



## EMERGENCY PREPAREDNESS AND RESPONSE

The basic concept of the Emergency Response Plan is to minimize the spread of a release or the consequences of an emergency and mitigate its effects. This is best accomplished by securing the source of the release or emergency, containing a spill as close to the source as possible, protecting people, threatened environmentally sensitive and economically important areas, and removing the spilled material as quickly as possible.

An Emergency Response Plan (ERP) provides guidance on the immediate procedures and notifications which should be followed in an emergency situation, such as a fire, explosion, injury, or release of chemicals, hazardous substances, hazardous wastes, crude oil, refined petroleum products, or gases. These plans also cover other emergencies such as terrorism, civil disturbances, severe weather, tropical storms, tornadoes, hurricanes, dust storms, floods and earthquakes. A plan has been prepared for Torrance Logistics Company (TLC) in response to requirements of the Oil Pollution Act of 1990 (OPA 90) and other emergency planning requirements that are applicable to TLC's operations. The focus of a plan is on TLC's operations, consisting of pipeline transportation and breakout storage of petroleum and petroleum products. A plan provides guidance for responding to various emergencies and releases or spills of all sizes, including small operational, moderate, and worst case discharges. Special attention has been given to significant waterways and environmental and human use sensitivities which are crossed by, or in close proximity to, the pipeline facilities and which may be affected by petroleum or chemical releases. An ERP has three major objectives:

1. To establish safe and consistent methods for responding to, and mitigating impacts of, unplanned releases of hazardous substances, hazardous wastes, crude oil and refined petroleum products from pipeline operations.
2. To comply with applicable U.S. Department of Transportation (DOT), Resource Conservation and Recovery Act (RCRA), Occupational Safety and Health Administration (OSHA), and comparable state rules and regulations governing releases of oil and hazardous materials, and
3. To comply with U.S. DOT, OSHA, RCRA, and comparable state regulations requiring written procedures for emergency operations. Rapid activation of the ERP and comprehensive knowledge of its contents are important to the success of response operations. All key personnel involved in emergency planning operations are familiar with the plan. Copies of the ERP will be distributed to key management and response team individuals and will be maintained at selected facilities per DOT regulations (49 CFR 194).

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## TORRANCE LOGISTICS RESPONSE ORGANIZATION AND INTERACTIONS

The Torrance Logistics Company (TLC) consists of trained personnel that will respond to all TLC emergency incidents.

### EMERGENCY CONTACT: 1-877-662-4575

#### PRODUCTS/ DOT GUIDEBOOK ID#/ GUIDE#:

Crude Oil	1267	128
Diesel Fuel	1993	128
Fuel Oil	1202	128
Gasoline	1203	128
Kerosene	1223	128

#### CALIFORNIA COUNTIES OF OPERATION:

Kern                      Orange  
Los Angeles

*Changes may occur. Contact the operator to discuss their pipeline systems and areas of operation.*

The response teams are activated progressively depending on the size, severity, and circumstances of the spill/ release. TLC will generally conduct all response activities for small to medium releases and the initial response for larger releases. Technical and operational assistance from the nearest Oil Spill Response Organization (OSRO) will generally be required for many medium to large spills. Each response team's general role and responsibility is as follows:

- **Torrance Logistics Company's Response Team** – Composed of employees trained to implement the initial response to all spills/ releases. For small incidents, local personnel will generally execute all containment, recovery, and cleanup activities. For larger incidents, the response team may include TLC employees from beyond the local geographic area.

## TRAINING AND DRILLS

### General

The TLC response personnel are trained to qualify them for the assigned responsibilities. The Torrance Logistics Company initial responders periodically review emergency response procedures and their associated role(s) and

participate in selected response drills (notification, tabletop, and equipment deployment) conducted by TLC in accordance with the National Preparedness for Response Exercise Program (PREP). These team members' responsibilities include spill containment, recovery, protection, and cleanup operations. Selected team members have attended oil spill training schools. All TLC employees satisfy Hazardous Waste Operations and Emergency Response (HAZWOPER) standard training requirements.

## HAZWOPER REGULATORY REQUIREMENTS

### **Initial Certification**

Training requirements for emergency response are based on levels of emergency response recognized by the hazardous materials handling industry.

Emergency response and Post-Emergency Response are distinct operations as defined in OSHA 29 CFR 1910.120 and have distinct training requirements, which are outlined in the TLC Training and Education Guide. Below are the levels of Emergency Response Training in which employees may be certified.

- **First Responder/Awareness Level, 4 hours:** Persons who may witness or discover a release or impending release of a hazardous substance.  
**Responders trained to this level should be able to:**
  - Identify a hazardous substance release
  - Initiate an emergency response sequence (evacuate – phone call)
  - Notify proper authorities
- **First Responder/Awareness Level, 8 hours:** Persons trained to contain a release from a safe distance.
  - Take defensive action
  - Protect people, property and the environment
  - Prevent exposures and spreading
- **Hazardous Materials Technician Level, 24 hours:** Persons trained to aggressively mitigate the release and demonstrate competency in a variety of areas including:
  - Stopping the release
  - Take aggressive (offensive) role
  - Approach the point of release to stop it

- Function in Incident Command system (ICS)
- Implement ER Plan
- Use monitoring equipment
- Develop a Site Safety and Health Plan

- **Hazardous Materials Specialist Level, 24 hours plus specialty:** Persons trained to the level of Hazardous Materials Management (HAZMAT) technicians, but designated to provide specific support services versus direct mitigation involvement.
  - Implementing the local emergency response plan
  - Classify, identify and verify hazardous substances using advanced survey instruments and equipment
  - Know applicable state emergency response plan
  - Know how to select and use specialized chemical Personal Protective Equipment (PPE)
- **On-Scene Incident Commander Level, 24 hours plus Incident Commander Training:** Person who takes charge of the incident:
  - Know and be able to implement the employer's ICS
  - Know how to implement the employer's emergency response plan
  - Know and understand the hazards and risks of employees working in chemical protective clothing
  - Know how to implement the local response plan
  - Know of the State Emergency Response Plan and of the Federal Regional Response Team
  - Know and understand the importance of decontamination procedures
- **Skilled Support Personnel:** Heavy equipment operators, tow truck operators, other such persons needed on a temporary basis to perform a specific task.
- **Specialist Employees:** Technical experts such as Industrial Hygienists, Safety Personnel, Engineers, Maintenance/ Training Experts, Pipeline System Controllers require either training or some form of annual demonstration of competency in their field of specialization.

The point where a response changes from an emergency situation to a post-emergency situation is determined by the State or Federal On-Scene Coordinator or Incident Commander. It is typically associated with the transition from containment, recovery, and protection activities to cleanup and remediation operations. In many cases however, it is still considered an emergency until cleanup is completed and restoration/remediation operations (if required), are initiated.

## REFRESHER TRAINING REQUIREMENTS

Refresher training or a demonstration of competency is required annually to maintain qualification at all HAZWOPER levels.

## RESPONSE PERSONNEL HAZWOPER TRAINING LEVELS

### **TLC Response Personnel**

Team members are required under state and federal regulations to have the proper up-to-date training level to function in their position. All of the initial TLC members have at least twenty-four (24) hours of HAZWOPER certification training; whereas, the expanded TLC members have anywhere from eight (8) to greater than twenty-four (24) hours of HAZWOPER certification training.

## RESPONSE CONTRACTORS

All contractors responding to an TLC spill/release will be required by their contracts with TLC to satisfy the HAZWOPER training requirements of 29 CFR 1910.120 for their position.

### **Specialist Employees**

Specialist employees are experts who would provide technical advice or guidance during response to a spill incident. Examples of such specialists might include chemists, biologists, industrial hygienists, physicians, or others with skills useful during a spill response operation. Such persons must receive appropriate training or demonstrate competency in their specialty annually. There are no specific requirements on training content or hours of training for these persons except that it entails whatever is necessary to maintain competency in their specific area of expertise. Training and demonstration of competency for skilled support personnel and specialists should be documented.

### **Casual Laborers**

Casual laborers will generally not be hired by TLC, but may be employed by response operators or other response organizations. Contractors will be responsible for providing the appropriate HAZWOPER training to these laborers prior to their involvement in response operations.

### **Volunteers**

Volunteers are not utilized by TLC in spill response operations. They will generally be referred to the state or federal government agencies who may use them in wildlife rescue and rehabilitation operations. They may also be referred to the response contractors for utilization in non-oil contact operations. In either case, it will be the responsibility of the agencies or contractors to provide the required level of training to the volunteers.

### **TLC EMERGENCY RESPONSE TRAINING PROGRAM**

TLC's initial response personnel are trained, both in on-the-job instruction and in class HAZWOPER, ICS and web based safety and environmental training modules in order to safely, promptly and effectively response to a release event.

Many Logistics team members also receive recommended supplemental training in other general topics pertinent to spill response. This training (usually annually) is accomplished by attending the TLC seminars and training classes, cooperative training classes, external classes and seminars. Timing of this training will vary based on availability of classes, and will not be required for team members to perform their spill team job functions. A summary of the types of instruction provided includes the following:

- Emergency Response Plan content and use.
- Each individual's responsibility as identified in the Emergency Response Plan.
- Procedures for 24-hour notification of TLC management personnel, qualified individuals and key governmental agencies such as the National Response Center.
- Procedures for internal notification of management personnel for various types of spills, accidents and emergencies.

- Characteristics and identification of the hazards associated with the products transported by TLC, e.g. Hazard Communication (HAZCOM) and HAZWOPER training, including the Emergency Response Guidebook.
- Personal Protective Equipment.
- Critiques of recent drills and actual spill responses.
- Conditions that can worsen emergencies, and procedures to minimize potential safety and health hazards and environmental damage.
- Firefighting procedures.
- Use of air monitoring equipment and respiratory training.
- Procedures for spill control, containment, recovery and cleanup activities.

### **RESPONSE DRILLS**

Response drills evaluate the effectiveness of the Emergency Response Plan and the preparedness of response approval. Throughout the year, TLC conducts a variety of response drills at both manned and unmanned facilities in compliance with 49 CFR 194, Appendix A, Section 7(b), and the National Preparedness for Response Exercise Program (PREP). TLC will endeavor to participate in joint drills whenever possible. TLC Risk Assessment Surveys are considered in the development of TLC's drill program.

"Qualified Individual" notification exercises, emergency response equipment deployment drills, and spill management team tabletop exercises will be conducted by TLC satisfy the annual regional Spill Management Team exercise requirements.

TLC will utilize Qualified Individual (QI) notification exercises, Spill Management Team "tabletop" simulation exercises, emergency response Equipment Deployment Drills and/or combination exercises to ensure that all plan components are appropriately exercised. The fifteen (15) core components of a plan are described in the PREP Guidelines and in a following subsection entitled Response Plan Core Components. During each triennial cycle, all components of TLC's response plan will be exercised at least once. TLC will identify those components, as described in the PREP Guidelines, that are applicable for a particular drill. Using PREP Guidelines, TLC conducts drills for crude oil and product systems.

### **EMERGENCY RESPONSE EXERCISE / DRILL PROGRAM**

#### **Qualified Individual (QI) Notification Exercise**

Each quarter, TLC will conduct an exercise to test QI notification procedures. Personnel receiving this notification will respond to the individual initiating the exercise. Verification of receipt of the notification will be documented. If equipment failure or problems resulted in notification being delayed or prevented, these problems will be identified and corrected prior to the next exercise. One of these notification exercises per year will be done during non-business hours.

#### **ER Equipment Deployment Drills**

TLC will conduct semi-annual equipment deployment drills of TLC owned emergency response equipment. During these drills, facility response equipment will be deployed to simulate a local response to a spill/release occurring at TLC facilities. Deployment will include strategies in this response plan for protecting adjacent interests and sensitive areas. The TLC will deploy and inspect response equipment semi-annually, including equipment indicated in its response plan. Records of equipment deployed, personnel involved, and other information regarding the exercise will be documented on the Equipment Deployment Report, including Emergency Response Drill Critique and Lessons Learned. Forms will be maintained at TLC's headquarters.

Annual equipment deployment drills are also required of OSRO's in addition to facility-owned oil spill equipment deployment drills.

#### **Spill Management Team Tabletop Exercises**

TLC will conduct annually a regional Spill Management Team (SMT) Tabletop Exercise as indicated in this Plan. TLC will also conduct annually one (1) SMT Tabletop Exercise in the initial response mode for each response zone listed in this Plan. One of the SMT Tabletop Exercises in each zone will involve the zone's worst case discharge scenario during a three (3) year drill cycle.

#### **Unannounced Exercises/Drills**

Annually, each Response Zone will ensure that either the SMT or an emergency response Equipment Deployment drill be conducted unannounced. This is not a separate or additional exercise. An unannounced

exercise is where the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill incident.

#### **Exercise/Drill Self-Evaluation**

Following the completion of the required exercises/drills, TLC will conduct a self-evaluation review or critique. The review/critique will evaluate the effectiveness of the core components of the plan, and key response activities to determine the lessons learned. Corrective measures or follow-up actions may be derived from the exercise/drill evaluation process.

#### **Regulatory Exercises**

TLC will participate in agency sponsored/mandated drills as required. These drills may be initiated by the agencies as announced or unannounced. The regulatory agencies will also be invited to participate in the TLC Equipment Deployment drills and/or Spill Management Team Tabletop exercises.

#### **RESPONSE PLAN CORE COMPONENTS**

The content of the section is an excerpt from OPA-90's National Preparedness for Response Exercise Program (PREP) Guidelines. It is included in this plan to provide a better understanding of the characteristics exercised as core components.

During each triennial cycle, all components of a plan holder's response plan must be exercised at least once. The purpose of this requirement is to ensure that all plan components function adequately for response to an oil spill.

The 15 core components listed below are the types of components that must be exercised. However, all these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

1. **Notifications:** Test the notifications' procedures.
2. **Staff Mobilizations:** Demonstrate the ability to assemble the spill response organization.
3. **Ability to Operate Within the Incident Command System:**

- a) **Unified Command:** Demonstrate the ability to consolidate the concerns and interests of the other members of the unified command into a unified strategic plan with tactical operations. Unified command members are:
  - 1) Federal Representation
  - 2) State Representation
  - 3) Local Representation
  - 4) Responsible Party Representation
- b) **Spill Management Team :** Demonstrate the ability of the response organization to operate within the framework of the response system identified in their respective plans:
  - 1) **Operations:** Coordinate or direct operations related to the implementation of action plans.
  - 2) **Planning:** Consolidate the various concerns of the members of the unified command into joint planning recommendations and specific long-range strategic steps.
  - 3) **Logistics:** Provide necessary equipment and resources.
  - 4) **Finance/Administration:** Document the daily expenditures of the organization and provide cost estimates for continuing operations.
  - 5) **Public Affairs:** Form a joint information center and provide the necessary interface between the united command and the media.
  - 6) **Safety Affairs:** Monitor all field operations and ensure compliance with safety standards.
  - 7) **Legal Affairs:** Provide the unified command with suitable legal advice and assistance.
4. **Discharge Control:** Spill response organization to control and stop the discharge at the source.
5. **Assessment:** Provide initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations..
6. **Containment:** Contain the discharge at the source or in various locations for recovery operations.

7. **Recovery:** Recover the discharged product.
  - a) **On-Water Recovery:** Deploy on-water recovery resources.
  - b) **Dispersant Use:** Quickly evaluate the applicability of dispersant use for this incident and implement the protection strategies.
8. **Protection:** Protect the environmentally and economically sensitive areas
  - a) **Protective Booming:** Deploy sufficient resources to implement the protection strategies.
  - b) **Dispersant Use:** Quickly evaluate the applicability of dispersant use for this incident and implement the protection strategies.
  - c) **In-Situ Burning:** Quickly evaluate the applicability of in-situ burning for this incident and implement a pre-approved plan.
  - d) **Water Intake Protection:** Identify water intakes and implement the proper protection procedures.
  - e) **Wildlife Recovery and Rehabilitation:** Resources at risk and implement the proper protection.
  - f) **Population Protection:** Identify health hazards associated with the discharged product and the population at risk from these hazards, and to implement the proper protection procedures.
  - g) **Bioremediation:** Quickly evaluate the applicability of bioremediation use for this incident.
9. **Disposal:** Dispose of the recovered material and contaminated debris.
10. **Communications:** Establish an effective communications system for spill response organization.
  - a) **Internal Communications:** Establish an intra-organization both within the administrative elements and the field units.
11. **Transportation:** Provide effective multi-mod transportation both for execution of the discharge and support functions.
  - a) Land Transportation
  - b) Waterborne Transportation
  - c) Airborne Transportation



- 12. Personnel Support:** Provide the necessary support of all personnel associated with the response.
- Management:** Provide all administrative management of all personnel involved in the response. This requirement includes the ability to move personnel into or out of the response organization with established procedures.
  - Berthing:** Provide overnight accommodations on a continuing basis for a sustained response.
  - Messing:** Provide suitable feeding arrangements for personnel involved with the management of the response.
  - Operational and Administrative Spaces:** Provide suitable operational and administrative spaces for personnel involved with the management of the response.
- 13. Equipment Maintenance and Support:** Provide the necessary support of all personnel associated with the response.
- Response Equipment:** Provide effective maintenance and support for all response equipment.

- Support Equipment:** Provide effective maintenance and support for all equipment that supports the response. This requirement includes communication equipment, transportation equipment, administrative equipment, etc.

- 14. Procurement:** Demonstrate the ability to establish an effective procurement system to obtain.

- Personnel
- Response Equipment
- Support Equipment

- 15. Documentation:** To document all operational and support aspects of the response and provide detailed records of decisions and actions taken.

### HAZARDOUS WASTE TRAINING

TLC field operations personnel receive extensive regulatory-required training in HAZWOPER, HAZCOM, emergency response, fire fighting, and other areas as described in this section and in TLC's training curriculum. Employees at sites which generate hazardous waste receive additional orientation and training specific to hazardous waste regulatory requirements, and hazardous waste emergency response. Site emergency coordinators (qualified individuals) also receive additional training on ICS.

Hazardous waste management activities are directly overseen in the field by TLC's Regulatory Specialists. In addition to the training described above, Specialists receive initial classroom or on-the-job hazardous waste training and annual hazardous waste refresher training. This training includes the following general elements:

- Hazardous Waste Regulatory Overview and Compliance Assurance
- Hazardous Waste Management Procedures
- Hazardous Waste Emergency Response, Equipment and Systems

Other employees at a site which hazardous waste may be present, but who are not directly involved in the handling or oversight of that waste, receive general awareness/orientation training on the waste in question from the Field Regulatory Specialist.

### CONCLUSION

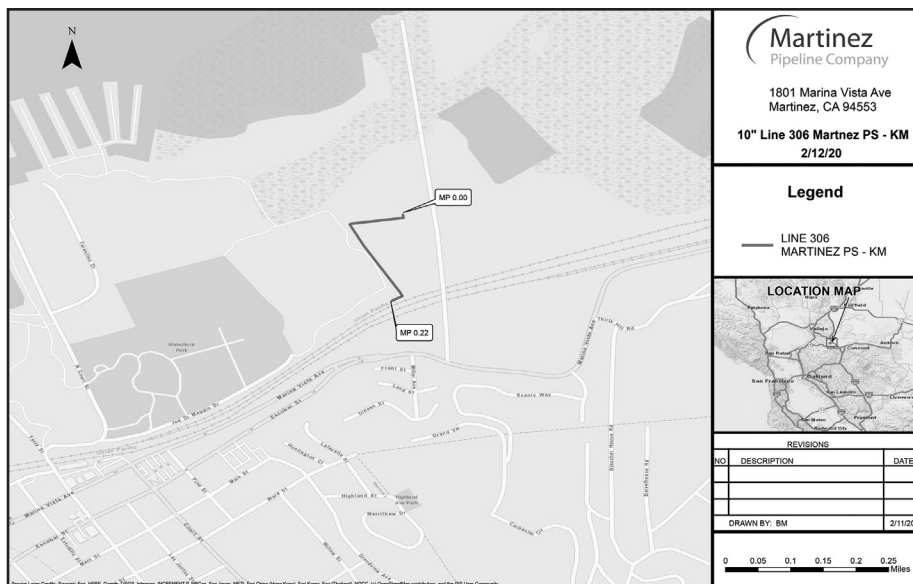
At Torrance Logistics, safety is the number one priority. The goal is to avoid accidents or incidents, but, if one does occur, and effective emergency response plan is maintained at all times to mitigate the consequences.

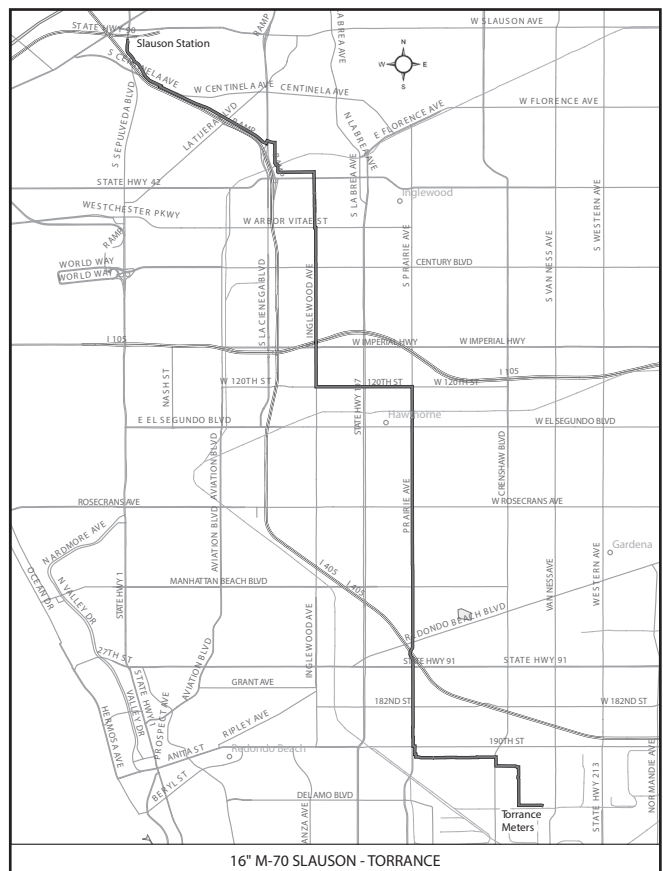
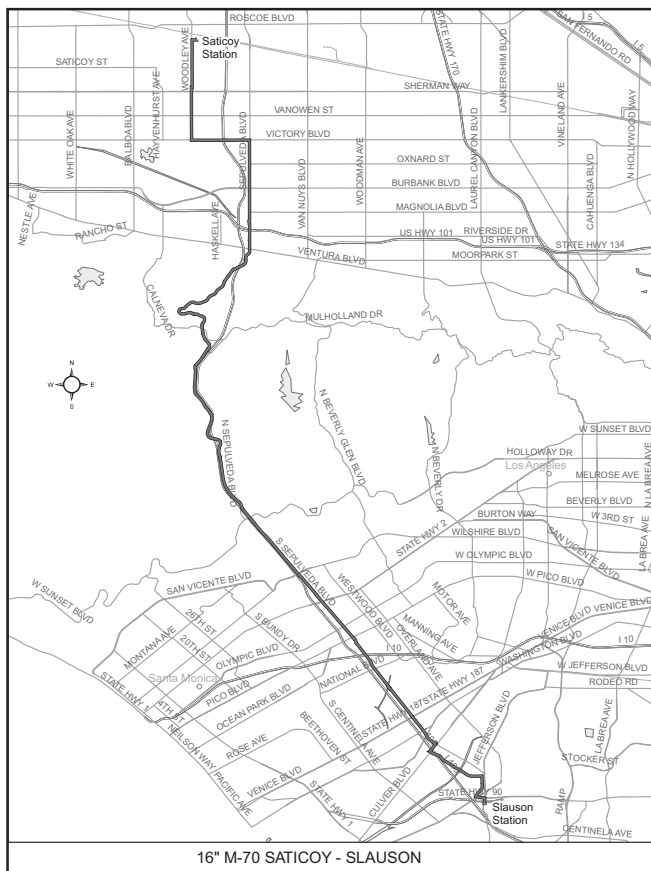
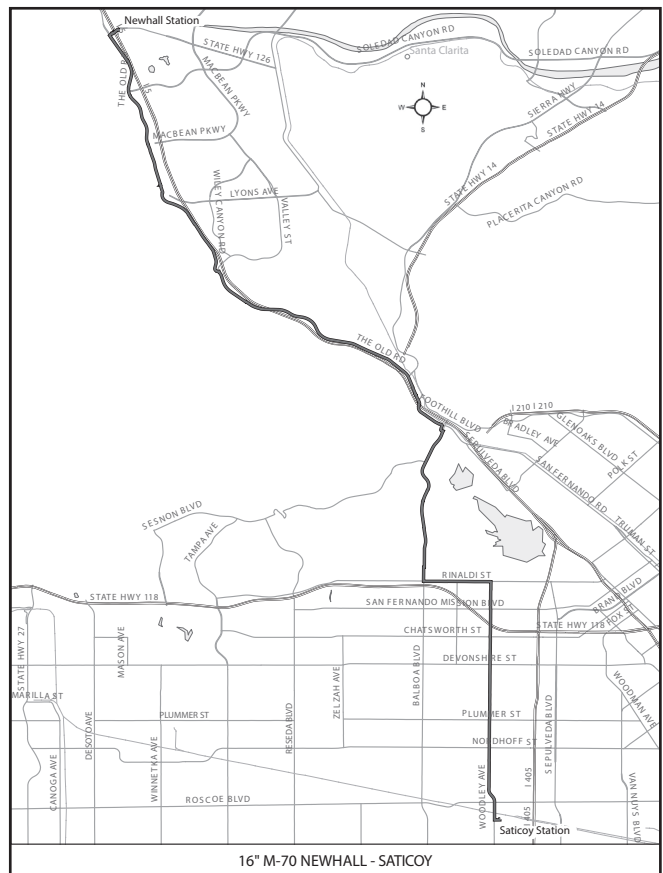
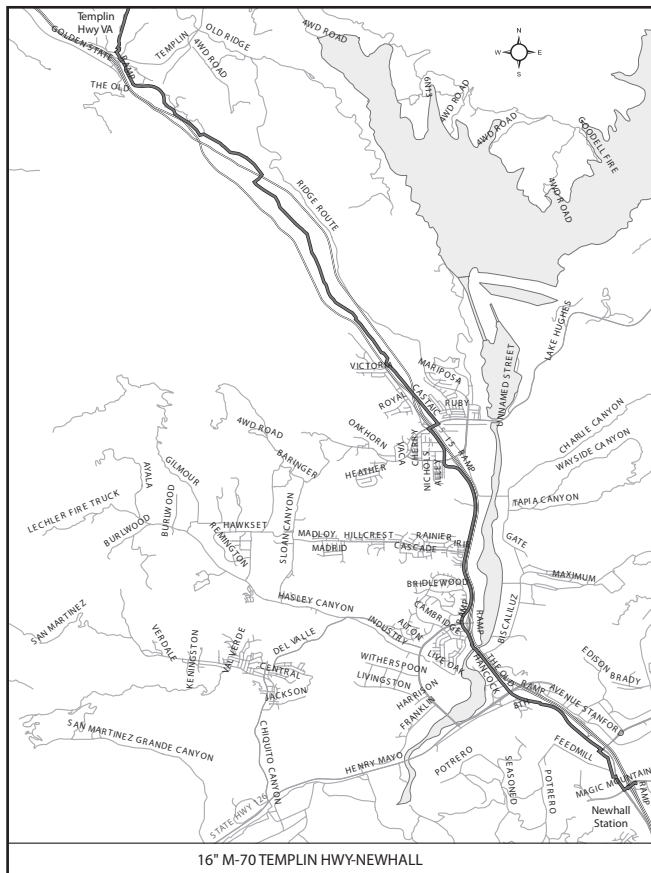
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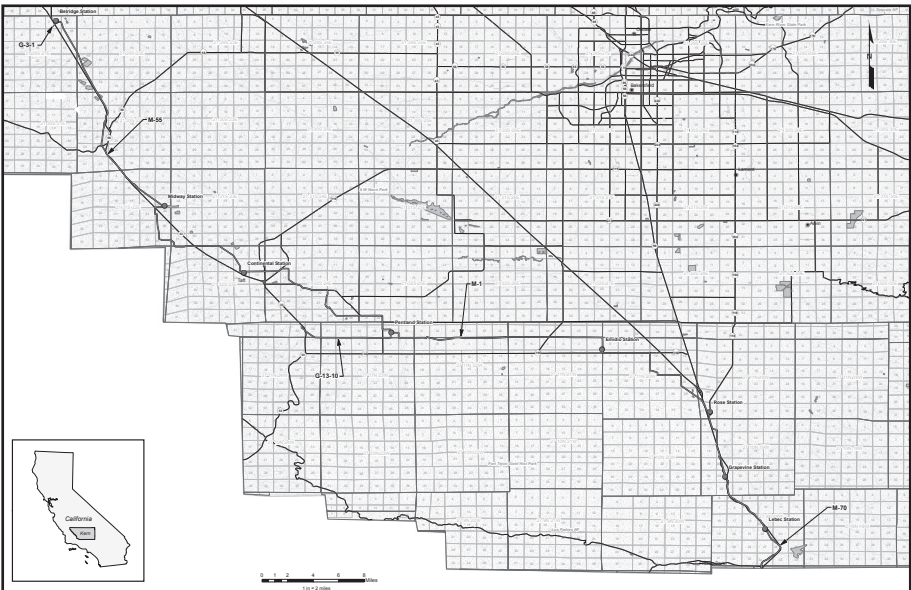
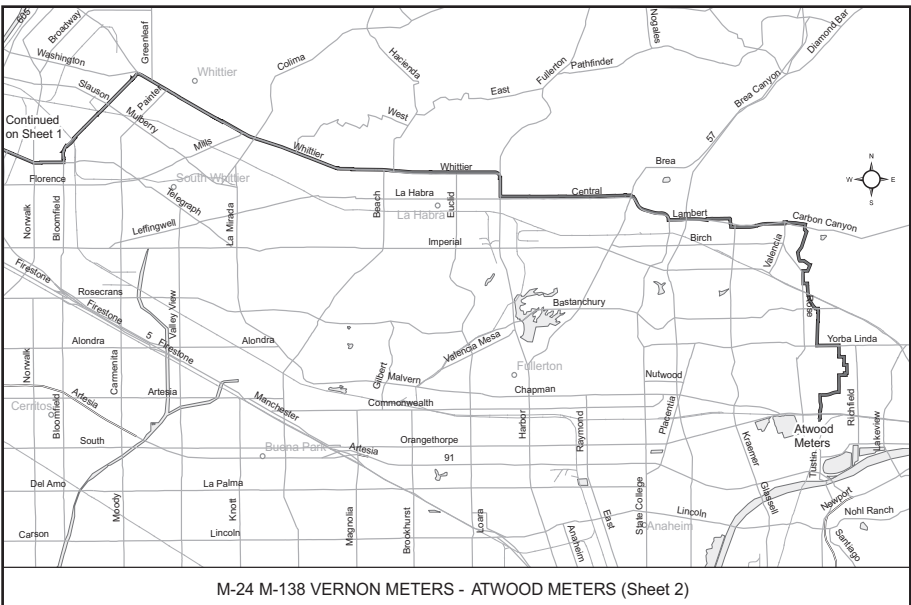
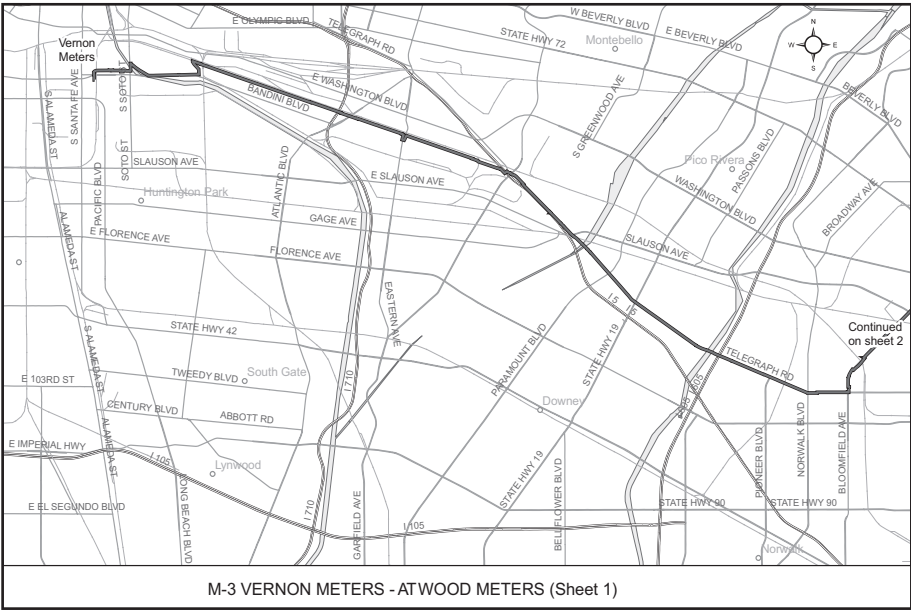
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