

Emergency Action Plan

Fort Lauderdale Transflo 890 SW 21st Ave. Fort Lauderdale FL 33312

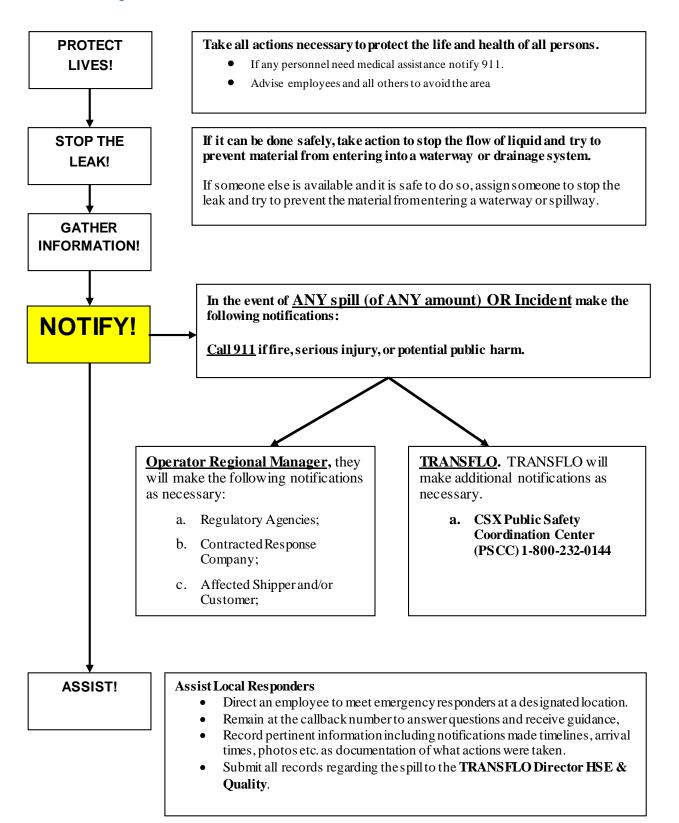
(954) 584-3111

Operated by: Arrow Material Services, LLC.

EAP ISSUE DATE: 03/15/13

Revision DATE: 03/02/18

Incident Response Procedures



Prepared by: Gary B Smith	TRANSFLO EAP	Issue Date: 3/5/13
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Emergency Contacts - RED TAB

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Terminal Site Plan

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iii. Emergency Action Plan Change Record

TRANSFLO Fort Lauderdale, FL Terminal

Reason for Change	Changes	Revision #
Original Plan	N/A	0
Update for global acronym changes	MFO&E → Transflo ROM MSDS → SDS	1
Update to add "CODE GRAY"	"CODE GRAY" added to 1.2, 2.1 and page 2.11	2
Update to add New Product	"Blast Furnace Slag" added to 1.5 "Materials on Site"	3
Update to add New Product	"Cooking Oil" added to 1.5 "Materials on Site"	4
Updated Appendix E	Phone and Physical Location	5
Updated Contact List	Added Gregg McDanel to listing	6
	Original Plan Update for global acronym changes Update to add "CODE GRAY" Update to add New Product Update to add New Product Update d Appendix E	Original Plan Update for global acronym changes WFO&E → Transflo ROM MSDS → SDS Update to add "CODE GRAY" "CODE GRAY" added to 1.2, 2.1 and page 2.11 Update to add New Product "Blast Furnace Slag" added to 1.5 "Materials on Site" Update to add New Product "Cooking Oil" added to 1.5 "Materials on Site" Updated Appendix E Phone and Physical Location

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1. GENERAL INFORMATION

1.1. Purpose of the Plan

This Emergency Action Plan is to be utilized by the Fort Lauderdale TRANSFLO terminal in the event of a fire, explosion, accidental release, or other natural or man-made emergency at this terminal. The purpose of this plan is to minimize and eliminate where possible hazards to human health, the environment, and property. The intent of this plan is to protect the work force, the surrounding community, the environment, and property from fire, explosion, or any unplanned sudden or non-sudden accidental release of hazardous or flammable commodities at this location, or other natural disasters.

This plan covers only those operations that include transfer of products listed in Table 1. This plan does not cover the adjacent CSX Transportation (CSXT) railroad operations; however notification and evacuation resulting from a serious emergency will be coordinated with CSXT management and personnel.

This plan is intended to meet the requirements of the following regulatory programs:

- OSHA, 29 CFR 1910.38 Emergency Action Plan
- EPA, 40 CFR Part 265 30-37/50-56 Contingency Plan and Emergency Procedures
- Storm Water Pollution Prevention Plan Emergency Response Plan

1.2. When is the Plan Implemented?

In the event that one or more of the following emergencies occur, this contingency plan will be implemented immediately.

- Medical emergencies involving employees, contractors or visitors which require any medical treatment beyond first aid. This includes both emergency medical transportation from the site and non-emergency cases.
- Fire & Explosion:
 - a. Any fire or potential fire that involves a commodity has the potential to spread, or has the potential to release toxic fumes.
 - b. Any explosion or potential explosion that occurs in, on, or near the facility. This includes any fires or explosions involving hazardous waste operations or materials.
- Uncontrolled release of materials: Any release or potential release of hazardous material, petroleum-based material, hazardous waste or other material that may cause undesirable environmental damage. This can include liquid product releases as well as uncontrolled vapor releases from process equipment or railcars.

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- Vapor Release: Any release of vapors and/or fumes, which may be hazardous to the personnel at the facility or the surrounding community.
- Active Shooter: Any active shooter situation which may be harmful to the personnel at the facility or the surrounding community.
- Acts of God: Any incidents related to weather or acts of God, which cause the facility to be in imminent danger.
- Security Incidents: Including terminal break-ins and bomb threats or terrorist attacks.

1.3. Terminal Relationships

This terminal is operated by TRANSFLO Terminal Services, Inc. (TRANSFLO) is a wholly owned subsidiary of CSX Corporation and a sister-company to CSX Transportation (CSXT).

The terminal is operated by contract operators under the operational direction and oversight of TRANSFLO. Operator personnel are expected to be aware of the requirements of this plan, and to take necessary actions listed in this plan in the extent of an emergency situation outlined in this plan.

The terminal is located at 890 SW 21st Ave., Fort Lauderdale FL 33312.

Arrow Material Services, LLC is the contract operator for the TRANSFLO Fort Lauderdale and is responsible for the day-to-day terminal operations.

1.4. Plan Review and Change

This plan will be reviewed annually by the Terminal Operator and TRANSFLO operations personnel and contract operators or when an administrative or operational change occurs which would require modification to this plan.

Any modification to this plan beyond simple administrative changes to names, telephone numbers or editing will be subject to review by the TRANSFLO Director of HS&E and/or Director of Operations. All affected stakeholders to this plan will be provided with an updated copy after the plan is reviewed and changed.

An Emergency Action Plan change record is included at the beginning of this document.

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1.5. Materials on Site

Bulk Materials on Site for Product Transfers: See terminal manager or other emergency coordinator for location of products on specific tracks. Safety Data Sheets for all products are maintained in the terminal office and emergency information box at front gate.

Table 1. Materials on Site

Material Name	DOT	LOCATION	UN/NA	RQ
	HAZMAT		Number	
Hydrogen Peroxide (Conc> 52% (*Hazardous Substance as per 40 CFR Appendix A to 355)	Yes	Railcar	UN2014 (50% is N/A) UN2015 (70% is applicable	*1000 lbs
Cement	N	Railcar	N/A	
Diesel Fuel	N	500 Gallon Double Walled Tank	N/A	
Ground Limestone	N	Railcar	N/A	
PVC (Polyvinylchloride)	N	Railcar	N/A	
Quicklime (Fines)	N	Railcar	N/A	
Quicklime (Rice)	N	Railcar	N/A	
Quicklime (WG Small)	N	Railcar	N/A	
Used Oil	N	Railcar	N/A	SoF - >25 Gal. or any Quantity threating water ways.
Used Cooking Oil	N	Railcar	N/A	
Blast Furnace Slag	N	Railcar	N/A	
Cooking oil	N	Railcar	N/A	

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1.6. Facility Contacts

EMERGENCY CONTACTS

Emergency contact information for this terminal is noted on the *Emergency Contacts - Red Tab* page at the front of this plan.

ADMINISTRATIVE CONTACTS

This list is a list intended to provide contact numbers necessary for plan administration and maintenance.

Facility Name	Fort Lauderdale TRANSFLO
Address	890 SW 21st Ave
	Fort Lauderdale FL 33312
Phone:	(954) 584-3111
County:	Broward

Ownership of Facility	TRANSFLO Terminal Services
Address	500 Water Street, J975
	Jacksonville, Florida 32202
Phone:	904-359-1323
Fax:	904-245-2257
TRANSFLO Emergency Number:	866-TRANSFLO (866-872-6735)
Contact:	Jan Barnes, Director HSE&Q

Operator of Facility	Arrow Material Services, LLC	
Address	2605 Nicholson Road / Suite 5200	
	Sewickley, PA 15143	
Phone:	724-544-0547 Gregg McDanel	
	412-639-9544 Dave Busch	
Contact:	Gregg McDanel	
	Secondary: Dave Busch	

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1.7. Authorization for Necessary Resources

I hereby authorize the emergency coordinators at this facility to commit the necessary resources in order to prevent and minimize harm to human health, the environment, and property in the event of an emergency at the facility.

Jan Barnes	2/19/18
Jan Barnes Director-HS&E and Quality TRANSFLO Terminal Services	Date

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2. EMERGENCY RESPONSE PROCEDURES

EMERGENCY COORDINATORS

In the event of an emergency, the Terminal Manager and Regional Manager are empowered to act as the Emergency Coordinators (EC).

There will be an Emergency Coordinator available (either on the premises or on call) at ALL times. Key Terminal personnel are noted on the **Emergency Contacts RED TAB** page.

COMMUNICATIONS CLERK

In the event of an emergency, the Terminal Manager and Regional Manager are empowered to act as the Communications Clerk (CC).

EMERGENCY OPERATIONS CENTER (EOC)

The terminal office will serve as the emergency operations center (EOC) for any emergency affecting the terminal. If the office is untenable due to fire, vapor release or terminal evacuation a temporary EOC will be established off-site at the gathering point.

If an off-site EOC is established, the Emergency Coordinator will take the following material with them to ensure continuity of communications and response:

- 1. Copy of this Emergency Action Plan,
- 2. Copy of facility SDS book,
- 3. Customer contact list,
- 4. Means of communication (cellular telephone, terminal portable radio),
- 5. Terminal roster of on-duty personnel and visitor sign-in sheet for personnel accountability at the gathering point in the event of an evacuation.

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2.1. FACILITY EMERGENCY NOTIFICATION CODE SYSTEM

The terminal uses portable radios for normal operating communications. These radios operate on a designated private frequency. The terminal emergency notification system will use these portable radios for notification of both initial emergency on the terminal and personnel notification of emergency type. Prior to being allowed on the terminal yard, all employees, contractors and visitors will be provided with a safety briefing, which includes this notification system and incident coding.

Employees are trained and will receive periodic re-training on incident reporting and the notification code system. Records of this training will be maintained as part of the terminal safety training procedures.

CODE RED	Immediately Evacuate	Shut down all equipment and all personnel assemble at exit(s)
CODE YELLOW	Spill Response	Every available and trained person respond to given location of incident
CODE BLUE	Fire	Telephone 911
CODE GREEN	Personal Injury	Closest person respond to given incident location, contact Terminal Manager
CODE GRAY	Active Shooter	Determine the most reasonable way for protection (Evacuate / Hide Out / Disrupt Shooter).
CODE WHITE	Clear	Incident End, back to normal

Incident Termination: The Emergency Coordinator has the sole authority and responsibility to sound the all clear based upon incident conditions, local responders or other authority.

Upon notification or realization of an emergency condition, the Emergency Coordinator will use the appropriate action guides to take protective actions and notifications to necessary off-site resources and internal chain of command contacts, see Figure 1. The Operations Manager will complete notifications to State and Federal agencies. Refer to Incident Response Procedures and Emergency Contacts – Red Tab for further details.

During ANY emergency condition, the Emergency Coordinator's actions must be based upon the following decision factors:

1. Protection of life, health, and safety of terminal employees, contractors, visitor and the general public.

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- 2. Protection of the environment including surface water, air, and land receptors.
- 3. Protection of property, equipment, and customer products.
- 4. System and business restoration.

In no case will business restoration take priority over the protection of human health and safety, the environment or property protection.

The terminal will use the color code reporting system for internal communications only. Any communications for incident notification, agency reporting or other external communications will use "plain language" format with the type of emergency reported as a spill, fire, medical emergency etc. to the external agency or department.

If the Emergency Coordinator judges that, the threat may extend to outside the facility, the Emergency Coordinator will notify, or cause to be notified, the proper authorities for evacuation (Emergency Services). Only the proper emergency services (Police and Fire Departments - 911) will direct evacuation of persons outside this facility.

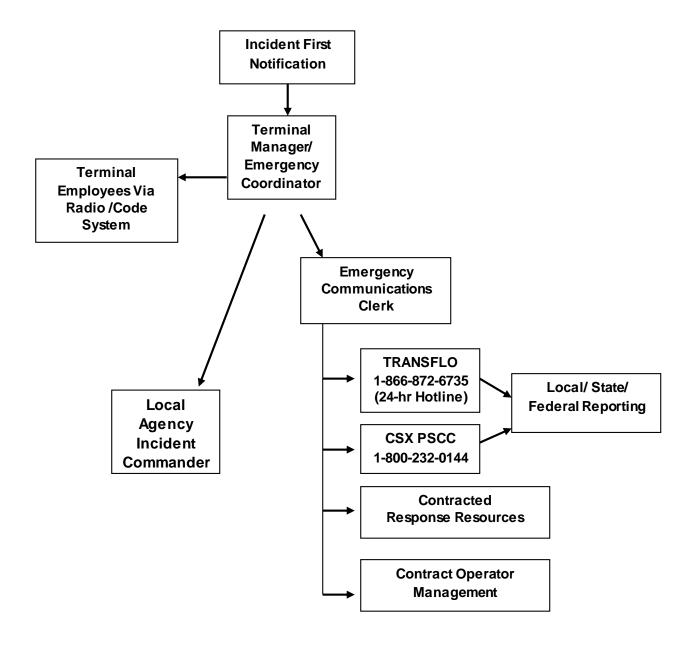
Upon hearing a General Alarm of CODE RED, all office, yard and shop personnel will do the following unless otherwise instructed by the Emergency Coordinator or his/her designee:

- A. Shut down all on-going systems (valves, motors, pumps, etc.) if safe to do so without risk to the employee.
- B. Clear aisles and drives for emergency traffic/vehicles
- **C.** Report to the assembly area. **AT TERMINAL FRONT GATE**
- D. The Emergency Coordinator will ensure that all persons and personnel, outside vendors, and visitors are present and accounted for.
- E. If persons are unaccounted for the EC/Terminal Manager will inform arriving emergency responders of the last known location of the missing persons.

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Figure 1: Communications Flow Chart

Refer to Incident Response Procedures and Emergency Contacts – Red Tab for contact information.



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2.2. MEDIA INTERACTION

No person at the facility is authorized to speak with or respond to the media when this plan is enacted. All inquiries by the media shall be referred to the following office with CSX Transportation:

Corporate Communications Office 500 Water Street Jacksonville, Florida 32202

Phone:

Business Hours: (904) 366-2949 Non-Business Hours: (904) 359-1234

The only appropriate response to the media is as follows:

"No one at this facility, including myself, is authorized to respond to a media inquiry. Any request for information should be addressed to the Corporate Communications Office of CSX Transportation." The address and phone number for that person is:

Corporate Communications Office 500 Water Street Jacksonville, FL 32202

Business Hours: (904) 366-2949 Non-Business Hours: (904) 359-1234

The security forces at the facility should be in charge to keep all spectators, including the media, at a safe distance.

Unless specifically authorized by the Corporate Communications Office at CSXT (or designee), at no time will the media be allowed on the facility property, to take photographs, video or audio recordings. If the media requests to take photographs, video or audio recordings, they may only do so if the Corporate Communications Office for CSXT specifically permits and controls the media.

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2.3. MEDICAL EMERGENCY: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

STEP 1: Notify Emergency Coordinator via radio or in person.

STEP 2: Emergency Coordinator sounds appropriate Emergency Code throughout the terminal.

CODE: GREEN

STEP 3: EC requests trained Terminal First Aid/CPR personnel to assess and assist injured (if applicable).

The administering of First Aid/CPR is strictly voluntary "good Samaritan." Any person administering First Aid/CPR on a voluntary basis should use follow Universal Precautions to avoid contact with blood or other fluids. Any employee who feels that they may have come in contact with blood or other potentially infectious material will accompany the injured to the clinic or hospital for treatment and/or evaluation.

- **STEP 4:** The personnel assisting injured communicates to EC on the condition and need for outside assistance.
- STEP 5: If injury is due to chemical exposure injured/exposed employee should be placed under emergency safety shower for a minimum of 15 minutes.

Clothing, tools, equipment and safety shower water should be contained on site. Contaminated materials and water must be decontaminated or disposed of properly. A plan to safely handle these materials will be developed after the injured employee has been transported to medical facilities.

STEP 6: EC notifies outside assistance, if necessary for medical transport OR injured is transported to nearest medical terminal if injury does not require ambulance transport. If there is any doubt about the seriousness of any injury default to using local EMS services.

NOTE: If injury involves exposure to chemical products a copy of the SDS must accompany the injured person to the medical terminal.

- **STEP 7**: EC notifies family or employee's company.
- **STEP 8:** EC contacts TRANSFLO headquarters to report incident.
- **STEP 9:** Contact the approved spill contractor for handling of wash water and other contaminated materials.
- **STEP 10:** EC completes initial injury/accident report and begins investigations as per operating company / TRANSFLO incident investigation process before resuming operation or use of equipment involved in the injury.

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2.4. FIRE / EXPLOSIONS EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

STEP 1: Incident occurs and fire/explosion results.

NOTE: Employees are required to make notification of any fire event BEFORE attempting to use handheld portable fire extinguishers. Notification MUST not be delayed due to attempts to control the fire.

No employee or contract operator personnel are expected or required to attempt to control a fire if there is any risk to their safety.

No one should attempt to fight any fire unless the fuel source or source of release can be controlled.

STEP 2: Terminal office is notified via radio or in person. The initial report should include:

- 1 Location of fire.
- 2 If fire is the result of a release (liquid or vapor) including product name
- 3 Volume spilled or rate of release if known
- 4 If release is controlled or ongoing.
- 5 Terminal equipment or tank cars that are involved or impinged by the fire.

The Emergency Coordinator (EC) is determined.

STEP3: EC sounds the appropriate Emergency Warning - **CODE BLUE** throughout the terminal.

ALL TRANSFERS MUST BE STOPPED UNTIL NOTIFIED BY TERMINAL MANAGER.

The warning should include type and location of the fire.

STEP 4: EC assesses extent of emergency.

- Direct personnel to appropriately respond, OR
- Direct evacuation and account for all personnel

STEP 5: EC makes outside Responder Notification (911) to obtain assistance in emergency and

makes other necessary calls to sensitive receptors, as required.

STEP 6: Provide first aid or other assistance to injured persons.

STEP 7: Take steps to direct emergency responders to location of fire.

STEP 8: Secure perimeter during response. If necessary, obtain security by contacting PSCC or

911.

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STEP 9: Monitor situation, providing updates to TRANSFLO Headquarters.

STEP 10: Monitor situation, providing updates to Operations Manager for required state and

federal release/spill reporting.

STEP 11: Contact customer(s) affected.

STEP 12: End of Incident.

STEP 13: Prior to resumption of any transfer operation, any safety equipment used in an

emergency will be cleaned or replaced and returned to a state of readiness.

STEP 14: Conduct investigation.

STEP 15: Terminal Manager completes incident report.

STEP 16: Corrective Action Review - Using established operator incident conference call process.

STEP 17: Complete remediation of any spilled materials and assure proper disposal of wastes.

All soil, debris, wastes, and liquids resulting from the release must be treated as Hazardous Waste until testing determines the waste to be non-hazardous. Any hazardous waste must be removed in accordance with Federal, State and Local laws. No waste should be removed without the knowledge and consent of the Emergency Coordinator.

Residues from fires or leaks will be solidified with appropriate inert absorbent and placed in appropriate DOT approved containers for transportation by an authorized disposal firm to permitted disposal facilities. Pumps, absorbents, and salvage containers are to be maintained at the facility for these purposes.

Contact TRANSFLO Manager HSE&Q for additional support.

Note: Terminal personnel routinely handle all of the products within the terminal while performing product transfers. However, large spills may expose employees to potential

exposure levels above available personal protective clothing.

The terminal is equipped with portable A/B/C fire extinguishers and employees receive

documented annual fire extinguisher training.

Employees are not trained, equipped, or qualified to act beyond their first response training to act as a fire brigade or team. Firefighting efforts that involve uncontrolled spills of flammable liquids, fires involving ordinary combustibles beyond the incipient stage or that require more than one fire extinguisher will require notification of the local fire department in a timely manner.

Delay in notification will result in a larger fire and possible injury to terminal personnel.

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In no case will the EC direct or allow employees to perform spill containment, fire suppression, clean up or offensive leak control beyond their training or PPE capability. Only properly equipped and trained responders will be used for these activities.

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2.5. LIQUID SPILL: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

STEP 1: Incident occurs and spill results.

STEP 2: Terminal office is notified via radio or in person. The initial report should include:

- 1. Location of release
- 2. Type of release (liquid or vapor) and product name
- 3. Volume spilled or rate of release if known
- 4. If release is controlled or ongoing.

STEP3: EC sounds the Spill Warning Code - CODE YELLOW throughout the terminal.

ALL TRANSFERS MUST BE STOPPED UNTIL NOTIFIED BY TERMINAL MANAGER.

The warning should include type and location of release and the amount of product spilled/leaked. Make note of wind direction surrounding sensitive receptors may be affected.

STEP 4: EC assesses extent of emergency.

Determine quantity of released material and if release is controlled. Ensure automated valves are closed. Based on incident conditions:

If spill is controlled, direct personnel to appropriately respond -move to Step 8

or

If spill is not controlled, direct Evacuation and account for all personnelmove to Step 5

STEP 5: After release is assessed, and the spill <u>CANNOT</u> be contained the EC makes outside Responder Notification to obtain assistance (Fire/Rescue - 911).

<u>During notification, include the product spilled, the amount of product released and if release is under control or uncontrolled.</u>

STEP 6: If evacuation is necessary, EC to sound the Terminal Evacuation Warning Code - CODE RED to alert personnel to evacuate terminal and prepare to meet emergency responders and assistance as needed.

STEP 7: Upon evacuation from the terminal take steps to account for all employees, visitors and contractors. Report any missing persons and last known location to first responders.

STEP8: EC requests trained personnel to respond to spill location.

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STEP 9: If spill <u>CAN</u> be contained EC will determine extent of spill and determine affect upon continued operations.

Resumption of operations must not take precedence over safety of terminal and control of spilled or released vapors.

STEP 10: Terminal employees may take defensive actions to control release and mitigate spilled product up to their level of training and PPE.

- Ensure all drains are covered
- Locate nearest spill kit and implement spill response procedures
- Use absorbents and pads to collect and contain the spill.
- > Utilize tractor with bucket if available.

STEP 11: Notify TRANSFLO and Operator management

STEP12: Terminal Manager/EC to coordinate product recovery and continued operation with TRANSFLO, operator management and others as needed.

STEP 13: Make notifications to state and federal agencies as required.

STEP 14: EC determines condition and safety of terminal for re-entry/restart.

STEP 15: Prior to resumption of any transfer operation, any safety equipment used in an emergency will be cleaned or replaced and returned to a state of readiness.

STEP 16: Make notification to customer(s) affected.

STEP 17: End of incident.

STEP 18: Conduct investigation.

STEP 19: Terminal Manager completes incident report. If agencies were notified, additional written reports may be required.

If hazmat chemical — DOT 5800 report may be required. Consult with Operations Management or TRANSFLO for further guidance.

STEP 20: Corrective Action Review - Using established operator incident conference call process.

STEP 21: Complete remediation or any spilled materials and assure proper disposal of wastes.

All soil, debris, wastes, and liquids resulting from the release must be treated as Hazardous Waste until testing determines the waste to be non-hazardous. Any hazardous waste must be removed in accordance to Federal, State and Local laws. No

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waste should be removed without the knowledge and consent of the Emergency Coordinator.

Residues from fires or leaks will be solidified with appropriate inert absorbent and placed in appropriate DOT approved containers for transportation by an authorized disposal firm to permitted disposal facilities. Pumps, absorbents, and salvage containers are to be maintained at the facility for these purposes.

Note:

Terminal personnel routinely handle all of the products within the terminal while performing product transfers; however, large spills may expose employees to potential exposure levels above available personal protective clothing.

In no case will the EC direct or allow employees to perform spill containment, fire suppression, clean up or offensive leak control beyond their training or PPE capability. Only properly equipped and trained responders will be used for these activities.

If <u>any</u> spilled material reached storm drains or drainage areas, additional reporting will be necessary immediately. Contact TRANSFLO HSE&Q or Operator management for additional instruction.

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2.6. VAPOR RELEASE: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

STEP 1: Incident occurs and vapor release results.

STEP 2: Terminal office is notified via radio or in person. The Emergency Coordinator (EC) is

determined.

STEP3: EC sounds the appropriate Emergency Warning or Code throughout the terminal and

contacts the neighboring businesses to advise of emergency.

ALL TRANSFERS MUST BE STOPPED UNTIL NOTIFIED BY THE ALL CLEAR SIGNAL.

The warning should include type of vapor released, if known, location of the release and current wind direction.

STEP 4: EC assesses extent of emergency.

Determine quantity of released material and if release is controlled. Ensure automated valves are closed. Based on incident conditions:

➤ If spill <u>IS CONTROLLED</u>, direct personnel to appropriately respond -move to Step 8

or

If spill is <u>NOT CONTROLLED</u>, direct Evacuation and account for all personnel-move to Step 5

STEP 5: After release is assessed, and the release <u>CANNOT</u> be contained the EC makes outside Responder Notification to obtain assistance (Fire/Rescue - 911) and makes other necessary calls to sensitive receptors, as required.

<u>During notification, include the product spilled, the amount of product released and if</u> release is under control or uncontrolled.

STEP 6: If evacuation is necessary, EC to sound the Terminal Evacuation Warning Code - CODE

RED to alert personnel to evacuate terminal and prepare to meet emergency

responders and assistance as needed.

STEP7: Upon evacuation from the terminal take steps to account for all employees, visitors and

contractors. Report any missing persons and last known location to first responders.

STEP 8: EC requests trained personnel to respond to spill location.

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STEP 9: Secure perimeter during response. If necessary, obtain security by contacting PSCC or 911.

STEP 10: Monitor situation and make notifications: provide updates to Operations Manager for

required state and federal release/spill reporting; notify customer(s) affected.

STEP 11: End of Incident

STEP 12: Prior to resumption of any transfer operation, any safety equipment used in an emergency will be cleaned or replaced and returned to a state of readiness.

STEP 13: Conduct investigation

STEP 14: Terminal Manager completes incident report. If agencies were notified, additional

written reports may be required.

If hazmat chemical – DOT 5800 report may be required. Consult with Operations

Management or TRANSFLO for further guidance.

STEP 15: Corrective Action Review - Using established operator incident conference call process.

STEP 16: Complete remediation of any spilled materials and assure proper disposal of wastes.

All soil, debris, wastes, and liquids resulting from the release must be treated as Hazardous Waste until testing determines the waste to be non-hazardous. Any hazardous waste must be removed in accordance to Federal, State and Local laws. No waste should be removed without the knowledge and consent of the Emergency Coordinator.

Residues from fires or leaks will be solidified with appropriate inert absorbent and placed in appropriate DOT approved containers for transportation by an authorized disposal firm to permitted disposal facilities. Pumps, absorbents, and salvage containers are to be maintained at the facility for these purposes.

Note: While terminal personnel routinely handle all of the products within the terminal while performing product transfers, large spills may expose employees to potential exposure levels above available personal protective clothing.

In no case will the EC direct or allow employees to perform spill containment, fire suppression, clean up or offensive leak control beyond their training or PPE capability.

Only properly equipped and trained responders will be used for these activities.

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2.7. HURRICANE AND TROPICAL STORM: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

During Hurricane season (June-November) be aware of Hurricane advisories for Hurricane watches and warnings. CSX and TRANSFLO actively monitor the potential tracking areas of all tropical storms and hurricanes. Storm tracking and evacuation determinations will be coordinated CSXT. TRANSFLO will communicate immediately with any terminal affected by a storm's projected path and assist with response procedures.

HURRICANE WATCH ISSUED

STEP 1: When a hurricane watch is issued, an Emergency Coordinator (EC) will be determined.

STEP 2: The EC will sound appropriate warning.

STEP3: Stay tuned to CSX system broadcasts and outside weather broadcasts, such as a NOAA

Weather Radio, or television for additional advisories.

SkyWatch warnings are posted on MapCSX website available through the CSX intranet.

STEP 4: EC makes appropriate contacts for community emergency response.

STEP 5: EC contacts operator and TRANSFLO Headquarters.

STEP 6: The facility will prepare for shutdown procedures and evacuation, in case it is advised.

See steps for Hurricane Warning.

HURRICANE WARNING ISSUED

STEP 1: When a HURRICANE WARNING is issued, a hurricane is imminent in 24 hours. An EC will be determined if the warning was ungraded from a Hurricane Watch, an EC was already.

be determined. If the warning was upgraded from a Hurricane Watch, an EC was already

established.

STEP 2: The EC will sound appropriate warning and facility shutdown procedures are initialized

to include:

All transfers terminated and railcars and truck trailers secured.

Transfer equipment moved to central, protected location if possible.

All power outlets shut off at the outbox.

Steam systems safely shutdown.

Surface water drains open.

Computer equipment moved away from windows or protected with plastic

covers.

Storm shutters or window covers applied if available (tape on windows is

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ineffective).
TRANSFLO headquarters will assist with notifications of terminal customers

STEP 3: EC contacts appropriate agencies for community emergency response.

STEP 4: EC contacts appropriate owner and operator chain of command to report terminal status and further protective action.

STEP 5: Secure facility records, computers, and other important office documents for storage or for a move to another location.

STEP 6: Secure facility equipment, structures and above ground storage tanks.

STEP7: Evacuate trailers to more secure permanent terminal structures.

STEP 8: Evacuate terminal immediately, if advised by local authorities.

STEP 9: After storm has passed and it is safe to do so, complete a report describing property and equipment damage, customer product damage or possible contaminations, theft of TRANSFLO equipment or other loss and damages.

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STEP 1:

2.8. SEVERE WEATHER: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

Terminal management must maintain a watch on current and projected weather conditions as part of normal terminal operations. In the event of severe rain storms or local lightning storms the terminal should be secured. A Severe Weather incident may include tornados, lightning storms, flash floods, etc.

WEATHER WATCH ISSUED

STEP 1:	When a WEATHER WATCH is issued, an Emergency Coordinator (EC) will be determined.
STEP 2:	The EC sounds appropriate warning.
STEP3:	Spotters are to look for approaching storms.
STEP 4:	The EC is to be tuned to broadcasts, such as a NOAA Weather Radio, or television for additional advisories.
STEP5:	EC makes appropriate contacts for community emergency response.
STEP 6:	EC contacts headquarters, providing updates to TRANSFLO Headquarters.
STEP 7:	Personnel may need to take shelter in predetermined shelter area on site or a shelter

WEATHER WARNING ISSUED

When a WEATHER WARNING is issued, a tornado has been sighted in the area and/or is

nearby. See steps for Weather Warning.

	indicated by radar.
STEP 2:	The EC will sound appropriate warning and personnel will take shelter onsite immediately.

STEP3: After storm has passed and it is safe to do so, complete a report describing property and equipment damage, customer product damage or possible contaminations, theft of TRANSFLO equipment or other loss and damages.

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2.9. SECURITY / BREAK IN: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

AFTER HOURS SECURITY INCIDENT

STEP 1: A security breach has occurred. Security Monitor contacts the security system alarms OR terminal personnel. The person of contact goes to the Terminal Gate to await police.

STEP 2: After police arrive personnel wait outside terminal until clear.

STEP 3: If police do not arrive, call police from phone outside of the terminal.

DO NOT GO INTO THE TERMINAL UNLESS IT HAS BEEN CLEARED BY THE POLICE

STEP 4: Once the police have cleared the terminal:

Secure the areaReset the alarm

Call Security Monitor

STEP5: Complete a report describing security breach to include property and equipment damage, customer product damage or possible contaminations, theft of TRANSFLO equipment or other loss and damages.

SUSPICIOUS ACTIVITY DURING BUSINESS HOURS

STEP 1: Ask the person to identify themselves and their purpose IF SAFE TO DO SO. If you sense confronting a stranger might do you harm, contact local police.

STEP 2: After police arrive, meet with police to provide details of the activity, where and when the activity took place and a description of person(s).

STEP 3: Notify CSX Public Safety Communications Center (PSCC) to report the incident.

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2.10. BOMB THREAT / TERRORISM THREAT: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

STEP 1: Terminal receives a bomb or terrorist threat via telephone, fax, or letter.

ALL THREATS MUST BE CONSIDERED AS CREDIBLE THREATS.

Be calm and courteous. Listen very carefully and do not interrupt the caller. If possible, alert other office personnel to call local authorities on another line.

Try to get the EXACT wording of the threat. Make notes of the following:

- Caller age estimate (adult or child)
- Caller sex (male or female)
- If an organization is mentioned

Bomb facts:

- When will bomb detonate?
 - Where is bomb located?
 - What does bomb look like
 - What kind of bomb

Does caller seem familiar with the terminal locations or products?

Voice characteristics (loud, fast, nasal, raspy)

Any accent (local, foreign)

Speech (fast, slow, incoherent, slurred)

Background noise (voices, music, animals, party, street traffic, airplanes)

- **STEP 2:** EC notifies PSCC of the threat. PSCC may instruct the EC on further actions and coordinate additional notification.
- **STEP3:** EC sounds the appropriate Emergency Warning or Code throughout the terminal and contacts the neighboring businesses to advise of emergency.
- STEP 4: The facility EC will brief arriving police of the threat that was received and provide as many details as possible. Make notes if possible. Assist law enforcement official with information on the facility, products, and resources. Provide any of the above call details you can remember or your notes.

DO NOT GO INTO THE TERMINAL UNLESS IT HAS BEEN CLEARED BY THE POLICE

- **STEP 5:** Monitor situation in case threat was real and/or escalates.
- **STEP 6:** Make notifications to TRANSFLO and Operator headquarters.
- **STEP 7:** Once the police have cleared the terminal:

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- > Brief all employees on the incident and safe terminal status
- ➤ Inspect any partial transfers for safe restart
- > Resume normal terminal operations

STEP 8: Complete a report describing threat to include property and equipment damage, customer product damage or possible contaminations, theft of TRANSFLO equipment or other loss and damages.

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2.11. ACTIVE SHOOTER: EMERGENCY RESPONSE PROCEDURES

REFER TO RED TAB PAGE FOR EMERGENCY CONTACTS

An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearms(s) and there is no pattern or method to their selection of victims. Active shooter situations are unpredictable and evolve quickly. Typically, the immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims. Because active shooter situations are often over within 10 to 15 minutes; before law enforcement arrives on the scene. Individuals must be prepared both mentally and physically to deal with an active shooter situation.

HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

Quickly determine the most reasonable way to protect your own life. Remember that customers and clients are likely to follow the lead of employees and managers during an active shooter situation.

STEP 1. Evacuate

If there is an accessible escape path, attempt to evacuate the premises.

Be sure to:

- Have an escape route and plan in mind
- Evacuate regardless of whether others agree to follow
- Leave your belongings behind
- Help others escape, if possible
- Prevent individuals from entering area where the active shooter may be
- Keep your hands visible
- Follow the instructions of any police officers
- Do not attempt to move wounded people
- Call 911 when you are safe

STEP 2. Hide Out

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you.

Your hiding place should:

- Be out of the active shooter's view
- Provide protection if shots are fired in your direction

(i.e., an office with a closed and locked door)

• Not trap you or restrict your options for movement

To prevent an active shooter from entering your hiding place:

- Lock the door
- Blockade the door with heavy furniture

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STEP 3. If Active Shooter is in Immediate Area

If the active shooter is nearby:

- Lock the door
- Silence your cell phone and/or pager
- Turn off any source of noise (i.e., radios, televisions)
- Hide behind large items (i.e., cabinets, desks)
- Remain quiet

If evacuation and hiding out are not possible:

- Remain calm
- Dial 911, if possible, to alert police to the active shooter's location
- If you cannot speak, leave the line open for the dispatcher to listen

Take action against the active shooter **as a last resort, and only when your life is in imminent** danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her
- Throwing items and improvising weapons
- Yelling
- Committing to your actions

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3. RECOVERY/MITIGATION - POST INCIDENT ACTIVITY

3.1. TERMINAL EVACUATION – RE-ENTRY

After any event that results in the evacuation of the terminal, a formal terminal re-entry process will be conducted.

This process includes a careful inspection of all tank cars connected to transfer equipment. All connected tank cars need to be checked for the status of all valves.

An inventory check may need to be conducted to determine how much product was off loaded prior to the system shutdown and evacuation and how much product remains to be offloaded.

If the shutdown was the result of a product spill, vapor release or fire the system must remain out of service until the condition and operability of the transfer equipment is determined by TRANSFLO management. Re-entry into the terminal from these events is also based upon the local emergency response officials releasing the terminal for TRANSFLO and/or Contract Operator entry.

3.2. REQUIRED REPORTS – WRITTEN NOTIFICATION

Within 24 hours of the incident, an initial written report will be forwarded to TRANSFLO and will be distributed internally within ten (10) days after an incident necessitating the implementation of the Emergency Action Plan. The Emergency Coordinator shall submit a written summary of the incident to Operator management and the TRANSFLO.

Written reports will be filed to State and Federal government agencies as required. The required reports for this site are to be made to:

- TRANSFLO Regional Operational Manager (ROM)
- Regional Operations Manager
- Senior HS&E Director

Copies of the report will be maintained with the facility operating record. The report shall include:

- A. Name, Address, and Telephone number of the terminal operator.
- B. Name, Address, and Telephone number of the facility.
- C. Date, Time and Type of incident (for example; fire, spill, explosion, etc.).
- D. Name and quantity of materials involved.
- E. Extent of injuries, if any.
- F. An assessment of actual or potential hazards to human health or the environment, where applicable.

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- G. Estimated quantity and disposition of recovered material that resulted from the incident.
- H. A report of all notifications that were made including who was called, time of calls, and any other information obtained or derived from the notification calls.

3.3. POST INCIDENT REVIEW AND MODIFICATION PROCESS

After all response and mitigation activities have been completed, the terminal and associated owner/operator management should complete an incident response review to identify elements of the response system that fail, were ineffective, or worked well.

Key baseline rules for any review:

- A. To be effective as learning tools, reviews must be honest.
- B. A clear review of the facts leading to the incident must be established.
- C. A step-by-step review of response actions or timeline should be established.
- D. Critical control points such as incident discovery, reporting, communication /notification and response activities need to be identified and measured for timeliness, completeness, and effectiveness.
- E. Critical control points that were not effective should be flagged for review and modification as necessary.
- F. Corrective action plans and responsibility for implementing corrective action are established and tracked until completed.
- G. Applicability to other terminals or facilities should be identified and implement.

All participant interaction must be done to find ways to make improvements, not to find fault or blame those persons who performed incident management roles.

3.4. MITIGATION

Recovery of spilled product may be conducted by outside remediation companies. These activities will be planned and an Incident Site Safety Plan (ISSP) developed prior to work commencing.

Only qualified and TRANSFLO/CSX approved response/remediation contractors will be permitted to work in the terminal. These contractors must meet TRANSFLO security requirements and obtain necessary security clearance prior to beginning response activities. TRANSFLO/CSX and State approved clean up contractors are listed on the **Emergency Contacts Red Tab** page.

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4. BUSINESS CONTINUITY PLAN

In instances when the terminal has been evacuated for any emergency response scenario, it may be necessary to implement this Business Continuity Plan in order to return to perform normal terminal functions.

Refer to TRANSFLO Gateway and TRANSFLO ROM for further guidance.

The following items are addressed:

Alternative Power Supply

Alternative Scale Location

Alternative Air Compressor

Security Providers

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APPENDIX A: EMERGENCY EQUIPMENT

The following is a list of emergency equipment maintained by this facility. Locations of equipment are noted. A site plan located in Figure 1 identifies all major buildings at the facility. Any response equipment that is utilized in an emergency must be replenished as quickly as possible.

A. <u>Personal Protective Equipment</u>

Employees are trained to First Responder – Operations Level at a minimum.

The personal protective equipment used at this facility is:

- Chemical protective clothing (compatible with products handled in the terminal)
- Hard hats
- Goggles and face shields
- Hearing protection
- Chemical resistant gloves
- Chemical resistant steel toed boots

B. Facility Spill and Response Materials

- Windsocks at several locations in terminal
- Safety Data Sheet Book(s)
- Chemical Inventory list
- Emergency Response information lock box located to be accessible to emergency responders (weatherproof). Lock box will contain:
- Copy of this document
- Site plan
- TRANSFLO computer located in the office.

C. First Aid Kit(s)

• To provide care for sick or injured personnel prior to transportation for treatment (if required). First Aid Kit(s) can be found in the Office of the facility.

D. Non-sparking bung wrench and 36" pipe wrench

• To open and close the bungs and vents common to most drums. Bung wrenches or a 36" non-sparking pipe wrench can be found in the garage/shed area.

E. Non-sparking synthetic brush brooms

• If cleaning up loose absorbents used on small spills.

F. Non sparking (plastic) grain/scoop shovel

• For clean up of loose absorbents used for small spills.

G. Oil Sorb

• To absorb spills. Oil sorb is located in:

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- o 85 Gallon over pack drums at several accessible locations in the terminal
- Inside Garage/Shed area

H. Absorbent Pillows/Socks/Dikes/Sheets

- To create temporary dikes to retain and absorb any liquid commodity. Absorbent Pillows/Sock/Dikes are located:
- Inside Over pack Drums at several accessible locations in the terminal
- Inside garage/shed area

I. <u>85 Gallon Over pack Drums</u>

- To provide containment for absorbent used to contain spills. Over pack drums can be found:
 - At several accessible locations in the terminal

NOTE: Any drums used to contain or clean up spilled hazardous materials must be properly labeled with appropriate waste label, DOT warning label, product name, UN number (if applicable), date placed into container and fully sealed.

J. Fire Extinguishers (Dry Chemical)

- To provide protection against Class A, B, and C fires. Fire extinguishers are located:
 - Fixed Locations:
 - A. Shop various locations
 - B. Office- various locations
 - o All portable transfer equipment is equipped with portable fire extinguishers

K. Tractors with bucket and forklift capability

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APPENDIX B: EMPLOYEE EMERGENCY RESPONSIBILITIES

Incident Commander & Alternate:

- Conduct and document an annual exercise
- Communications systems checked monthly with documentation
- Training all employees with documentation of training. Including new employees or those with new responsibilities.

Terminal Employees:

- Know the initial action to be taken
- Track and maintain adequate stocks of response materials
- Check all safety showers daily
- Check all release containment devices monthly
- Know the evacuation routes and command post locations

First Responder (Terminal Employees):

- Will understand what to do when an unintentional release occurs
- Will manage response activities by other agencies
- Will maintain adequate stocks of response materials
- Will know the location of the command post
- Will know evacuation routes
- Will maintain portable eyewash unit
- Will participate in an annual emergency response exercise
- Will be available to respond during operations hours
- Will contact EMS or 911 in case of injury or potential for catastrophic release (potential to empty railcar or truck)

Operations Manager:

- Will ensure loaders are sufficiently trained to perform the transfer
- Will ensure that adequate stocks of response material are available
- Will contact appropriate agencies identified in Red Tab
- Will conduct post emergency review (documented timeline of events)
- Will initiate emergency response exercise at least annually
- Will contact the railroad as necessary
- Will ensure remediation is completed, this includes the disposal of wastes generated
- Will be available during routine operating hours
- Will be the primary point of contact with the First Responder
- Will report all findings to the Regional Manager within two workdays
- Will perform the functions of the Regional Manager in their absence
- Will ensure all necessary reporting (EPA, DOT, State & Local) is completed in the prescribed time
- Will be the primary contact for the First Responder

Regional Operations Manager:

- Will be able to be contacted during the normal operations hours
- Will perform the functions of the Manager in his/her absence
- Will contact the customer and primary contact for the customer

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Will participate in the annual emergency response exercise

Senior Vice President, Operations – Eastern Region:

- Will communicate all relative information to the company senior management
- Will assist in the post emergency review process
- Will participate in the emergency response exercise

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Appendix C: Facility Operating Personnel: Training Outline

All employees, who operate the TRANSFLO facilities, are trained according to the policies outlined below:

1. DOT

- a. HM-126C Hazardous Materials Worker
 - i. Hazard Awareness
 - ii. Safety Training
 - iii. Function Specific training

2. OSHA

- a. 29 CFR 1910.1200 Hazard Communication: Awareness:
 - i. What constitutes a hazardous commodity?
 - ii. What hazardous materials are handled at this terminal?
 - iii. How are each of these transferred?
 - iv. How is hazardous waste handled and disposed of?
 - v. Which chemicals/commodities are present at the terminal?
 - vi. How are materials identified by the placard?
 - vii. What are the hazards of the materials located at this facility?
 - viii. How to read a SDS (Safety Data Sheet)
- b. 29 CFR 1910.38 Emergency Action Plan:
 - i. Emergency Coordinators
 - ii. Implementation
 - iii. Emergency Response Procedures
 - iv. Emergency Equipment
 - v. Coordination Agreements
 - vi. Evacuation Plan
 - vii. Storage/treatment of spilled materials
 - viii. Incompatible Wastes
 - ix. General Alarms
 - x. Fire and Response Drills
- c. 29 CFR 1910.57 Fire Extinguishers:
 - i. Annual fire extinguisher training
- d. 29 CFR1910.120 Hazardous Waste Operations and Emergency Response:
 - i. Terminal employees are trained to the First Responder-Operations level only.

3. First Aid and CPR

4. RECORD KEEPING:

a. All training records must be kept on file and retained, both in the terminal records, and in the individual's training records.

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APPENDIX D: DEFINITIONS

Communications Clerk (CC):

That person designated to make notifications, manage communications with outside resources and agencies and to document response activities and notifications during an emergency.

Emergency Coordinator (EC):

That person designated to act in the event of an emergency to bring events under control, and to notify or cause to be notified the proper authorities. The Emergency Coordinator is empowered to commit all resources that are needed, including commitment of funds for outside help. The EC may also be referred to as the Incident Commander until relieved by outside response agencies or qualified persons in their chain of command.

Emergency Operations Center (EOC):

A location identified pre-emergency to serve as a communications, command, and control point during the emergency. This is the location where the EC and Communication clerk will manage the incident from and where outside responders and resources will stage during the emergency.

General Alarm:

A code spoken over the paging or terminal radio communication system, recognized by all personnel, to mean general alarm requiring immediate response. A General Alarm for this facility is:

CODE RED EVACUATE IMMEDIATELY

CODE YELLOW SPILL RESPONSE

CODE BLUE FIRE CODE GREEN INJURY

CODE GRAY ACTIVE SHOOTER

ENGINE ALERT RAILROAD ENGINE OPERATING WITHIN THE TERMINAL

FACILITY

Independent Operator:

An independent company which offers experience, knowledge, expertise management, and labor to operate a TRANSFLO facility.

TRANSFLO Regional Operations Manager (ROM)

A TRANSFLO manager charged with operational oversight of terminals in an assigned geographical area. The ROM is the senior TRANSFLO operational representative at TRANSFLO terminals.

Over Pack Drum:

A drum or drums which are large enough to hold an entire 55-gallon drum of material. The Over pack drums used at BIDS facilities are filled with various haz- sorb and spill containment and clean up materials and equipment.

Regional Operations Manager (ROM):

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An operator employee who oversees the operations of the various TRANSFLO terminals in a given geographic area or region. The ROM's function is to oversee that the terminals operate the TRANSFLO facilities in accordance with the standards set by the operator.

Reportable Quantity (RQ):

A quantity of material, which when spilled causes a legal requirement of the person in charge, to call the National Response Center. Different commodities will have different RQ's. See appropriate SDS (Safety Data Sheets) for RQ (reportable quantity) amounts.

Wind Sock:

A lightweight material, which is usually mounted to a pole for the purposes of determining direction and strength of the wind, for emergencies involving vapor releases.

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APPENDIX E: FIRST RESPONDER: IMPORTANT INFORMATION RECORD

Name:	Date/Time:
Telephone Numbers: Office (954) 584-3111	
Physical Location: 890 SW 21st Ave., Fort	Lauderdale FL 33312
Type of Incident: Medical Emergence	cyProduct Release Fire or Explosion
RailIncidentWeather_	Security Off-Site Chemical Release
Product Released:	
Quantity of Material Released:	
Potential Health/Environmental Hazards:	
Injuries, (Number and type) if any:	
Has Product Left the Site: YES / NO Li	quid/Vapor - Direction of travel:
REPORTING LOG:	
Local Fire/Rescue/Police Notification:	Time
PSCC Notification: Time	::
State/CountySpill Hotline Report:	Report#:
National Response Center:	Report#:
TRANSFLO ROM:	
TRANSFLO Headquarters:	

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APPENDIX F: USED OIL HANDLING OPERATIONS

Description: This terminal routinely handles used oil products in the form of used motor oil, wastewater with used oil, and vacuum sludge with used oil from various used oil collection companies. These materials typically arrive at the terminal by highway truck and are transferred into a railroad tank car. These products are transferred by use of the truck's vacuum system, truck pump or a portable used oil transfer pump unit.

Used Oil is classified as Hazardous Waste in Massachusetts and must be handled accordingly.

Regardless of the equipment used to transfer products, the following spill production measures shall be used:

- All transfers will be conducted by trained TRANSFLO terminal operator employees (shipper employees such as truck drivers may assist in the transfer under the direction of the terminal employee).
- All transfers will have a terminal employee in attendance during the entire operation.
- The terminal employee with the truck driver will conduct a job safety briefing before starting the transfer. This will include emergency shut off controls, terminal safety requirements and the capacity of the tank car and expected truck volume.
- Only hoses and fittings dedicated for used oil products will be used in the transfer of these products.
- The terminal employee prior to use and throughout the transfer to identify leaks will inspect all hoses, fittings, standpipes or other product handling equipment.
- Tank car will not be loaded via the tank car's bottom outlets. Only top loading of these products is authorized.
- Spill pans will be used under all hose and fitting connections.
- Any drains, storm sewer catch basins or other surface water drainage devices in the transfer area will be covered using drain covers or similar device during the transfer.
- Tank cars will be secured for transportation at the end of each day.
- Tank cars will be inspected upon arrival to identify tank car defects and before departure for proper securement. All tank car inspections will be documented and maintained at the terminal office.

If there is a spill, fire or other incident involving used oil materials, this Emergency Action Plan will be used to safely handle the release, mitigate the spill, and conduct an incident investigation

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