

ATTACHMENT 46 – *PHMSA REVIEW OF ENBRIDGE FACILITY RESPONSE PLAN*



Facility Response Plan Review
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHMSA)
Office of Pipeline Safety (OPS)

OPS Sequence Number: **Chicago Region- #867**

Facility Response Plan- ***Region Specific Book 7-Emergency Response Plan (ERP)***

Version Date: April 2009

Pipeline Operator Name: **Enbridge (U.S.) Inc.**

Contact Name: Jason Boisvert, Sr. Emergency Response Engineer

Contact Phone Numbers Office: 780-420-5255

Fax: 780-420-8253

Cellular: 780-893-0180

Contact Mailing Address: Enbridge Pipelines, Inc.

10201 Jasper Avenue

Edmonton, AB T5J 3N7 Canada

Contact Electronic Mail Address: jason.boisvert@enbridge.com

If different from the Contact Name, Facility Response Plan Author Name:

Facility Response Plan Author Phone Numbers- Office:

Fax:

Cellular:

Facility Response Plan Author Mailing Address:

Facility Response Plan Electronic Mail Address:

Questionnaire Submission Date: April 1, 2010

**NATIONAL CONTINGENCY PLAN AND AREA CONTINGENCY PLAN CERTIFICATIONS
FOR SEQUENCE NUMBER: 867**

1. A. Has the operator reviewed the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP)? **YES**
- B. Does the Facility Response Plan follow the Area Contingency Plan? **YES**
- C. Please list the names of the Area Contingency Plans and the pages in the Facility Response Plan (ERP) that relate to the Area Contingency Plans. (49 CFR 194.107 (b))

See Page Reference:

[Region Specific Book 7 ERP-](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

Comment:

A. *A review of the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP) has been completed.*

B. *The Facility Response Plan follows the Area Contingency Plan.*

C. *The Chicago Region falls within the scope of the following: **U.S. Coast Guard (USCG) Ninth District, the USCG Marine Safety Offices in: Buffalo, NY, Burr Ridge, IL, Detroit, MI, and Milwaukee, WI. and the U. S. Environmental Protection Agency (EPA) Region 2 & Region 5 Area Contingency Plans.** These are referenced in the Enbridge Facility Response Plan (49 CFR 194.107 (b)).*

**PLAN INFORMATION SUMMARY
FOR SEQUENCE NUMBER: 867**

2. Does the Plan Information Summary contain the following: (49 CFR 194.107 (c)(1), (c)(1)(i), and (c)(2) and 49 CFR 194.113)
 - The Operator Name, Street Address, City, State, and Zip Code. **YES**
 - A list of response zones that meet the criteria for significant and substantial harm (49 CFR 194.113(a)(2) and a list of response zones in which a worst case discharge could cause substantial harm. **YES**
 - The basis for the operator's determination that the response zone meets the criteria for significant and substantial harm and a statement that a worst-case discharge in the response zone can be expected to cause significant and substantial harm for each response zone. **YES**
 - Description of each response zone, including the County(s) or Parishes and State(s). **YES**
 - Explanation for each response zone designation. **YES**
 - Names (s), titles(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone. **YES**
 - Names (s), titles(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone. **YES**
 - List of line sections in each response zone by milepost, survey station number, or other operator designation. **YES**
 - If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed. **YES**
 - The type of oil and the volume of the worst- case discharge. **YES**

See Page References:

[Region Specific Book 7 ERP- Tab 1](#)

- **Page 4-6-** Description of each response zone, including the County(s) and States.
- **Page 4-** Names (s), titles(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone.
- **Page 4-** Names (s), titles(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone.
- **Page 4-** Explanation for each response zone designation.
- **Page 7-** List of line sections in each response zone by milepost & survey station number designation.
- **Page 7-** If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed.

[Region Specific Book 7 ERP- Tab 3- Maps and References](#)

- **HCA Tables-** A list of response zones that meet the criteria for significant and substantial harm (49 CFR 194.113(a)(2) and a list of response zones in which a worst case discharge could cause substantial harm.

[Region Specific Book 7 ERP- Appendix](#)

- **Page 1-** The Operator Name, Street Address, City, State, and Zip Code:
Enbridge (U.S.) Inc.
Operator of the Enbridge Pipeline Systems
1100 Louisiana, Suite 3200
Houston, TX 77002-5216
- **Pages 1-2-** Description of each response zone, including the County(s) and States.
- **Page 4-** List of line sections in each response zone by milepost & survey station number designation.
- **Page 4-** If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed.
- **Page 7-8** A list of response zones that meet the criteria for significant and substantial harm (49 CFR 194.113(a)(2) and a list of response zones in which a worst case discharge could cause substantial harm.
- **Pages 8-9** The basis for the operator's determination that the response zone meets the criteria for significant and substantial harm and a statement that a worst-case discharge in the response zone can be expected to cause significant and substantial harm for each response zone. Based on the High Consequence Area Management Plan and HCA Map Book.
- **Pages 4 & 8-** The type of oil and the volume of the worst- case discharge.

[Supplemental Resource: Emergency Response Directory \(ERD\)](#) – Product Information tab- Properties and frequently asked questions

NOTIFICATIONS
FOR SEQUENCE NUMBER: 867

3.1 What person, position, or facility is responsible for starting immediate notification? (49 CFR 194.107 (c)(1)(ii) Please list the person's, position's, or facility's mailing and electronic mail addresses and office, fax, and cellular telephone information. **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

[Sec 02-02-01- Pages 1-4](#)– Emergency Notification

Region Specific Book 7- ERP

Tab 1- Page 4- 24 Hour Contact

Appendix- Pages 5-6- Consistency with National and Area Contingency Plans

Supplemental Resource: Emergency Response Directory (ERD)- Notification Procedures tab

Comment:

The immediate emergency notification plan begins at the Control Center. As requested the facility address and phone numbers are listed below:

**Edmonton Control Center
10201 Jasper Avenue
Edmonton, AB T5J 3N7
(780)-420-8899 (Phone Number)
(800) 858-5253 (24 Hr Emergency Number) Edmonton Control Center
(780)-420-8122 (Fax)**

3.2 Is the person, position, or facility capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(c)(1)(ii)) Please describe your immediate notification plan. **YES**

See Page References:

O & MP Book 7: Emergency Response

Sec 02-02-01- Pages 1-4- Emergency Notification

Supplemental Resource: Emergency Response Directory (ERD)- Notification Procedures tab

Comment:

The immediate emergency notification plan begins at the Edmonton Control Center (ECC). The Control Center is fully capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year. For information on responsibilities see the ECC Procedures database. This includes responding to, investigating and correcting abnormal operations or shutdown:

- *Unintended valve closure or shutdown*
- *Increase or decrease in pressure or flow rate outside normal operating limits*
- *Loss of communications*
- *Operation of a safety device*
- *Any other malfunction of a component, deviation from normal operation, or employee error that could cause a hazard to persons or property*

When an emergency or suspected emergency report is received from the public, police, or an employee, the Control Center will notify:

- *Local police, if required*
- *Regional management*
- *Shipper services*

3.3 Do the Facility Response Plan notification procedures include telephone numbers so that the qualified individual(s) and oil spill removal organization(s) can be reached twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(b)(1) and (2), 194.107(c)(1)(ii) and 194.113(b)(2))

- Qualified Individual(s)? **YES**
- Oil Spill Removal Organization(s)? **YES**
- Are the National Response Center numbers correctly listed as 1-800-424-8802 and 202-267-2675 in the plan? **YES**
- Company personnel (spill management team)? **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 1- Page 4- Region Specific- Qualified Individuals

Tab 2- Page 26-27 Company/Co-Op Equipment Lists- Specialty Contractors (Oil Spill Removal Organization)

[Supplemental Resource: Emergency Response Directory \(ERD\)](#)- Notification Procedures tab, Company Personnel tabs, and Emergency Contacts tab- these tabs contain current telephone numbers for company and contractor resources, as well as the National Response Center numbers 1-800-424-8802 and 202-267-2675.

3.4 Does the notification section include the following information? (49 CFR 194.107(b)(1) and (2), and 194.107(c)(1)(ii))

- Name of pipeline operator? **YES**
- Time of discharge? **YES**
- Location of discharge? **YES**
- Name of oil involved? **YES**
- Reason for discharge? **YES**
- Estimated volume of oil discharged? **YES**
- Weather conditions on scene? **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 3- Maps and References- This information is covered within the Enbridge Release Alert Form.

[Supplemental Resource: Emergency Response Directory \(ERD\)](#)- Forms tab- Form F

3.5 Does the Facility Response Plan (ERP) name and give the address(es) and telephone number(s) for the operator's oil spill removal organizations? (49 CFR 194.107(c)(1)(iv) and 194.115)

- Name(s)? **YES**
- Address(es)? **YES**
- Telephone Number(s)? **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Page 26-27- Company/Co-Op Equipment Lists- Specialty Contractors

[Supplemental Resource: Emergency Response Directory \(ERD\)](#)- Contractors tab

SPILL DETECTION AND MITIGATION PROCEDURES FOR SEQUENCE NUMBER: 867

4.1 Does the Facility Response Plan (ERP) contain procedures to name and mitigate or prevent a substantial threat of a worst-case discharge? (49 CFR 194.107(a) and (b)(2)(i)) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Appendix - Pages 5-6- Consistency with National and Area Contingency Plans

Appendix - Pages 7-8- Calculation of Worst Case Discharge

[O & MP Book 7: Emergency Response](#)

Sections 1 through 4- Contain actions and procedures for mitigating or preventing substantial threat of a worst case discharge.

4.2 Does the Facility Response Plan (ERP) name personnel, equipment and procedures for detecting leaks and spills and locating spills throughout the response zone? (49 CFR 194.107(c)(1)(iii)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-01-Pages 1-4- Emergency Notification

Sec 02-02-02-Pages 1-4- First Responder

Sec 02-02-03-Pages 1-16- Incident Command System

[Supplemental Resource: Emergency Response Directory \(ERD\)](#)- *Company Personnel tab*

[Supplemental Resource: The Control Center Procedures](#)

4.3 Does the Facility Response Plan (ERP) name the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather? (49 CFR 194.105(b)(1)) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Appendix- Pages 7-8- Calculation of Worst-Case Discharge

[Supplemental Resource: The Control Center Procedures](#)

4.4 Does the Facility Response Plan (ERP) have procedures to mitigate spills appropriate for the response zone(s) and consistent with applicable Area Contingency Plan(s)? (49 CFR 194.107(b)(2)(i), and (c)(a)(iii)and (v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sections 1 through 4- Contain actions and procedures for mitigating and preventing spills.

[Region Specific Book 7- ERP](#)

Tab 2- Page 1- Company/Co-Op Equipment Lists

Appendix- Pages 5-6- Consistency with National and Area Contingency Plans

SPILL CONTAINMENT FOR SEQUENCE NUMBER: 867

5.1 Does the Facility Response Plan (ERP) name spill containment strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i) and (c)(1)(v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 04- Containment, Recovery and Clean-up

Sec 04-02-01- Pages 1-8- On Land

Sec 04-02-02- Pages 1-6- In Wetlands

Sec 04-02-03- Pages 1-5- In Muskeg

Sec 04-02-04- Pages 1-7- In Rivers

Sec 04-02-05- Pages 1-3- In Lakes

Sec 04-02-06- Pages 1-6- On Ice

Sec 04-02-07- Pages 1-6- Under Ice

Sec 04-02-08- Pages 1-3- During Freeze-up or Break-up

Sec 04-02-09- Pages 1-6- In Sensitive Areas

Sec 04-02-10- Pages 1-9- In-Situ Burning

5.2 Can planned spill containment activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 3- Maps and References- Region Emergency Response Times Map

5.3 Are containment equipment capacities described in sufficient detail and does the Facility Response Plan (ERP) identify enough spill containment equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i), (C)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Pages 2-52- Company/Co-Op Equipment Lists

[O & MP Book 7: Emergency Response](#)

Sec 01-02-02- Pages 1-3- Support Equipment and Services

**SPILL RECOVERY
FOR SEQUENCE NUMBER: 867**

6.1 Does the Facility Response Plan (ERP) identify spill recovery strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), (iv), and (c)(1)(v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 04- Containment, Recovery and Clean-up

Sec 04-02-01- Pages 1-8- On Land

Sec 04-02-02- Pages 1-6- In Wetlands

Sec 04-02-03- Pages 1-5- In Muskeg

Sec 04-02-04- Pages 1-7- In Rivers

Sec 04-02-05- Pages 1-3- In Lakes

Sec 04-02-06- Pages 1-6- On Ice

Sec 04-02-07- Pages 1-6- Under Ice

Sec 04-02-08- Pages 1-3- During Freeze-up or Break-up

Sec 04-02-09- Pages 1-6- In Sensitive Areas

Sec 04-02-10- Pages 1-9- In-Situ Burning

6.2 Can planned spill recovery activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 3- Maps and References- Region Emergency Response Times Map

6.3 Are recovery equipment capacities described in sufficient detail and does the Facility Response Plan (ERP) identify enough spill recovery equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i), (C)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Pages 2-52- Company/Co-Op Equipment Lists

DISPOSAL
FOR SEQUENCE NUMBER: 867

7.1 Does the Facility Response Plan (ERP) identify disposal procedures, including temporary storage equipment for recovered oil appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), and (c)(1)(v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-08- Pages 1-2- Waste Management

[Region Specific Book 7- ERP](#)

Tab 2- Pages 1-52- Company/Co-Op Equipment Lists

7.2 Can planned temporary storage and waste disposal activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Pages 1- Company/Co-Op Equipment Lists

Tab 3- Maps and References-Region Emergency Response Times Map

7.3 Does the Facility Response Plan (ERP) identify sufficient temporary storage capabilities to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i), (C)(1)(v) and 194.115) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-08- Pages 1-2- Waste Management

[Region Specific Book 7- ERP](#)

Tab 2- Pages 1-52- Company/Co-Op Equipment Lists

SENSITIVE AREA PROTECTION
FOR SEQUENCE NUMBER: 867

8.1 Does the Facility Response Plan (ERP) identify the protection strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), (ii), and (c)(1)(v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sections 1 through 4- Contain actions and procedures for the protection of the public, personnel and the environment

[Region Specific Book 7- ERP](#)

Tab 5- Pages 1-9- Region Security Plan

8.2 Can planned protection activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.115) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Page 1- Company/Co-Op Equipment Lists

Tab 3- Maps and References- Region Emergency Response Times Map

**RESPONSE MANAGEMENT
FOR SEQUENCE NUMBER: 867**

9.1 Is the response management system described in the Facility Response Plan (FRP) based on an Incident Command System? (49 CFR 194.107(b)(1)(i), (b)(2)(i), (iii), and (c)(3)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-03- Pages 1-16- Incident Command System

9.2 Does the operator's response organization describe roles and responsibilities for: (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.117)

- Qualified Individual? **YES**
- Other operator response personnel including the spill management team? **YES**
- Contracted Oil Spill Removal Organization? **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 01-02-02- Pages 1-2- Support Equipment and Services- Oil Spill Response Organization

Sec 02-02-01- Pages 1-4- Emergency Notification- Qualified Individual

Sec 02-02-03- Pages 1-16- Incident Command System- Other operator response personnel including the spill management team.

[Region Specific Book 7- ERP](#)

Tab 1- Page 4- Qualified Individual

Tab 2- Pages 26-27- Company/Co-Op Equipment Lists- Contracted Oil Spill Removal Organizations

9.3 Does the operator's response organization describe how the operator works with the Unified Command and with responders including: (49 CFR 194.107(b)(1)(i), (b)(2)(iii) and (c)(3))

- Oil Spill Removal Organization? **YES**
- State and Local Responders? **YES**
- Federal On-Scene Coordinator? **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-03- Pages 1-16- Incident Command System- all of the above

**COMMUNICATIONS, RESPONSE EQUIPMENT AND TRANSPORTATION
FOR SEQUENCE NUMBER: 867**

10.1 Does the Facility Response Plan (FRP) describe appropriate communications procedures and system(s) adequate for notifications and response operations? (49 CFR 194.107(c)(1)(ii) and (v)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-01- Pages 1-4- Emergency Notification

10.2 Does the Facility Response Plan (FRP) identify response equipment that the operator owns and maintains? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Pages 1-52- Company/Co-Op Equipment Lists

10.3 Does the Facility Response Plan (FRP) describe procedures for maintaining response equipment the operator owns? (49 CFR 194.107(c)(1)(viii)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 01-02-02- Pages 1-3- Support Equipment and Services

[Region Specific Book 7- ERP](#)

Tab 2- Page 1- Company/Co-Op Equipment Lists

10.4 Does the Facility Response Plan (FRP) identify Oil Spill Removal Organization(s) response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **N/A**

Comment:

Not applicable since Enbridge's current OSRO's are classified by the Coast Guard.

10.5 Does the Facility Response Plan (FRP) describe procedures for maintaining Oil Spill Removal Organization(s) response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(viii)) **N/A**

Comment:

Not applicable since Enbridge's current OSRO's are classified by the Coast Guard.

10.6 Does the Facility Response Plan (FRP) identify locations for operator owned and Oil Spill Removal Organization(s)-owned response equipment? (49 CFR 194.115(b)) **YES**

See Page References:

[Region Specific Book 7- ERP](#)

Tab 2- Pages 1-52- Company/Co-Op Equipment Lists- Specialty Contract or Contacts

10.7 Does the Facility Response Plan (FRP) describe mobilizing and deploying response equipment within the appropriate tier times consistent with the plan's response activities? (49 CFR 194.107(c)(1)(v) and 194.115(b)) **YES**

See Page References:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-03- Pages 1-16- Incident Command System

Sec 04-03-01- Pages 1-11- Deploying River Booms

[Region Specific Book 7- ERP](#)

Tab 3- Maps and References- Region Emergency Response Times Map

- Major Response Equipment Staging Area Map

10.8 Does the size of the response zone permit planned response activities, including equipment mobilization and deployment, within the appropriate tier times? (49 CFR 194.115(b)) **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Tab 3- Maps and References- Region Emergency Response Times Map

- Major Response Equipment Staging Area Map

**RESPONSE PERSONNEL AND MOBILIZATION
FOR SEQUENCE NUMBER: 867**

11.1 Does the Facility Response Plan (FRP) identify enough trained personnel to respond to the worst-case discharge consistent with the Plan's response activities? (49 CFR 194.107(a),(c)(1)(v) and (c)(3),194.115, and 194.117) **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Tab 2- Page 53- Company/Co-Op Equipment Lists – Emergency Response Trained Personnel

11.2 Does the Facility Response Plan (FRP) describe procedures for mobilizing and deploying response personnel throughout the response zone(s) consistent with the plan's response activities? (49 CFR 194.107(b)(2)(i), (c)(1)(v) and 194.115) **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-03- Pages 1-16- Incident Command System

**RESPONSE DOCUMENTATION AND WORST-CASE DISCHARGE
FOR SEQUENCE NUMBER: 867**

12.1 Does the operator describe procedures the response management organization must use to document response decisions, activities, and costs? (49 CFR 194.107(c)(3)) **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-09- Pages 1-5- Incident Records

Sec 02-02-10 Pages 1-2- Post-Emergency Review

12.2 Does the Facility Response Plan (FRP) provide the calculations and methodology used for determining the worst-case discharge for the response zone(s)? (49 CFR 194.105) **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Appendix- Pages 7-8- Calculation of Worst- Case Discharge

12.3 Is the worst-case discharge volume calculated using the three specified methods in the Department of Transportation regulation? Are the calculations accurate and as prescribed? (49 CFR 194.105(b)) **NO (See comments note below)**

See Page Reference:

[Region Specific Book 7- ERP](#)

Appendix- Pages 7-8- Calculation of Worst- Case Discharge

Comments:

Enbridge uses a more conservative approach in their calculations for worst case discharge which has been previously approved by PHMSA, as described in listed reference.

**TRAINING: PROGRAM AND PROCEDURES
FOR SEQUENCE NUMBER: 867**

13.1 Does the Facility Response Plan (FRP) describe a training program that teaches response personnel about the Plan and their responsibilities under the plan? (49 CFR 194.107(b)(1)(ii),(c)(1)(vii) and (c)(3), and 194.117) **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

Comment:

*For further information on emergency response training and exercises, see [**Book 2: Safety Sec 15-02-02.**](#)*

13.2 Does the Facility Response Plan (ERP) describe a training program that teaches response personnel about matters including (49 CFR 194.117(a)(3)):

- Oil characteristics and hazards? **YES**
- Conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions? **YES**
- Steps necessary to control an accidental discharge of oil? **YES**
- Steps necessary to minimize the potential for fire, explosion, or environmental damage? **YES**
- Proper fire-fighting procedures and use of personal protective equipment? **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

[Tab 2-Page 53- Company/Co-Op Equipment Lists - Emergency Response Trained Personnel](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

[O & MP Book 7: Emergency Response](#)

[Sec 01-02-03- Pages 1-3- Emergency Response Plans and Maps](#)

[Sec 02-02-04- Pages 1-3- Safety Precautions](#)

[Sec 02-02-06- Pages 1-4- Site Security and Control](#)

[Sec 02-02-10- Pages 1-2- Post-Emergency Reviews](#)

[Sec 03-03-02- Pages 1-6- Fires and Explosions](#)

Comment:

*For further information on emergency response training and exercises see [**Book 2: Safety Sec 15-02-02.**](#)*

13.3 Does the Facility Response Plan (FRP) describe a response training program that addresses the appropriate levels of training and the requirements in OSHA 29 CFR 1910.120? (49 CFR 194.107(b) (1)(ii) and 194.117(c)) **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

Comment:

*For further information on emergency response training and exercises see [**Book 2: Safety Sec 15-02-02.**](#)*

13.4 Does the Facility Response Plan (ERP) describe the operator's procedures for maintaining records for response personnel? (49 CFR 194.117(b)) **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

Sec 02-02-03- Page 13- Incident Command Center- Documentation Unit

Sec 02-02-09 Pages 1-5- Incident Records

[Region Specific Book 7- ERP](#)

Appendix- Pages 5-6- Consistency with National and Area Contingency Plans

Comment:

For further information on emergency response training and exercises see [Book 2: Safety Sec 15-02-02](#).

**SPILL RESPONSE DRILL PROGRAM
FOR SEQUENCE NUMBER: 867**

14.1 Does the Facility Response Plan (ERP) describe procedures for conducting internal and external drills that include (49 CFR 194.107(c)(1)(ix)):

- Responsibility for planning, carrying out, and monitoring drills? **YES**
- Announced drills? **YES**
- At least one unannounced internal drill? **YES**
- Quarterly Qualified Individual notification drills? **YES**
- Annual spill management team tabletop drills? **YES**
- Annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan? **YES**
- At least one drill that tests the entire response plan for each response zone at least once every three years? **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Tab 2- Page 53- Company/ Co-Op Equipment Lists - Qualified Individuals Notification:

- Quarterly Qualified Individual notification drills-

[O & MP Book 7: Emergency Response](#)

Sec 01-02-02- Pages 2-3- Support Equipment and Services- Spill Response Exercise:

- Responsibility for planning, carrying out, and monitoring drills- as per the National Preparedness for Response Exercise Program (PREP)
- Announced drills
- At least one unannounced internal drill
- Annual spill management team tabletop drills
- Annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan
- At least one drill that tests the entire response plan for each response zone at least once every three years

Comment:

For information on the frequencies required for spill response tabletop exercises, deployment exercises, and water, land and ice exercises, see [Book 2: Safety Sec 15-02-02](#).

14.2 Does the Facility Response Plan (ERP) describe a three-year drill and exercise cycle and the frequencies for each type of drill in that cycle? (49 CFR 194.107(c)(1)(ix)): **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

Sec 01-02-02- Pages 2-3- Support Equipment and Services- Spill Response Exercise

14.3 Does the Facility Response Plan (FRP) describe procedures for maintaining drill documentation for three-years? (49 CFR 194.107(c)(1)(ix)): **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Appendix- Page 6- Consistency with National and Area Contingency Plans

[O & MP Book 7: Emergency Response](#)

Sec 05-02-02- Record Keeping

Comment:

For information on record keeping on drill documentation, see [Book 2: Safety Sec 15-02-02](#).

RESPONSE PLAN MAINTENANCE FOR SEQUENCE NUMBER: 867

15.1 Does the Facility Response Plan (FRP) describe the requirements and procedures for the operator to (a) review the Facility Response Plans at least every five years from the date the Office of Pipeline Safety approves the plan, (b) modify the Facility Response Plan to address new or different operating conditions or information in the Facility Response Plan, and (c) submit the plan for the Office of Pipeline Safety to review, require changes, and approve? (49 CFR 194.107(c)(1)(x) and 194.12(a)) **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

Review and Revision- Pages 1-8

[Region Specific Book 7- ERP](#)

Tab 1- Page 1- Revision Process

15.2 Does the Facility Response Plan (ERP) identify key factors that may cause revisions to the response plan and require the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including: (49 CFR 194.121(b))

- New pipeline construction or purchase? **YES**
- Different worst-case discharge volume? **YES**
- Change in commodities transported? **YES**
- Change in Oil Spill Removal Organization(s)? **YES**
- Change in Qualified Individuals? **YES**
- Change in National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies? **YES**
- Change in response procedures? **YES**

See Page Reference:

[Region Specific Book 7- ERP](#)

Tab 1- Page 1- Revision Process

15.3 Does the Facility Response Plan (ERP) describe procedures for incorporating improvements in the following? (49 CFR 194.121(b)(8))

- Post-drill evaluation results? **YES**
- Post-incident evaluation results? **YES**

See Page Reference:

[O & MP Book 7: Emergency Response](#)

[Sec 01-02-02- Pages 2-3- Support Equipment and Services- Adhere to the National Preparedness for Response Exercise Program \(PREP\) guidelines for post drill evaluation](#)

[Sec 02-02-03- Page 13- Incident Command Center- Documentation Unit for post- emergency review](#)

[Sec 02-02-10- Pages 1-2- Post-Emergency Reviews- for emergency response actions](#)

Comment:

*For information on determining causes of incidents and preventing similar events from occurring, see **[Book 1: General Reference: Incident Reporting 02-02-02, Incident Investigation 02-02-03 & Investigating Piping Failures 02-02-04.](#)***

**NATIONAL CONTINGENCY PLAN AND AREA CONTINGENCY PLAN CONSISTENCY
FOR SEQUENCE NUMBER: 867**

16.1 Is the Plan consistent with the National Contingency Plan in effect at the time of submission? (49 CFR 194.107(b)(1)) Please answer yes or no. **YES**

See Page Reference:

[Region Specific Book 7 ERP-](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

16.2 Is the Plan consistent with the Area Contingency Plans in effect for each response zone at the time of submission? (49 CFR 194.107(b)(2)) Please answer yes or no. **YES**

See Page Reference:

[Region Specific Book 7 ERP-](#)

[Appendix- Pages 5-6- Consistency with National and Area Contingency Plans](#)

16.3 Is the Plan's concept of operations adequate to carry out a response to the worst-case discharge under 49 CFR 194? (49 CFR 194.107) Please answer yes or no. **YES**