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Appendix G

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Oil Spill Response Plan

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SECTION SEVENTEEN - OIL SPILL RESPONSE PLAN

17.1 Introduction

This Oil Spill Response Plan (OSRP) has been prepared in support of the proposed SONGS 1 Intake and Discharge Conduit Dispositioning Project. The purpose of this OSRP is to present the procedures and protocols that will be utilized in the event of an onshore or offshore oil spill resulting from decommissioning activities.

Southern California Edison (SCE) is proposing to disposition the existing SONGS 1 intake and discharge conduits. Proposed dispositioning activities will include onshore and offshore operations involving cement plug installation, concrete structure removal, and installation of mammal grates.

17.2 Spill Definition – Minor and Major

For purposes of this OSRP, a minor spill is defined as 5 barrels or less and a major spill is defined as more than 5 barrels.

17.3 Potential Spill Sources

Potential spill sources of hydrocarbons are limited to leakage or spillage of fuel or lubricants from onshore and marine equipment used during dispositioning operations.

17.3.1 Marine Equipment Sources

A derrick barge, support boat, derrick barge tugboat, deck barge, deck barge tugboat, and crewboat may all be used on this project. The derrick barge, support boat, tugboats, and crewboat may all fuel or lubrication fluids in integral tankage built into the vessel's hulls. The derrick barge and support boat will have motorized equipment operating from their decks. While all vessels are considered potential spill sources, the likelihood of a spill is remote because a spill could only occur if the hull of a vessel is breached in the area of the tankage or if a vessel sinks.

In addition, implementation of the measures presented in Section 14 – Marine Safety Plan will further reduce the potential for collisions of project-related vessels with other area vessels in the shipping channel. All APC vessels involved will be constructed with multiple watertight compartments to isolate flooding and reduce the risk of sinking should a tank be punctured.

Another marine equipment source of hydrocarbon spillage at the site may be leakage or spillage of fuel or lubricants from the deck equipment used to support the marine

operations. Specifically, equipment items aboard the primary support vessels (e.g., compressors, generators, pumps, welding machines, etc.) have small-size, dedicated tanks containing fuel. To prevent such spillage, all deck equipment will be equipped with drip pans to contain fuel spillage or equipment leakage. Marine work crews will be directed to monitor the deck equipment for leakage and if observed, will cease equipment operation and correct any leakage that might occur. All hydrocarbon-based fluids stored onboard the work vessels will also be required to have a double containment system.

17.3.2 Onshore Equipment

The use of motorized terrestrial equipment during onshore dispositioning operations presents the potential for specific spill scenarios. These include the leakage of fuel, motor oil, or hydraulic fluid during operation, refueling, and equipment maintenance. All heavy equipment used during onshore operations will be restricted to maintained roadways and planned ingress and egress routes to and from the onshore work locations.

To prevent equipment leakage during operation, APC will require that all equipment used at the site be in good working condition and be inspected daily for leaks. Any equipment observed to be leaking while onsite will immediately be relocated to a designated equipment staging and refueling area for repair.

All equipment refueling will be conducted using Best Management Practices (BMPs) and will be performed in a manner best suitable to minimize the potential for fuel spillage.

17.4 Oil Spill Response Team

APC will maintain an onsite spill response team to handle minor spills during dispositioning activities. The onsite response team is responsible for reporting, containment, and clean up of any small spills using onsite equipment and procedures. The onsite team will be supervised by the APC Project Manager and consists of any and all qualified APC personnel working onsite at the time of the spill.

17.5 Onsite Response Equipment

The onsite spill response team will have access to an appropriate quantity of sorbent pads, an absorbent boom, and a containment boom, which will be maintained onsite during dispositioning activities. The tugboat or other support vessel will be utilized as a boom tender vessel, if necessary. In the event of a spill, the Project Manager will immediately cease project operations in order to deploy boom or apply sorbent pads. Table 17-1 lists the minimum onsite spill response equipment that will be maintained onsite for emergency response of miscellaneous spills.

Table 17-1. Onsite Spill Response Equipment Inventory

Quantity	Equipment Type
1	500-foot Absorbent Boom
200	3M Type 156 Sorbent Pads
100	Plastic Storage Bags
1,000 feet	Containment Boom

17.6 Notification

An important step in the response procedure is notification to others of an incident. Notification is essential to activate the response organizations, alert company management, obtain assistance and cooperation of agencies, mobilize resources, and comply with local, state, and federal regulations. The order of notification is based on the premise that those parties who can render assistance in controlling or minimizing the impacts of an incident should be notified before those that are remote from the incident. The notification process encompasses the following categories:

- Emergency Agency notification
- Company notification/onsite spill response team activation
- Cleanup contractors (if required)
- Notification of other interested parties
- Periodic progress updates and reports (if necessary)

17.6.1 Emergency Agency Notification

Table 17-2. Emergency Agency Notification Matrix

Type of Emergency	Agencies to be Notified	Telephone	Notification Criteria	Notification Time Frame	Information to Report
Oil Spill to Land or Marine Waters	California Office of Emergency Services	(800) 852-7550	All spills to land or water	Immediately	1. Location of release or threatened release 2. Qty released 3. Type of oil 4. Your name & phone number
	National Response Center	(800) 424-8802			
	USCG-San Diego Marine Safety Office	tbd			
	State Lands Commission	(562) 499-6312			
	California Department of Fish and Game/ OSPR	(888) 334-2258			

	California Coastal Commission	Ellen Faurot-Daniels, (415) 904-5285 (work) (415) 201-5792 (pager).			
	Oiled Wildlife Care Network	(530) 754-9035			
	Minerals Management Service	(805) 389-7775 or (805) 389-7550	Spill entering federal waters only		
Medical Emergencies	Fire Department/ Ambulance	911	Medical assistance and/or transport required	ASAP	<ol style="list-style-type: none"> 1. Type of injury 2. Location 3. Condition 4. Action taken 5. No. of victims
	CalOSHA	(415) 737-2932		As required	

USCG U.S. Coast Guard
OSPR Office of Oil Spill Prevention and Response
CalOSHA California Occupational Safety and Health Administration

The Lempert-Keene Seastrand Oil Spill Prevention and Response Act (SB 2040) requires notification of the California Office of Emergency Services when oil spills occur or threaten to occur from facilities, vessels, or pipelines into California marine waters. The California Code of Regulations implementing SB 2040 requires that the specific information shown in Table 17-3 be given to the agencies when making notifications.

Table 17-3. Information Checklist

Name of reporter. Facility name and location Date and time of the spill
Cause (if known -- don't speculate) and location of the spill Estimate of the volume of oil spilled and the volume at immediate risk of spillage Material spilled (e.g., crude oil), and any inhalation hazards or explosive vapor hazards, if known Prevailing sea conditions: <ul style="list-style-type: none"> • Wave height • Size and appearance of slick • Direction of slick movement • Speed of movement, if known Prevailing weather conditions: <ul style="list-style-type: none"> • Wind speed • Wind direction • Air temperature Measures taken or planned by personnel on scene <ul style="list-style-type: none"> • For containment • For cleanup Current condition of the facility Any casualties?

NOTE: When making reports, record the agency, name of person contacted, and the date and time of notification. Reporting of a spill shall NOT be delayed solely to gather all the information noted above.

All actions, including agency notification, should be recorded on the Event Log. A regulatory agency address directory is provided in Table 17-4.

Essential agency notifications are further assured by the California Office of Emergency Services and the National Response Center, since they will notify related state and federal agencies.

If a spill impacts navigable waters, notification of the National Response Center is mandatory and normally results in simultaneous notification of the U.S. Coast Guard. However, it is recommended that a call be made to the local U.S. Coast Guard office in San Diego at (____) ____-____.

Based on the spill trajectory analysis, if the spill is a threat to the shoreline, the appropriate fire department should also be contacted. This would not normally be an immediate notification.

Table 17-4. Addresses of Regulatory Agencies

<p>NATIONAL RESPONSE CENTER U.S. Coast Guard Headquarters 2100 Second Street SW Washington, D.C. 20593</p> <p>MINERALS MANAGEMENT SERVICE Pacific OCS Regional Office & Camarillo District Office 770 Paseo Camarillo Camarillo, CA 93010</p> <p>U.S. COAST GUARD MSO, San Diego</p> <p>U.S. DEPARTMENT OF TRANSPORTATION 111 Grand Avenue, P.O. Box 23660 Oakland, CA 94623</p> <p>NATIONAL MARINE FISHERIES SERVICE 650 Capital Mall Sacramento, CA 95814</p>	<p>CALIFORNIA DEPARTMENT OF FISH AND GAME Office of Spill Prevention and Response (OSPR) 1730 I Street PO Box 944209 Sacramento, CA 94244</p> <p>CALIFORNIA OFFICE OF EMERGENCY SERVICES 2800 Meadowview Road Sacramento, CA 95832</p> <p>CALIFORNIA DIVISION OF SAFETY AND HEALTH 1655 Mesa Verde Avenue, Room 150 Ventura, CA 93003</p> <p>CALIFORNIA STATE LANDS COMMISSION 330 Golden Shore, Suite 210 Long Beach, CA 90802</p> <p>CALIFORNIA COASTAL COMMISSION 45 Fremont, Suite 2000 San Francisco, CA 94105-2219</p>
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17.6.2 Company Notification

SCE requires that all emergencies be brought to the attention of SCE management. The SCE Qualified Individual will notify by radio or telephone appropriate SCE management with an initial assessment of the extent and nature of the spill, and will activate additional company resources if necessary.

QUALIFIED INDIVIDUAL

David Brevig	
Work:	949.368.7820
Cellular:	tbd
Home:	tbd

17.7 Marine Spill Scenarios and Response Procedures

17.7.1 Minor Marine Spills

This scenario consists of minor spillage of oil or oily water (less than 5 barrels) from a marine support vessel or deck equipment. Response will consist of deployment of an absorbent boom and sorbent pads that are stored on the primary offshore support vessel. A minimum of 500 feet of absorbent boom will be stored on the primary offshore support vessel. In addition, a containment boom will be deployed if necessary. Table 17-5 lists the response procedures for a minor marine spill.

Table 17-5. Minor Marine Oil Spill Response Procedures

Responsible Person	Action
Project Foreman - Contractor	<ul style="list-style-type: none"> • Assess the spill size and type of material spilled. • Take action to contain the spill and prevent further spillage. • Inform the Project Superintendent as soon as possible as to the source of the spill, type of material spilled and status of control operations. • Maintain surveillance of source and oil slick. • Assist the onsite response team in implementing clean up procedures including deployment of the absorbent and/or containment boom and sorbent pads and proper storage and disposal of oily debris and sorbent pads.
Project Foreman - Contractor	<ul style="list-style-type: none"> • Account for all personnel and ensure their safety. • Determine if there is a threat of fire or explosion. • If a threat of fire or explosion exists, suspend all control and/or response operations until the threat is eliminated. • Assess the spill situation to determine the status of response operations, estimate spill volume, estimate speed and direction of oil slick movement and determine resource needs. • Notify the Project Manager.
Project Manager –Contractor	<ul style="list-style-type: none"> • Mobilize the onsite oil spill response team. • Notify appropriate agencies including: <ul style="list-style-type: none"> – National Response Center (800) 424-8802 – California Office of Emergency Services (800) 852-7550 – State Lands Commission (562) 499-6312 – California Department of Fish and Game/OSPR (916) 445-0045 – U.S. Coast Guard Marine Safety Office (510) 437-2943 – Oil Wildlife Care Network (530) 754-9035 • Supervise response and clean up operations. • File written reports to appropriate agencies.

17.7.2 Major Marine Spills

For purposes of this OSRP, a major spill is defined as any spill greater than 5 barrels. There are no realistic spill sources, such as pipelines or oil wells, at this project site with the potential to generate a major oil spill.

17.8 Onshore Spill Scenarios and Response Procedures

17.8.1 Minor Onshore Spills

This scenario consists of minor spillage of fuel, oil, or hydraulic fluid from terrestrial equipment used to support the onshore decommissioning activities. Any fuel, motor oil, or hydraulic spills that occur when equipment is operating will be contained with appropriate containers and sorbent pads. Sorbent pads will be maintained at each onshore location where work is being performed.

17.8.2 Major Spills

There are no major spill sources at this onshore work site.

