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Delek Logistics Partners, LP
12700 Park Central Drive
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Dallas, TX 75251

VIA EMAIL (MARY.MCDANIEL@DOT.GOV) AND CERTIFIED MAIL

July 31, 2019

Ms. Mary McDaniel
Director
Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration (PHMSA)
8701 S Gessner Rd, Suite 630
Houston, Texas 77074

RE: CPF No. 4-2019-5011M, Notice of Amendment

Dear Director McDaniel,

Delek Logistics is writing in response to the referenced Notice of Amendment dated July 2, 2019, stemming from PHMSA's December 5, 2017 through March 26, 2018 pipeline safety inspection of Delek's crude oil pipelines and facilities in Arkansas and Louisiana. Specifically, the following responses are to four procedural amendment requests identified in the Notice.

For reference, the amendment requests of the Notice are listed individually below and followed by Delek's responses.

1. *With respect to the violation of § 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:

   (2) Gathering of data needed for reporting accidents under subpart B of this part in a timely and effective manner.

   Delek's procedure for "Immediate Notice of Certain Accidents" was found to be inadequate. The procedure failed to state that immediate notice of events described in 195.52(a) will be made no later than one hour after confirmed discovery.

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Also, Delek procedure did not state that within 48 hours after the confirmed discovery of an accident, to the extent practicable, an operator must revise or confirm its initial telephonic notice as required by 195.52(d).
Delek's O & M manual LTP-OP-070.01 (Revision date: March 30. 2016), Sections 6.2 and 6.3.7 states:
"Telephonic notices of an accident by the operator are required at the earliest possible moment within (2) hours after discovery of a release of a hazardous liquid in any of the events described below. Notice is required for any of the following failures."

"At the earliest practicable moment an additional telephonic report to NRC should be made if significant new information becomes available during the emergency response phase of an event."

Delek must amend Sections 6.2 and 6.3.7 of their O & M manual LTP-OP-070.00 to address the requirements of 195.52 (a) and (d).

Delek has revised its O & M procedures. In the revised procedure 11.2.4.1 A. now states that immediate notification shall be made "at the earliest practicable moment following discovery of a release of hazardous liquid or carbon dioxide transported resulting in an event described in 195.50, but not later than one hour after confirmed discovery, Delek Logistics must give notice."
Also, in 11.2.4.1 B each notice required by paragraph (A) of this section must be revised within 48 hours of discovery. Excerpts of the revised procedures are enclosed in Attachment 5011-1

2. *195.452 Pipeline Integrity management in high consequence areas.*

(h)(1) General requirements. An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remedial plan failed to include the requirement to notify PHMSA when a pressure reduction exceeds those that could reduce a pipeline's integrity. An operator must comply with 195.422 when making a repair.

(ii)Long-term pressure reduction. When a pressure reduction exceeds 365 days, the operator must notify PHMSA in accordance with paragraph (m) of this section and explain the reasons for the delay. An operator must also take further remedial action to ensure the safety of the pipeline.

Delek's written Integrity Management procedure for "Notification to OPS" was found to be inadequate. The Integrity Management plan failed include the requirement to notify PHMSA when a pressure reduction exceeds 365 days as required by 195.452(b)(1)(ii).to the OPS will be submitted for the following reasons:

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- *Intent to use technology other than ILI or hydrotesting to perform an assessment*
- *Inability to meet required remediation schedule*
- *Re-assessment interval to exceed 5 years."*

Delek must amend the procedure contained in Section 6.7 of its Integrity Management plan, to include the requirement to notify PHMSA when a pressure reduction exceeds 365 days.

Delek has revised its procedures to identify the requirement to notify PHMSA of long term pressure de-rates exceeding 365 days. The procedural modification are identified in the enclosed Attachment 5011-2 In Delek O & M Manual, Section 12.8-Pressure Reductions beyond 365 Days in an HCA

3. *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.

Delek's O&M procedure LTP-OP-117.00 "Repair Criteria Outside 195.452 Regulated Areas" was found to be inadequate. The O & M procedure did not state what repair method would be applied to address anomalous conditions discovered through integrity assessment or information analysis.

Delek's process did not identify any acceptable method that reliable engineering test and analyses show can permanently restore the serviceability of the pipe, both in HCA and non-HCA areas. Under 195.452 (h)(1), an operator must be able to demonstrate that the remediation of the condition will ensure that the condition is unlikely to pose a threat to the long-term integrity of the pipeline. Also, 195.585(a)(2) requires a process to repair the pipe by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe.

Delek must amend Section 6.0 of its O & M procedure (LTP-OP-117.00), to include list of identified acceptable repair methods that are appropriate for each type of defect, both in HCA and non-HCA regulated areas.

Delek has revised its procedures to identify acceptable repair methodologies to its pipelines. Acceptable repair types are identified in Section 13.1.4.1.9 of Delek's Hazardous Liquids Operations & Maintenance Manual. Please refer to the enclosed Attachment 5011-3.

4. *195.403 Emergency Response training.*
   (a) Each operator shall establish and conduct a continuing training program to instruct emergency response personnel to:
   (1) Carry out the emergency procedures established under 195.402 that relate to their assignments;

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(2) Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions;

(3) Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action;

(4) Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and

(5) Learn the potential causes, types, sizes, and consequences of fire and the appropriate use portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.

(b) At the intervals not exceeding 15 months, but at least once each calendar year, each operator shall; knowledge of liquids being transported and hazardous conditions these liquids could cause, recognizing conditions that could cause

Delek failed to establish an adequate procedure for conducting a continuing training program to instruct their emergency response personnel on how to carry out the emergency procedures established under 195.402 that relates to their assignments.

Delek's O & M manual LTP-OP-113, Section 6.0 (Issue date: February 11, 2015 states:

".. the program addresses operation, maintenance, and emergency procedures, knowledge of liquids being transported and hazardous conditions these liquids could cause, recognizing conditions that could cause emergencies or malfunctions and corrective actions needed in cases of malfunctions of any kind along the pipeline..."

The procedure stated in Section 6.0 of Delek's personnel training manual, LTP-OP 113 lacks specificity on how emergency response personnel are being trained to carry out the emergency response procedures that relate to their assignments. Delek must amend its procedure to include a detailed process for training emergency response personnel to carry out the emergency response procedures that relate to their assignments.

Delek has revised its Emergency Response Training procedures to clarify the appropriate training objectives. Please refer to Attachment 5011-4 11.9 Emergency Response Training

Delek Logistics remains committed to working cooperatively with your office with the ultimate goal of further enhancing the safety of our operations. Please feel free to contact me directly, or Michael Sanders (630-649-8016), should you have any questions pertaining to this matter.

Sincerely,

DocuSigned by:
Michael Odigie
F084ED2B05E2415...

Michael Odigie
VP Asset Integrity and Reliability

White, Sheila CTR (PHMSA)

From: McDaniel, Mary (PHMSA)
Sent: Monday, August 5, 2019 9:42 AM
To: White, Sheila CTR (PHMSA)
Cc: Eke, Malachy (PHMSA)
Subject: FW: Delek Logistics Response to CPF No. 4-2019-5011 Notice of Amendment
Attachments: PHMSA 2019 NOA 5011-1 SEC 11.0 R1 MICHAEL S REV..pdf; 5011-2 Sec 12.pdf; 5011-3.pdf; 5011-4 Emergency Response Training.pdf; Response_to_CPF_4-2019-5011 (1).pdf

For the Case file

From: Candace Norris [mailto:Candace.Norris@delekus.com]
Sent: Thursday, August 1, 2019 2:51 PM
To: McDaniel, Mary (PHMSA) <mary.mcdaniel@dot.gov>; PHMSA Pipelinesafety <PHMSA.Pipelinesafety@dot.gov>
Cc: Roy Johnston <Roy.Johnston@delekus.com>; Jodie Mitchell <Jodie.Mitchell@deleklogistics.com>; Michael Sanders <Michael.Sanders@deleklogistics.com>; candace.rose@me.com
Subject: Delek Logistics Response to CPF No. 4-2019-5011 Notice of Amendment

Dear Mary McDaniel PHMSA,

Please find attached Delek's response to the above mentioned Notice of Amendment CPF No. 4-2019-5011M. Also, you will note the attachment compliances for Items #2, 3, 4.

Regards,

Candace Norris
Delek Logistics Partners, LP
Regulatory Compliance Coordinator
Big Spring, TX 79720
Email: candace.norris@delekus.com

D. Cleaned up promptly;

3. Death of any person;
4. Personal injury necessitating hospitalization;
5. Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000.

- Confirmed Discovery – When it can be reasonably determined, based on information available to the operator at the time a reportable event has occurred, even if only based on a preliminary evaluation.
- Control Room – for the sake of this procedure, synonymous with Control Center – An office that directs pipeline operations remotely, via a SCADA system, that meets the requirements for Control Room Management.
- Emergency – is defined as an unforeseen event which calls for immediate action, that:
  1. Is immediately threatening to life, health, property or environment.
  2. Has a high probability of escalating to cause immediate danger to life, health, property or environment.
- Emergency Response – A response effort by personnel or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an event which results, or is likely to result, in an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances where the substance can be controlled at the time of release by personnel are not considered to be emergency responses. Responses to releases of hazardous substances where there is no potential safety, health, property, and/or environmental hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses.
  - NRC - National Response Center
  - Operator - A person who owns or operates pipeline facilities.
  - OPID Number - Operator Identification Number assigned to Delek Logistics by PHMSA.
- Pipeline – All parts of those physical facilities through which hydrocarbons move in transportation, including but not limited to, pipe, valves, and other appurtenances attached to the pipe, compressor units, pumping units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.
- Pipeline Controller or Controller – Personnel working in a Control Center that meets the requirements for Control Room Management.

11.2.4 POLICY

11.2.4.1 Notifications Required for Accidents

1. Immediate Notice of Certain Accidents

A. Notice Requirements. At the earliest practicable moment following discovery, of a release of the hazardous liquid or carbon dioxide transported resulting in an event described in §195.50, but no later than one hour after confirmed discovery, Delek Logistics must give notice, in accordance with paragraph (b) of this section of any failure that:

- Caused a death or a personal injury requiring hospitalization;

- Resulted in either a fire or explosion not intentionally set by Delek Logistics;
- Caused estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of Delek Logistics or others, or both, exceeding $50,000;
- Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines; or
- In the judgment of Delek Logistics, was significant even though it did not meet the criteria of any other paragraph of this section.

B. Information Required. Each notice required by paragraph (a) of this section must be made to the National Response Center either by telephone to 800-424-8802 (in Washington, DC, 202-267-2675) or electronically at http://www.nrc.uscg.mil and must include the following information:

- Name, address and identification number of Delek Logistics.
- Name and telephone number of the reporter.
- The location of the failure.
- The time of the failure.
- The fatalities and personal injuries, if any.
- Initial estimate of amount of product released in accordance with paragraph (3) of this section.
- All other significant facts known by Delek Logistics personnel that are relevant to the cause of the failure or extent of the damages.

C. Calculation. Delek Logistics will have a written procedure to calculate and provide a reasonable initial estimate of the amount of released product.

D. New Information. Within 48 hours after the confirmed discovery of an accident, to the extent practicable, Delek Logistics must revise or confirm our initial telephonic notice with a revised estimate of the amount of product released, location of the failure, time of the failure, a revised estimate of the number of fatalities and injuries, and all other significant facts that are known by Delek Logistics, that are relevant to the cause of the accident or extent of the damages. If there are no changes or revisions to the initial report, Delek Logistics personnel must confirm the estimates in the initial report. To update a report the previous NRC report number must be referenced. The NRC will accept additional reports but will not update a previous report.

2. Accident Reports

A. If Delek Logistics experiences an accident that is required to be reported under §195.50 must, as soon as practicable, but not later than 30 days after discovery of the accident, Delek Logistics Regulatory Compliance personnel will file an accident report on DOT Form 7000-1.

B. Whenever Delek Logistics staff receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days.

12.4 - Variance Request from Five-Year Assessment Interval for Engineering Reasons

If the Director of Asset Integrity determines that a variance from the required five-year assessment is warranted for engineering reasons, the Director of Asset Integrity will submit such request to the address specified in §195.452(m) at least 270 days prior to the end of the five-year interval. Information required in the submittal is date and method of last assessment, proposed new retest interval, actions that will provide equivalent understanding of pipe condition, and summary of engineering basis.

12.5 - Variance Request from Five-Year Assessment Interval Because Of Unavailable Technology

If the Director of Asset Integrity determines that a variance from the required five-year assessment is warranted because of unavailable technology, the General Manager will submit such request to the address specified in §195.452(m) at least 180 days prior to the end of the five-year interval. Information required in the submittal is date and method of last assessment, reason why required interval cannot be met, interim evaluation of pipe integrity, and schedule for assessment.

12.6 - Notification of Extension of Remediation Response Schedule

The Integrity Engineer must notify PHMSA or other appropriate regulatory authority if an extension of a remediation response schedule will occur in a HCA if cannot meet original schedule and cannot provide a temporary reduction in operating pressure. The deadline is when Delek determines schedules cannot be met. Include if the notification description of defects/repairs needed, reason for delay, why pressure can't be reduced, basis for concluding delay won't jeopardize health or environment, schedule for repair, other mitigative actions planned.

12.7 - Use of "Other" Technology

The Director of Asset Integrity must notify PHMSA or other appropriate regulatory authority about the use of "other" technology before conducting the assessment. The other technology must be demonstrated to provide an equivalent understanding of the condition of the pipe as if using one of the three (3) primary assessment methods. The deadline is 90 days prior to assessment. Information required in the submittal is description of "other technology", basis for concluding equivalent understanding of pipe condition, schedule for assessment.

12.8 - Pressure Reductions beyond 365 Days in an HCA

The Director of Asset Integrity must notify PHMSA or other appropriate regulatory authority if a reduction in operating pressure in a HCA exceeds 365 days. Gather and evaluate information for the notification, determine what repairs are required to be made under the IMP, develop notification information and include reasons for the remediation delay and justification that the continued pressure reduction will not jeopardize the integrity of the pipeline.

13.0 PIPELINE REPAIR

13.1 Requirements for Repair to Pipelines and Pipeline Appurtenances

13.1.1 SCOPE AND PURPOSE

This procedure outlines the requirements for conducting general repairs on the pipeline and associated components.

NOTE: Contact the Control Center and Scheduling to advise of the repair, duration, and if the repair may affect line pressure, or cause outages.

CAUTION: Implement the Delek Logistics Emergency Response Plan if this has not already been done and a potential emergency exists.

CAUTION: Individuals need to be aware of the potential of discovering a safety-related condition during this activity. If there is suspicion that a safety-related condition exists, refer to Section 3.4 for determination and reporting information.

13.1.2 DEFINITIONS

Line Section – a continuous run of pipe between:

- Adjacent pressure pump stations;
- A pressure pump station and terminal or breakout tanks
- A pressure pump station and a block valve; or
- Adjacent block valves.

13.1.3 POLICY

13.1.3.1 Pipeline Repairs

1. All Delek Logistics personnel, in repairing a pipeline system, must ensure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.
2. Delek Logistics may only use pipe, valves, or fittings for replacement in repairing pipeline facilities that has been designed and constructed as required by Section 4.0, Pipeline Design; Section 6.0, Pipeline Construction; and Section 7.0, Pressure Testing.
3. Operations Area Supervision with support from Safety, Integrity Management, Technical Services, and Regulatory Compliance, shall consider each situation requiring repairs to the pipeline and prescribe the general extent and methods of repairs to be made. This decision will be based on the information and circumstances as reported by the field personnel in conjunction with existing operating conditions.
4. Operations Area Supervision is responsible for preparing a written Job Plan in accordance with Environmental, Health & Safety Manual - Section 3.13, Job Planning Process.

13.1.4 PROCEDURE

13.1.4.1 General Pipeline Repair

1. All repairs to the pipeline system, including breakout tanks, will be made in a manner that is safe and will prevent injury to persons or damage to property.

2. Delek Logistics Operations with support from Technical Services, Integrity, and EHS&R will determine the type of repair acceptable for the type of imperfection or damage found.
3. Response planning for repair shall include:
   A. Implementing the Environmental, Health & Safety Manual - Section 3.13, Job Planning Process.
   B. Gathering necessary equipment for both immediate response to condition and needed to affect the repair.
   C. Appropriate materials for the repair.
   D. Trained personnel aware of and qualified in the repair method to be used and the hazards to public and personnel safety.
   E. Notification to Delek Logistics OCC and Scheduling of existence of condition to be repaired and timing of the repair and potential effects on operations.
4. All pipe that is to be used for repair must be marked showing the pipe grade, wall thickness, seam type, test pressure and the manufacturer or it must be identifiable with inventory records that show that information. All installed pipe must be coated and cathodically protected in accordance with Section 14.0, Corrosion Control, and the Corrosion Control Manual.
5. No valve, pipe or fitting shall be used for repair or replacement in the pipeline facilities, unless it is designed, constructed and tested as required in Section 4.0, Pipeline Design; Section 6.0, Pipeline Construction; and Section 7.0, Pressure Testing.
6. The pretested pipe used as replacement pipe in repairs made to a pipeline system must have been hydrostatically tested with water in accordance with Section 7.0 or tested after installed with the entire line section.
7. All repairs to the pipeline system that involve replacement of any line pipe, valves, flanges, fittings, or other pipeline components will be constructed to allow passage of internal inspection devices for each line section. (See Section 4.1).
8. Temporary repairs made necessary to protect the public and for operating purposes, shall be made in a safe manner. Such temporary repairs shall be made permanent or replaced in a permanent manner as soon as practical
9. Repairs to existing lines shall be made in accordance with ASME/ANSI B31.4 (See Company and Industry References for applicable edition incorporated by reference). Approved permanent pipeline repairs types are listed in Table 451.6.2(b)-1 and Table 451.6.2(b)-2.
   A. Installation of pre-tested pipe requires nondestructive testing of 100% of the welds. (See Section 5.4).
   B. Pipeline sections that have been relocated will be hydrostatically tested in accordance with Section 7.0, except for pipeline sections as addressed under Section B for pipeline movement.
   C. For each repair to pipe or relocation of the pipeline system, Appendix 13.1, Pipeline Maintenance Report, shall be filled out and retained for the useful life of the system. For each repair to parts of the pipeline system other than pipe, Appendix 13.1 and other repair specific records will be completed and retained for at least 1 year. These records shall include the following:
      - Date, location, and description of each repair or relocation of the pipeline or pipeline appurtenances

11.9 Training

11.9.1 SCOPE AND PURPOSE

This procedure establishes requirements for a continuing education and training program for emergency response personnel

11.9.2 DEFINITIONS

None

11.9.3 POLICY

11.9.3.1 Emergency Training

1. Delek Logistics shall establish and conduct a continuing training program to instruct emergency response personnel to:
   A. Carry out the emergency procedures established under 195.402 that relate to their assignments;
   B. Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions;
   C. Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action;
   D. Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and
   E. Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.
2. At the intervals not exceeding 15 months, but at least once each calendar year, each operator shall:
   A. Review with personnel their performance in meeting the objectives of the emergency response training program set forth in paragraph (a) of this section; and
   B. Make appropriate changes to the emergency response training program as necessary to ensure that it is effective.
3. Each operator shall require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under this manual for which they are responsible to ensure compliance.

11.9.4 PROCEDURE

11.9.4.1 Emergency Training and Review

1. Emergency Training
   A. Delek Logistics Company utilizes local area specific Emergency Response Plans.

B. These plans provide additional guidance and details regarding emergency response activities specific to the operating area.

C. Delek Logistics Emergency Response Training Program is designed to provide appropriate employees with specific course material relative to the Emergency Response activity.

D. For Operations and Maintenance personnel, the course material addresses the characteristics of hazardous liquids and gases: i.e. flammability, toxicity, odorless vapors, auto refrigeration, asphyxia, and explosive capabilities.

E. Course material also presents information designed to train the employee on recognition and response to emergencies, potential results of malfunctioning equipment, and the appropriate response to such an occurrence.

F. Emergency Response courses may be offered as web-based training, on-the job training, instructor led classroom training or other methods that are deemed appropriate.

G. The Company utilizes an Emergency Response Training Program for the Control Room Operators. This training will provide the knowledge and guidance to react and respond to the following:

- Initiate shut down or pressure reduction process, as required.
- Initiate attempts to secure the facility and "make safe".
- Communication Notifications, both internal and external, as required.
- Maintain surveillance of facility by remote cameras, if available.

H. Operations and Maintenance personnel that may be required to react to an emergency situation are provided the appropriate level of Emergency Response training.

I. The Company's Emergency Response training program is designed to instruct pipeline operating and maintenance personnel to:

- Carry out the emergency procedures established under the Liquids Pipeline O&M Manual and the Company Safety Policies Manual that relate to their assignments;
- Know the characteristics and hazards of the hazardous liquids transported, including, in the case of flammable highly volatile liquids, flammability of mixtures with air, odorless vapors, and water reactions
- Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquid spills, and to 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;
- Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.

J. Delek Logistics provides emergency response training utilizing internally approved instructors and/or approved third party emergency response training instructors/schools.

K. Proper use of fire emergency response procedures and equipment is presented in addition to procedures and methods for controlling accidental releases, minimizing the potential for fire or explosion, and limiting personnel exposure to any toxic materials.

L. Students also address the types and sizes of product releases or fires that could occur, fire chemistry, potential causes and what equipment should be used to mitigate a release or extinguish a fire on Company facilities. Trainees may be presented with simulated conditions of actual pipeline emergencies to which they must effectively respond.

M. Appropriate company employees and designated contractors are instructed to recognize safety related conditions that may occur in the operation of the pipeline systems, conditions that could potentially turn into a safety related condition and the corrective action that should be taken in the event of a safety related condition. Employees will report to their respective supervisors immediately in the event a safety related condition occurs.

N. In addition, Delek Logistics will verify that its supervisors maintain a thorough knowledge of that portion of the established emergency response procedures for which they are responsible to ensure compliance. This may include all or part of the following:

- Receiving, identifying, and classifying notices of events which need immediate response by the operator or notice to fire, police, or other appropriate public officials and communicating this information to appropriate operator personnel for corrective action.
- Prompt and effective response to a notice of each type emergency, including fire or explosion occurring near or directly involving a pipeline facility, accidental release of hazardous liquid from a pipeline facility, operational failure causing a hazardous condition, and natural disaster affecting pipeline facilities.
- Having personnel, equipment, instruments, tools, and material available as needed at the scene of an emergency.
- Taking necessary action, such as emergency shutdown or pressure reduction, to minimize the volume of hazardous liquid that is released from any section of a pipeline system in the event of a failure.
- Control of released hazardous liquid at an accident scene to minimize the hazards, including possible intentional ignition in the cases of flammable highly volatile liquid.
- Minimization of public exposure to injury and probability of accidental ignition by assisting with evacuation of residents and assisting with halting traffic on roads and railroads in the affected area or taking other appropriate action.
- Notifying fire, police, and other appropriate public officials of hazardous liquid pipeline emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving a pipeline system transporting a highly volatile liquid.

- In the case of failure of a pipeline system transporting a highly volatile liquid, use of appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas.
- Providing for a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found. (See Section 11.8.)

2. Emergency Training Review
   A. A review with personnel is conducted at least once each calendar year, not to exceed 15 months, on their performance in meeting the objectives of the emergency response training program.
   B. This review is documented in Appendix 11.2 and retained by Local Area Operations.

11.9.5 DOCUMENTATION

1. Operations and/or Safety will maintain all records necessary to document the emergency condition.
2. Safety and/or the location supervisor will retain any available records that may be used to reconstruct the sequence of events surrounding an emergency condition as defined in the section.

11.9.6 OQ COVERED TASKS

This is an administrative task and not covered under Operator Qualification.

11.9.7 REGULATORY REFERENCES

1. 49 CFR 195.402(e) – Procedure Manual for Operations, Maintenance and Emergencies
2. 49 CFR 195.403 – Emergency Response Training

11.9.8 COMPANY AND INDUSTRY REFERENCES

OM-ADM-195 Hazardous Liquids O&M Manual:

A. Section 3.4 – Safety Related Conditions
B. Section 11.8 – Providing a Post Accident Review of Employee Activities
C. Appendix 11.2 – Emergency Training