or 435 mg/m3