Dixie Pipeline
COMPANY

November 10, 2010

Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
233 Peachtree St., Suite 600
Atlanta, GA 30303

Attn.: Mr. Wayne T. Lemoi
Director, Southern Region

Re: CPF No. 2-2010-5003M
Dixie Pipeline Company (Dixie)
Response - Notice of Amendment (NOA) dated March 22, 2010

Dear Mr. Lemoi,

This letter concerns the Pipeline and Hazardous Materials Safety Administration's (PHMSA) follow up letter dated July 13, 2010 in response to Dixie's reply dated May 3, 2010 regarding the above-referenced NOA. After discussions with Mr. Schwarzkopf from the PHMSA Southern Region and key Emergency Response professionals, Dixie has developed the attached which should satisfy the recommendations as outlined in the original NOA.

If you have any comments or questions, please contact us at your convenience.

Sincerely,

Jim Collingsworth
President, Dixie Pipeline Company

Attachment

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P.O. Box 4324
Houston, Texas 77210-4324
713.381.6500

1100 Louisiana Street
Houston, Texas 77002-5227
www.epplp.com

Dixie Proposed changes

Highlighted in yellow indicates all the proposed modifications to the Emergency Response language.

3.5 Emergency Response Actions
3.5.3.4 Control Zones

3.5.3.4 Control Zones

The control zones will be set by the Incident Commander (IC) and the Safety Officer (SO). In determination of control zones, the SO shall ensure a buddy system is used and maintained at all times, with appropriate back-up. When determining control zones for releases or spills, appropriate atmospheric monitoring devices and methods will be utilized as described in section 3.5.3.8. Air modeling is a tool that may be used, when determined within the Unified Command Structure by the Incident Commander and Safety Officer to be appropriate. If used, the air modeling will be performed by a local responding agency or a Hazmat contractor.

Personnel evaluating the site must don appropriate PPE until concentrations of contaminates and hazards have been fully evaluated. An Emergency Response Site Safety and Action Plan (**EPCO form SF-49**) shall be completed and communicated to personnel prior to taking any action.

- **Exclusion Zone (Hot Zone)** – The area immediately around a spill or release where contamination does or could occur. The innermost of the three zones of a hazardous substance/material incident. Special protection is required for all personnel while in this zone. Areas with identified levels (any reading on the atmospheric monitor beyond normal) of LEL, Toxic gases, oxygen enriched, or oxygen deficiency will be included as a part of the Exclusion Zone (Hot Zone).
- **Contamination Reduction Zone (Warm Zone)** – The area between the Exclusion Zone and the Support Zone. This zone contains the personnel decontamination station. This zone may require a lesser degree of personnel protection than the Exclusion Zone. This separates the contaminated area from the clean area and acts as a buffer to reduce contamination of the "clean" area.
- **Support Zone (Cold Zone)** – The "clean" area outside of the contamination control line. In this area, equipment and personnel are not expected to become contaminated. Special protective clothing is not required. This is the area where resources are assembled to support the hazardous substances/materials release operations.

Every effort should be made with the resources available to restrict entry of anyone into the Controlled Zones other than emergency responders authorized

by the IC. Entry into and from the Contamination Reduction Zone or Exclusion Zone shall be documented and shall occur by designated routes.

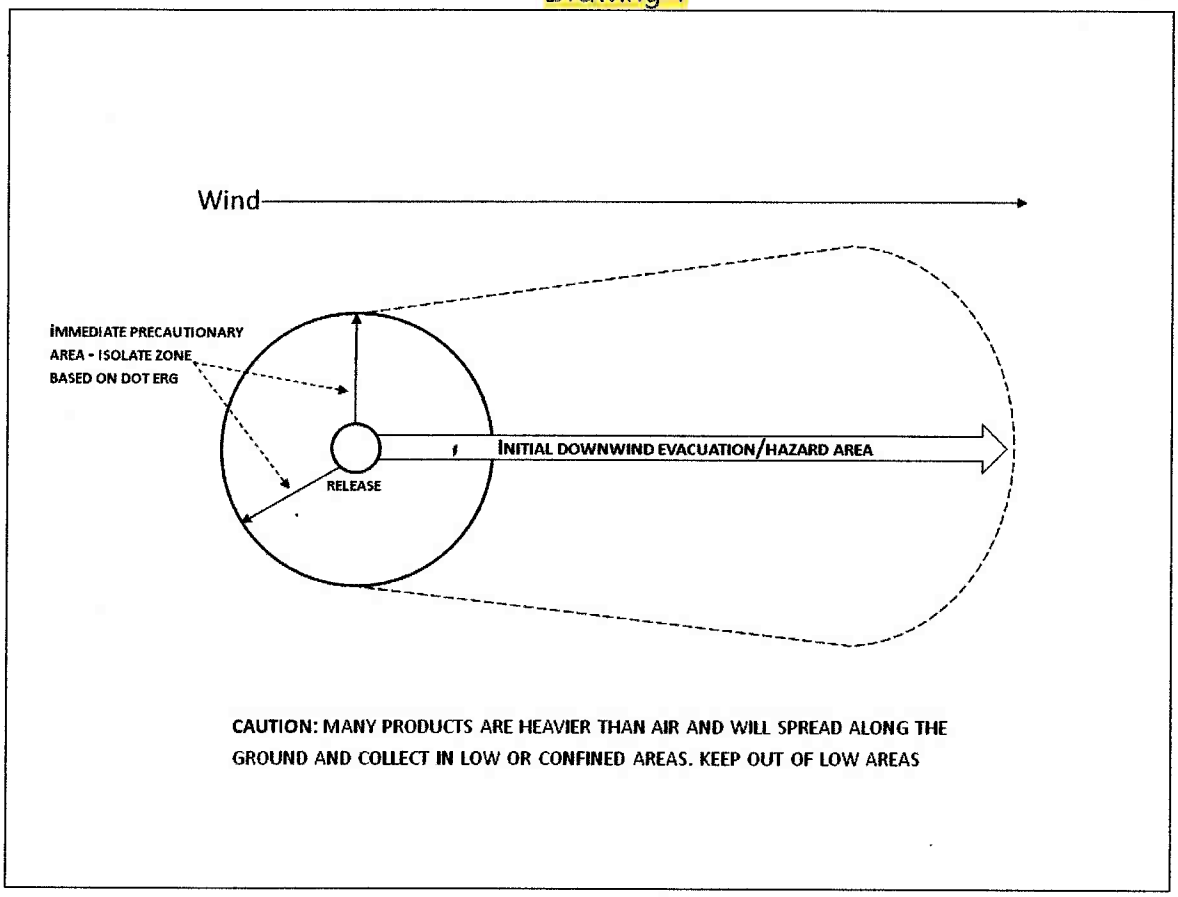
3.5 Emergency Response Actions
3.5.3.8 Atmospheric Monitoring Devices

3.5.3.8 Atmospheric Monitoring Devices

The SO will ensure that proper atmospheric monitoring devices for such gases as Oxygen, Combustible Gases, and Toxic Gases are used during the emergency response and remediation to evaluate atmospheric conditions.

1. **Preparation for Atmospheric Monitoring**
    a. Atmospheric monitoring devices will have current calibrations and bump test in accordance to manufacture's recommendations.
    b. The user will be trained in the operation of the atmospheric monitoring device.
    c. Manufactures recommendations for the operation of atmospheric monitoring devices shall be followed.
    d. Start the instrument in an area known to be a good atmosphere and free of hydrocarbons. The instrument shall be "zeroed" (if needed) in this area in accordance to manufacture's recommendations.
2. **Atmospheric Monitoring of Hazardous Area**
    a. **Follow preparation provided in Section 3.5.3.8 (1)** of this plan.
    b. **Emergency Response Guidebook (ERG)** as a resource.
        i. Utilize the Department of Transportation Emergency Response Guidebook (ERG), as appropriate, to supplement known information during the initial response phase in determining the initial area to be monitored.
        ii. Pipeline Transportation is referenced in the "White Pages" section (page 24-25) and provides direction in pipeline incidents.

Drawing 1



c. Incident approach and scene atmospheric monitoring

i. Initial approach should be always be with caution, and whenever possible or feasible from the direction:
   - Upwind or crosswind of the spill or release area
   - Uphill of the spill or release area.

ii. Constantly be aware of any indications of a pipeline failure or release:
   - Visible Clues: such as fire, gas cloud, blowing gas, blowing dirt, pooling or 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
   - Other unusual indications of hazardous materials present
     - Defoliation
     - Biological indications

iii. In the event any indication is present to confirm there is a release, begin to monitor for hazardous atmospheres or imminently dangerous conditions.

iv. In the event there are no indications of a release, consider the following conditions to begin sampling for hazardous conditions:

- Hazards
  - Product characteristics
  - Magnitude of spill or release
  - Duration of spill or release
  - Time, weather and location of release
  - Wind direction and speed
  - Terrain
    - Culverts
    - Low areas
    - Below grade
  - DOT ERG Immediate Precautionary measures
- Additional distance should be considered:
  - When approach must be made from downwind
  - When there are low or no winds
  - In larger volume releases
  - The longer in time that the leak or release has been occurring consider monitoring further downwind
  - DOT ERG Large Spill Evacuation Distances for product

v. The **DO NOT**'s of atmospheric monitoring:

- DO NOT ever enter, walk into, or drive into a vapor cloud or puddle of liquid
- DO NOT initiate gas detection in an enclosed area
- DO NOT initiate gas detection in an area where there is an odor
- DO NOT park over a manhole or storm drain
- DO NOT approach the scene with any ignition source until the Hot Zone has been established (e.g. cell phone, camera, vehicle, other)

d. Determination of Hazardous Area

i. Guidelines for determining the Hazardous Area

- Larger releases or spills and longer time durations will increase the hazardous area
- Heavier than air products will follow the slope of the terrain to the lowest area, as affected by wind speed and direction.
- Increased wind speeds may increase the Hazardous Area.
- The Hazardous Area will change (grow/reduce, move) depending on duration of the leak, wind direction and speed, terrain, as well as other factors.
- Refer to Section 3.5.3.8 Drawing 1 as an aid.

ii. Observe the atmospheric monitoring devices' readings while slowly approaching, with caution, the suspected hazardous area from the direction described in section 3.5.3.8 (2)(c) above.

iii. When the atmospheric monitoring device displays a detectable reading, back-up approximately 10' and identify that location as one point on the perimeter of the "Exclusion Zone (Hot Zone)" Detectable readings are:

   a. Oxygen Sensor – Any deviation of the monitor reading from the normal reading for that instrument (20.9 or 20.8)

   b. LEL Sensor – Any monitor reading above 0 LEL

   c. Toxic Sensor – Any monitor reading above 0 ppm

iv. Proceed with caution in a clockwise, or counter-clockwise, fashion around the suspected perimeter of the Hazardous Area. Repeat the above steps until a reading is obtained that provides the next known point on the perimeter of the Hazardous Area. Identify each location as a point on the perimeter of the "Exclusion Zone (Hot Zone)"

v. Continue with caution around the suspected Hazardous Area until the circumference of the Hazardous Area is identified by receiving readings on the atmospheric monitoring device.

vi. Once the perimeter of the "Exclusion Zone (Hot Zone)" has been determined, it must be continuously monitored from the "Contamination Reduction Zone (Warm Zone)" to identify any changes.

vii. A log will be maintained to record area atmospheric monitoring.

viii. The points identified using the atmospheric monitoring device will be utilized to assist in representing the "Exclusion Zone (Hot Zone)" on a map of the area.

6.0 Incident Types

6.4 Large Product Release or Spill

6.4 (2) Activate the appropriate facility alarm system to initiate evacuation. Utilize the Department of Transportation Emergency Response Guidebook (ERG), as appropriate, to supplement known information during the initial response phase in determining the initial evacuation area.

6.4 (9) Attempt to identify the source, magnitude and duration of release or spill and material type from a safe distance.

6.4 (10) Determine the wind direction and speed as well as the slope of the terrain.

6.4 (14) Establish Control Zones using monitoring devices as described in section 3.5.3.4