



## OPERATIONS OFFICES

P.O. BOX 10, NEWCASTLE, WYOMING 82701  
Phone# 307-746-9479 · Fax # 307-746-3606

November 21, 2013

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

Certified Mail No. 7011 0470 0001 3149 1074  
Return Receipt Requested

RE: CPF 5-2013-6001M Notice of Amendment

Dear Chris:

Attached you will find a copy of the actions taken, as requested by yourself in a June 26, 2013 letter addressed to Bob Neufeld, to bring Wyoming Pipeline Company into complete compliance with the pipeline safety regulations. With the large amount of changes to the documents, when the documents are finalized a complete copy of the documents will be sent to you.

If you have any questions or comments concerning the above mentioned documents, please contact me at the refinery (307) 746-4445 ext. 120 between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday.

Sincerely

A handwritten signature in blue ink, appearing to read "Nelson D. Holwell".

Nelson D. Holwell  
Pipeline Manager/ Operations Engineer

Cc: Bob Neufeld  
DOT 2013 Correspondence

1. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

WPC's Operations and Maintenance (O&M) Procedure Manual did not include a provision in their manual to address the design and construction of a pipeline to allow passage of in-line inspection (ILI) devices as required by §195.120(a). Each new pipeline and/or each line section of a pipeline where the line pipe or components have been replaced must be designed and constructed to accommodate passage of instrumented internal inspection devices. WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirements of §195.120(a) for new construction.

**Response:**

From WPC Maintenance Manual § 4.063

4.063 Materials

1. Replacement Pipe

Where practical, pipe used for replacement shall conform to the specification of the pipe being replaced including process of manufacture, grade, wall thickness, minimum mill hydrostatic test, and any supplementary specifications. All repairs to the pipeline shall accommodate pigs. In cases where such pipe is not available, new replacement pipe shall conform to the specification. In cases where such pipe is not available, new replacement pipe shall have internal pressure design wall thickness equal to or greater than the pipe being replaced, and shall have sufficient wall thickness to withstand external pressure, if any. When an entire section of pipeline is to be constructed or replace, that section must be designed and constructed so an in-line inspection tool can pass through the new section of pipe as per §195.120(a).

2. §195.402 Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

WPC did not establish adequate written procedures for analyzing pipeline accidents to determine the cause as required by §195.402(c) (5). WPC's O&M procedure is inadequate because they did not clearly describe what actions must be taken to meet the requirement of section §195.402 (c) (5).

**Response:**

**From WPC Operations Manual § 9A**

A. Accident Investigations

If an accident were to occur, Wyoming Pipeline Company utilizes the following accident investigation procedure.

- 1.) Statements are taken from all personnel involved in the accident.
- 2.) All personnel involved in operation of the crude pipeline at the time of the accident shall be taken in for a drug and alcohol test.
- 3.) An investigation committee is formed consisting of:
  - a. Pipeline Manager
  - b. Pipeline Supervisor
  - c. Plant Safety Supervisor
  - d. Personnel Involved
  - e. Shift Supervisor of personnel involved

Committee goes over all details of accident and attempts to find cause/causes.

- 1.) Operator qualifications and testing records shall be examined to find if personnel involved were supposed to be participating in the pipeline operation.
- 2.) Committee will review operating procedures and modify or add additional procedures to prevent the accident from occurring in the future and write up other recommendations.
- 3.) Committees findings are presented to VP of Refining for review and comments
- 4.) Incident Investigation Report Form is completed and filed. A copy of Wyoming Refining/Pipeline Company's Incident Investigation Report Form is shown below

Wyoming Refining/Pipeline Company shall maintain liaisons with local fire, police and other appropriate public officials to learn the responsibilities and resources available for emergency use.

3. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

WPC did not establish adequate written procedures for minimizing the potential for hazards and the possibility of recurrence of accidents as required by §195.402 (c) (6).

**Response:**

**From WPC Operations Manual § 9A**

**A. Accident Investigations**

If an accident were to occur, Wyoming Pipeline Company utilizes the following accident investigation procedure.

- 4.) Statements are taken from all personnel involved in the accident.
- 5.) All personnel involved in operation of the crude pipeline at the time of the accident shall be taken in for a drug and alcohol test.
- 6.) An investigation committee is formed consisting of:
  - f. Pipeline Manager
  - g. Pipeline Supervisor
  - h. Plant Safety Supervisor
  - i. Personnel Involved
  - j. Shift Supervisor of personnel involved

Committee goes over all details of accident and attempts to find cause/causes.

- 5.) Operator qualifications and testing records shall be examined to find if personnel involved were supposed to be participating in the pipeline operation.
- 6.) Committee will review operating procedures and modify or add additional procedures to prevent the accident from occurring in the future and write up other recommendations.
- 7.) Committees findings are presented to VP of Refining for review and comments
- 8.) Incident Investigation Report Form is completed and filed. A copy of Wyoming Refining/Pipeline Company's Incident Investigation Report Form is shown below

Wyoming Refining/Pipeline Company shall maintain liaisons with local fire, police and other appropriate public officials to learn the responsibilities and resources available for emergency use.

4. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of the subpart and subpart H of this part.

WPC's O&M Procedure Manual did not include a section to address signage at pump stations and breakout tank areas. Signage at pumping stations and breakout tank areas are necessary to ensure the operator can be reached at all times, including emergencies, as required by §195.434. WPC's O&M procedure is inadequate because they did not clearly describe where signage must be maintained to meet the requirements of §195.434.

**Response:**

**From WPC Maintenance Manual § 4.031**

4.031 **Security**

1. **Building**

Inspect windows and window locks for breakage and/or deterioration; doors including hinges and locks; company warning signs for painting and deterioration. All the signage should be legible and contain the following information; Wyoming Pipeline Company and 24-hr phone number.

2. **Fences**

Inspect gates for hinge freedom; locks for breakage and/or deterioration; company warning signs for painting and deterioration. All the signage should be legible and contain the following information; Wyoming Pipeline Company and 24-hr phone number.

5. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirement of this subpart and subpart H of this part.

WPC did not establish adequate written procedures for testing, inspecting, and maintaining an overfill protection system at the required intervals per §195.428(c) and according to API Recommended Practice 2350. Overfill devices are required for aboveground breakout tanks that are constructed or significantly altered after October 2, 2000 as required by §195.428 (c), unless an operator notes in the manual required by §195.402 why compliance with that part is not necessary for safety of the tank. Therefore, WPC's O&M procedure is inadequate because they did not clearly describe what actions must be taken to meet the requirement of §195.428(c).

**Response:**

WPC is currently addressing this issue by installing a new Yokogawa SCADA system with advanced communications. This system will allow for advanced interlocks between stations. Interlocks will include but not be limited to:

- a. LACT unit pump shutdowns at station with high tank levels at the station
- b. main line pump shutdowns at station with high tank levels at the adjoining station,
- c. main line pump shutdowns at station with low tank levels at the station,
- d. high pump discharge pressures,
- e. low pump suction pressures,
- f. sudden pressure drop main line shutdown

This system is scheduled to come online in the Spring of 2014 at which time procedures will be put in place for the requirements of §195.428(c) and according to API Recommended Practice 2350 and inserted in WPC Operation and Maintenance Manual .

6. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

WPC did not establish adequate written procedures for inspecting the physical integrity of in service atmospheric aboveground breakout tanks according to API Standard 653 as required by §195.432(b), e.g. routine in-service inspections(monthly),external inspection. WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirements of §195.432(b).

**Response:**

**From WPC Maintenance Manual § 4.036**

4.036 **Breakout Tanks**

The crude system has 4 breakout tanks in use. There is 1-10,000 bbls at HA Creek, 1-20,000 and 1-10,000 bbl at Fiddler Creek and 1-5,000 bbl at Skull Creek. All other tanks are main crude LACT receiving and Blending tanks for crude to the refinery.

WPC personnel shall conduct a physical inspection of the external condition of all breakout tanks per §195.432(b) (API 653 § 6.31). This requires monthly in-service inspections including a visual inspection of the tanks external surface. Evidence of leaks, shell distortion, signs of settlement, corrosion, and condition of the foundation, paint coating, insulation system (if any) and appurtenances should be documented.

7. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirement of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures for maintaining the daily operating records as required by §195.404(b).

**Response:**

WPC is currently addressing this issue by installing a new Yokogawa SCADA system with advanced communications. This system will allow for data retention for all parameters monitored by the SCADA system on a continuous basis.

This system is scheduled to come online in the Spring of 2014 at which time data retention of daily operating records as required by §195.404(b) will be maintained and written procedures pertaining to daily operation record retention will be in place and inserted in WPC Operations and Maintenance Manual.

**8. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures for maintaining current records or maps to show the location of cathodically protected pipelines, cathodic protection facilities, and neighboring structures bonded to cathodic protection systems as required by subpart H, §195.589(a). WPC's O&M procedure is inadequate because they did not clearly describe what actions must be taken to meet the requirement of §195.589(a).

**Response:**

Per §195.12 (c)(2)(iv) and §195.12 (c)(3)(A)(iii), WPC is not required to comply with Subpart H – Corrosion Control until Oct. 1, 2014, however WPC is currently scheduling to have a third party contractor in to perform a close interval survey for the entire crude rural low-stress pipeline in the Spring of 2014. During this survey, UPS coordinates will be taken of all facilities, rectifiers, test stations and other structures required by §195.589(a). These items will be mapped and retained for the time periods required by §195.589(c). WPC will prepare written procedures for maintaining current records or maps to show the location of cathodically protected pipelines, cathodic protection facilities, and neighboring structures bonded to cathodic protection systems during this survey and insert these procedures in the Cathodic Protection Manual.

**9. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. This manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures to address when and how cathodic protection system used to control corrosion on the bottom of an aboveground breakout tank must be inspected per subpart H, §195.573(d). Each cathodic protection system used to control corrosion on the bottom of an aboveground breakout tank must be inspected in accordance with API Recommended Practice 651 as required by §195.573(d), unless operator notes in the corrosion control procedures established under §195.402(c) (3) why compliance with all or certain operation and maintenance provisions of API RP 651 is not necessary for the safety of the tank. Meanwhile, WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirements of section §195.573(d)

**Response:**

Per §195.12 (c)(2)(iv) and §195.12 (c)(3)(A)(iii), WPC is not required to comply with Subpart H – Corrosion Control until Oct. 1, 2014, however WPC is currently scheduling to have a third party contractor onsite to perform a close interval survey for the entire crude rural low-stress pipeline in the Spring of 2014. During this survey, written procedures to address when and how cathodic protection system used to control corrosion on the bottom of an aboveground breakout tank must be inspected per subpart H, §195.573(d) will be prepared and inserted in the Cathodic Protection Manual.

10. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures to describe the circumstance in which a CIS or comparable technology is practicable and necessary, as required by subpart H, §195.573(a)(2), and in accordance with paragraph 10.1.3 of NACE SP 0169. Each operator must identify not more than 2 years after cathodic protection is installed, the circumstances in which a close-interval survey or comparable technology is practicable and necessary as required by §195.573(a)(2). WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirements of §195.573(a)(2).

**Response:**

Per §195.12 (c)(2)(iv) and §195.12 (c)(3)(A)(iii), WPC is not required to comply with Subpart H – Corrosion Control until Oct. 1, 2014, however WPC is currently scheduling to have a third party contractor onsite to perform a close interval survey for the entire crude rural low-stress pipeline in the Spring of 2014. During this survey, written procedures to describe the circumstance in which a CIS or comparable technology is practicable and necessary, as required by subpart H, §195.573(a)(2) will be prepared and inserted in the Cathodic Protection Manual.

11. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures for defining the interference bonds (critical and non-critical) and how to electrically check for proper performance of each bond as required by subpart H, §195.573 (c). The O&M manual needs to address the difference between critical and non-critical bonds and how to inspect the two (2) types. Interference Bond whose failure would jeopardize structural protection must be inspected as required by §195.573(c). WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirement of §195.573 (c).

**Response:**

Per §195.12 (c)(2)(iv) and §195.12 (c)(3)(A)(iii), WPC is not required to comply with Subpart H – Corrosion Control until Oct. 1, 2014, however WPC is currently scheduling to have a third party contractor onsite to perform a close interval survey for the entire crude rural low-stress pipeline in the Spring of 2014. During this survey, written procedures for defining the interference bonds (critical and non-critical) and how to electrically check for proper performance of each bond as required by subpart H, §195.573 (c) will be prepared and inserted in the Cathodic Protection Manual.

**12. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

WPC did not establish adequate written procedures for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and other structures as a single unit per subpart H, §195.575(a), e.g. casings, custody transfer points/flanges. WPC's O&M procedure is inadequate because they did not clearly describe how their personnel will implement the requirements of §195.575(a)

**Response:**

Per §195.12 (c)(2)(iv) and §195.12 (c)(3)(A)(iii), WPC is not required to comply with Subpart H – Corrosion Control until Oct. 1, 2014, however WPC is currently scheduling to have a third party contractor onsite to perform a close interval survey for the entire crude rural low-stress pipeline in the Spring of 2014. During this survey written procedures for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and other structures as a single unit per subpart H, §195.575(a) will be prepared and inserted in the Cathodic Protection Manual.

13. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

WPC did not establish adequate written procedures to address training program to instruct emergency response personnel to the following types of emergencies: carry out the emergency procedures that relate to their assignments, know the characteristics and hazards of hazardous liquids transported, recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids spills, and take appropriate corrective action, take steps necessary to control any accidental release of hazardous liquid and to minimize the potential for fire, explosion, toxicity, or environmental damage and learn the potential causes, types, sizes and consequence of fire and the appropriate use of simulated pipeline emergency condition. WPC's emergency procedures must clearly describe what actions must be taken to meet the minimum emergency scenario requirements of §195.403(a).

**Response:**

All of this information is contained in WPC Crude Pipeline Oil Spill Response Plan Sequence No. 267. This is a large amount of information and WPC is preparing to submit an updated version of this document to the US DOT in December of this year and a copy can be sent to PHMSA at that time.

14. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

WPC did not establish adequate written emergency procedures for reviewing with personnel their performance in meeting the objectives of the emergency response training program. It also did not include a requirement for making appropriate changes to the emergency response training program as necessary to ensure that it is effective. Each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, review with personnel their performance and make appropriate changes to the emergency response training program as required by §195.403(b). WPC's emergency procedure is inadequate because they did not clearly describe what actions must be taken to meet the requirements of §195.403(b).

**Response:**

All of this information is contained in WPC Crude Pipeline Oil Spill Response Plan Sequence No. 267. WPC is preparing to submit an updated version of this document to the US DOT in December of this year.

**SECTION 6**  
**TRAINING & EQUIPMENT TESTING PROCEDURES**  
**WYOMING PIPELINE COMPANY (WPC)**  
**Crude Pipeline Oil Spill Response Plan**

1) **Operations Personnel Responsibilities & Training Procedures**

**PIPELINE CONTROLLERS**

- a) Perform tabletop drills with Manager or Operations Foreman, semi-annually if possible but at least annually.
- b) On job training (OJT) is using qualified Controller, with new or relief Controller. This is done when training and to refresh relief Controller before relief assignments.
- c) Attend Operations/Safety Meetings with all personnel. Coordinating discussions are reviewed at this time.
- d) Attend fire and emergency meetings annually.
- e) Attend a fire drill annually.
- f) Attend an annual breathing apparatus drill.
- g) Complete all required modules in the Computer Based Training system

2) **Maintenance Personnel Responsibilities & Training Procedures**

**PIPELINE EQUIPMENT OPERATORS**

- a) Perform an equipment deployment drill and inventory annually. This may be announced or unannounced.
- b) Receive OJT on all pipeline leak response equipment supervised by the Maintenance Foreman.
- c) Receive OJT on pipeline operations from Pipeline Controllers or the Operations Foreman on a routine basis.
- d) Attend fire and emergency meeting held annually.
- e) Attend an annual fire drill.
- f) Attend a self-contained breathing apparatus drills are performed annually.
- g) Attend Operations/Safety Meeting monthly.
- h) Complete all required modules in the Computer Based Training system

3) **Qualified Individual's Responsibilities & Training Procedures**

- a) Read and review the Spill Response Plan and make appropriate changes so plan is effective. (All)
- b) Understand response requirements and equipment. (All)

- c) Teach assigned subjects to operators and maintenance personnel. (All)
- d) Maintain liaison with Response Contractors. (Maintenance Foreman)
- e) Update Response Manuals. (Operations Foreman)
- f) Ensure all response equipment, fire response equipment and firefighting equipment is operating and properly maintained. (Maintenance Foreman)
- g) Complete all required modules in the Computer Based Training system

4) **Pipeline Superintendent Responsibilities & Training Procedures**

**PIPELINE SUPERINTENDENT**

- a) Read and review the facility response manual and make appropriate changes so plan is effective.
- b) Understand response requirement - time, money, personnel, and equipment.
- c) Receive emergency response management training.
- d) Maintain liaison with Area Contingency Plan Committee.
- e) Schedule training programs.
- f) Schedule required drills.
- g) Assure that all events required to be documented are documented.
- h) Arrange from off-site area or areas for spill response command and communications, medical treatment, evacuation regrouping, and other emergency needs.
- i) Coordinate with outside medical, health, and emergency response agencies.
- j) Have responsibility to see that facility personnel use decontamination procedures.
- k) Be responsible for safety training.
- l) Be responsible for documentation of health and safety personnel occurrences.
- m) Advise outside responders coming on site of the risks and hazards.
- n) Maintain a thorough knowledge of the emergency response procedures.
- o) Review personnel performance in meeting the requirement of the emergency response training program.

15. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

(a) **General.** Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

WPC did not establish adequate written emergency procedures to verify that the supervisors be maintained a thorough knowledge of that portion of the emergency response procedures for which they are responsible. Each operator shall require and verify that supervisors maintain a thorough knowledge of the emergency response procedures for which they are responsible as required by §195.403(c). WPC's emergency procedure is inadequate because they did not clearly describe what actions must be taken to meet the requirement of §195.403(c).

**SECTION 6**  
**TRAINING & EQUIPMENT TESTING PROCEDURES**  
**WYOMING PIPELINE COMPANY (WPC)**  
**Crude Pipeline Oil Spill Response Plan**

5) **Operations Personnel Responsibilities & Training Procedures**

**PIPELINE CONTROLLERS**

- a) Perform tabletop drills with Manager or Operations Foreman, semi-annually if possible but at least annually.
- b) On job training (OJT) is using qualified Controller, with new or relief Controller. This is done when training and to refresh relief Controller before relief assignments.
- c) Attend Operations/Safety Meetings with all personnel. Coordinating discussions are reviewed at this time.
- d) Attend fire and emergency meetings annually.
- e) Attend a fire drill annually.
- f) Attend an annual breathing apparatus drill.
- g) Complete all required modules in the Computer Based Training system

6) **Maintenance Personnel Responsibilities & Training Procedures**

**PIPELINE EQUIPMENT OPERATORS**

- a) Perform an equipment deployment drill and inventory annually. This may be announced or unannounced.
- b) Receive OJT on all pipeline leak response equipment supervised by the Maintenance Foreman.
- c) Receive OJT on pipeline operations from Pipeline Controllers or the Operations Foreman on a routine basis.
- d) Attend fire and emergency meeting held annually.
- e) Attend an annual fire drill.
- f) Attend a self-contained breathing apparatus drills are performed annually.
- g) Attend Operations/Safety Meeting monthly.
- h) Complete all required modules in the Computer Based Training system

7) **Qualified Individual's Responsibilities & Training Procedures**

- a) Read and review the Spill Response Plan and make appropriate changes so plan is effective. (All)
- b) Understand response requirements and equipment. (All)
- c) Teach assigned subjects to operators and maintenance personnel. (All)
- d) Maintain liaison with Response Contractors. (Maintenance Foreman)
- e) Update Response Manuals. (Operations Foreman)
- f) Ensure all response equipment, fire response equipment and firefighting equipment is operating and properly maintained. (Maintenance Foreman)
- g) Complete all required modules in the Computer Based Training system

8) **Pipeline Superintendent Responsibilities & Training Procedures**

**PIPELINE SUPERINTENDENT**

- a) Read and review the facility response manual and make appropriate changes so plan is effective.
- b) Understand response requirement - time, money, personnel, and equipment.
- c) Receive emergency response management training.
- d) Maintain liaison with Area Contingency Plan Committee.
- e) Schedule training programs.
- f) Schedule required drills.
- g) Assure that all events required to be documented are documented.
- h) Arrange from off-site area or areas for spill response command and communications, medical treatment, evacuation regrouping, and other emergency needs.
- i) Coordinate with outside medical, health, and emergency response agencies.
- j) Have responsibility to see that facility personnel use decontamination procedures.
- k) Be responsible for safety training.
- l) Be responsible for documentation of health and safety personnel occurrences.
- m) Advise outside responders coming on site of the risks and hazards.
- n) Maintain a thorough knowledge of the emergency response procedures.
- o) Review personnel performance in meeting the requirement of the emergency response training program.