Appendix G Oil Spill Response Plan

Appendix G

Cabrillo Power I LLC
Encina Marine Oil Terminal Decommissioning Project
Oil Spill Response Plan

June 2015

1.0 INTRODUCTION

This Oil Spill Response Plan (OSRP) has been prepared in support of the proposed Cabrillo Power I LLC Encina Marine Oil Terminal Decommissioning Project (Project). The Project consists of decommissioning the existing offshore Encina Power Station Marine Oil Terminal (MOT) and facilities using conventional equipment, vessels, methodologies, and procedures. The purpose of this OSRP is to present an overview of the measures incorporated into the Project design to minimize the potential for hydrocarbon release and to outline the procedures and protocols that would be utilized in the event of an onshore or offshore oil spill resulting from Project activities.

2.0 POTENTIAL SPILL SOURCES

Potential spill sources of hydrocarbons include releases from onshore and offshore equipment (including Project vessels) used during the decommissioning of the MOT facilities, accidental discharges from onshore fuel storage and refueling operations (if needed), and leakage from the pipeline during decommissioning operations. There are no other pipelines adjacent to the MOT that are considered a potential spill source.

2.1 ONSHORE EQUIPMENT

Equipment associated with onshore decommissioning activities includes excavators, backhoes, bulldozers, loaders, generators, air compressors, and welding machines, among other equipment. This equipment is primarily diesel-powered. The use of motorized terrestrial equipment for onshore and beach operations present opportunities for accidental hydrocarbon releases. These include leakage of fuel, motor oil, or hydraulic fluid during operation, refueling, and equipment maintenance. To prevent equipment leakage during construction, all equipment used at the site would be required to be in good working condition and would be inspected each day for leakage. Any equipment that is found to be leaking petroleum product while at the site would be immediately moved to the equipment staging and refueling area and shutdown, and the leaking fluids would be contained until the equipment is repaired. All equipment refueling and maintenance would take place at designated equipment staging areas which would provide additional protection against off-site migration of oil. In the event of a spill onshore, the contractor would take the appropriate action to clean up the spill. Specifically, on-site spill clean-up equipment, such as sorbent pads, booms, and temporary storage facilities shall be available at work sites during all onshore decommissioning activities. Additional resources, available through contracted services, would be available should on-site equipment be insufficient to recover and remove the spilled petroleum product.

2.2 OFFSHORE EQUIPMENT

Several offshore support vessels may be employed at the work site. One vessel would be a derrick barge (or possibly two; one work barge and one materials barge) with onboard

decommissioning equipment, including a diesel-driven crane and air compressors. Support vessels, including an anchor-handling tugboat and a crew boat would also be involved in the offshore operations. All of the vessels would have diesel fuel and/or gasoline and lubricants onboard. While all vessels are considered potential spill sources, the likelihood of a spill is remote because a spill could only occur if the vessel's hull is breached in the area of the fuel tank, if a storage container is spilled, or if a vessel sinks.

The derrick barge would have some equipment on board to conduct decommissioning activities; equipment will include a compressor, generator, anchor winch, and pump. The potential for a release from diesel-powered equipment onboard the vessel is minimal due to the small volume of fuel contained within each piece of equipment. Equipment that is used on a day-to-day basis would be monitored for leaks; if a leak is observed, the faulty equipment would cease operation and appropriate clean-up and corrective measures would be implemented. All barge equipment would have drip pans under them and sorbent pads would be available on the barge to clean-up minor hydrocarbon leaks from the deck equipment. All equipment refueling would be conducted to minimize the potential for fuel spillage. All hydrocarbon-based fluids stored onboard the vessels would be in appropriate containers and would include secondary containment structures.

2.3 PIPELINE LEAKS

The pipeline was flushed and pigged with a soft pig and brush when the MOT was placed into caretaker status; no surfactant was used. The pipeline segment is presently filled with water and Nalco EC6106A and is under vacuum. A mixture of approximately 385 gallons of preservative in 1,450 barrels of potable water was reportedly used to fill the pipeline.

Prior to decommissioning, the pipeline would be purged of the water and preservative to the onshore receiver location for disposal in preparation for removal activities. At this time, any unanticipated residual hydrocarbons that may still be in the pipeline would be removed, which would minimize the potential release of hydrocarbons from the pipeline during decommissioning.

3.0 OIL SPILL RESPONSE TEAM

Cabrillo and its contractors would maintain an onsite spill response team to handle minor spills (5 barrels or less) and provide initial response to major spills (more than 5 barrels) during Project activities. The onsite response team is responsible for reporting, containment, and clean-up of any minor spills using onsite equipment and procedures.

The onsite team would be supervised by the Onsite Project Manager (or other appointed supervisor) and consist of all qualified contractor personnel working onsite at the time of the spill. The Project Manager would request additional response personnel and equipment, if necessary.

Cabrillo has an existing contract with National Response Corporation (NRC) for in-water and onshore spill response for the Encina Power Station located at 4600 Carlsbad Boulevard, Carlsbad, California. NRC is a California State approved Oil Spill Response Organization (OSRO) and has been rated by the U.S. Coast Guard (USCG) as an OSRO meeting all classification ratings for rivers/canals, inland/nearshore and oceans environments, as well as shoreline response capabilities. Although not anticipated, if an offshore release occurs that is beyond the response capabilities of the designated onsite response team, NRC would provide additional assistance in the mechanical containment and recovery during an oil spill.

Table G-1. Emergency Oil Spill Response Contractors (Secondary Responders)

Contact Information	
National Response Corporation (NRC) Kelly Brandenburg, Regional Manager San Diego Office 2950 Kurtz Street San Diego, CA 92110 Phone: 619-235-3320	**Cabrillo Onsite Project Manager** Pedro Lopez, Fueling Administrator Encina Power Station Voice: (760) 268-4070 Cell: (760) 644-0682

4.0 ONSITE RESPONSE EQUIPMENT

The onsite spill response team would have access to an appropriate quantity of onsite spill response and cleanup materials during decommissioning activities. In the event of a spill, the anchor-handling tugboat or other support vessel would be utilized as a boom tender vessel, if necessary. The Project Manager would immediately cease Project operations in order to deploy appropriate spill response equipment. Table G-2 lists the minimum onsite spill response equipment that would be maintained and readily available for emergency response of minor spills.

Table G-2. Onsite Spill Response Equipment Inventory

Quantity	Equipment Type
4	400-foot Absorbent Boom
10 Bales	3M Type 156 Sorbent Pads
100	Plastic Storage Bags
1	Roll of Visqueen sheeting
1,000 feet	Containment Boom

5.0 NOTIFICATION

An important step in the response procedure is notifying the necessary parties of an incident. Notification is essential to activate response organizations, alert company management, obtain assistance and cooperation of agencies, mobilize resources, and comply with local, State, and federal regulations. Parties would be notified in an order based on their ability to provide assistance in controlling or minimizing the impacts of an incident. Refer to Table G-3 for a list of agency notifications to be made in the event of an 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)

Table G-3. 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	National Response Center	(800) 424-8802	All spills to land or water	Immediately	1. Location of release or threatened release 2. Quantity released 3. Type of oil 4. Your name and phone number
	California Emergency Management Agency	(800) 852-7550			
	National Response Center	(800) 424-8802			
	USCG San Diego Unit	(619) 278-7033			
	State Lands Commission	(562) 499-6312			
	California Department of Fish and Wildlife / OSPR	(916) 445-9338			
	California Coastal Commission	(415) 904-5285			
	Regional Water Quality Control Board	858) 467-2952			
	Oiled Wildlife Care Network	(530) 752-4167			
Medical Emergencies	Fire Department/ Ambulance	911	Medical assistance and/or transport required	ASAP	1. Type of injury 2. Location 3. Condition 4. Action taken 5. Number of victims
	CalOSHA	(415) 737-2932		As required	

Acronyms: USCG = U.S. Coast Guard; OSPR = Office of Oil Spill Prevention and Response; CalOSHA = California Occupational Safety and Health Administration; ASAP = As Soon As Possible.

The Lampert-Keene Seastrand Oil Spill Prevention and Response Act (OSPR) (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. It should be noted that the California Oil Spill Contingency Plan defines an oil spill as any amount of oil emitted by any means into California's waters (OSPR 2001). The California Code of Regulations, which implements SB 2040, requires that the specific information shown in Table G-4 be given to notified agencies. In addition, all actions, including agency notification, should be recorded on the Event Log. A regulatory agency address directory is provided in Table G-5.

Essential agency notifications are further assured by the California Emergency Services Management Agency and the NRC since they would notify related State and federal agencies.

If a spill impacts navigable waters, notification of the NRC is mandatory and normally results in simultaneous notification of the USCG. However, it is recommended that a call be made to the local USCG office in San Diego at (619) 278-7033 after contacting the NRC.

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

Table G-4. Information Checklist/Event Log

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: - Wave height - Size and appearance of slick - Direction of slick movement - Speed of movement, if known • Prevailing weather conditions: - Wind speed - Wind direction - Air temperature • Measures taken or planned by personnel on scene - 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.

Table G-5. Addresses of Regulatory Agencies

NATIONAL RESPONSE CENTER U.S. Coast Guard Headquarters 2100 Second Street SW Washington, D.C. 20593 **U.S. COAST GUARD, San Diego Unit** 2710 North Harbor Drive San Diego, CA 92101 **U.S. DEPARTMENT OF TRANSPORTATION** 111 Grand Avenue, P.O. Box 23660 Oakland, CA 94623 **NATIONAL MARINE FISHERIES SERVICE** 510 W. Ocean Blvd., Suite 4200 Long Beach, CA 90802 **CALIFORNIA COASTAL COMMISSION** 45 Fremont Street, Suite 2000 San Francisco, CA 94105	**CALIFORNIA DEPARTMENT OF FISH AND GAME** **Office of Spill Prevention and Response (OSPR)** 1700 K Street Sacramento, CA 95814 **CALIFORNIA EMERGENCY SERVICES AGENCY** 3650 Schriever Avenue Mather, CA 95655 **CALIFORNIA DIVISION OF SAFETY AND HEALTH** 1655 Mesa Verde Avenue, Room 150 Ventura, CA 93003 **CALIFORNIA STATE LANDS COMMISSION** 200 Oceangate, Suite 900 Long Beach, CA 90802

6.0 MARINE SPILL SCENARIOS AND RESPONSE PROCEDURES

6.1 MINOR SPILLS

This scenario consists of minor spillage of oil or oily water (less than 5 barrels) from a marine support vessel or pipeline. In this case, response will consist of deployment of sorbent boom and sorbent pads that are stored on the support barge. In addition, containment boom will be deployed if necessary. Table G-6 lists the response procedures for a minor marine spill.

Table G-6. Minor Marine Oil Spill Response Procedures

Responsible Person	Action
Marine Superintendent – Cabrillo or Contractor	• 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. • 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.

Responsible Person	Action
Project Manager – Cabrillo or Contractor	• Mobilize the onsite oil spill response team. • Determine if oil spill response contractor or oil spill response organization should be notified. • Notify appropriate agencies including: – National Response Center: (800) 424-8802 – California Emergency Management Agency: (800) 852-7550 – California State Lands Commission: (562) 499-6312 – California Coastal Commission: (415) 904-5285 – California Department of Fish and Game/OSPR: (916) 445-9338 – U.S. Coast Guard San Diego Unit: (619) 278-7033 – Oiled Wildlife Care Network: (877) 823-6926 • Supervise response and clean up operations. • File written reports to appropriate agencies.

6.2 MAJOR SPILLS

For the purposes of this OSRP, a major spill is defined as any spill greater than 5 barrels. The only realistic spill potential would be minor and originate from the marine support vessels, deck equipment, and the MOT pipeline. Since the pipeline was pigged and flushed of any residual hydrocarbons, proposed Project activities are not expected to result in a major oil spill.

7.0 ONSHORE SPILL SCENARIOS AND RESPONSE PROCEDURES

7.1 MINOR SPILLS

This scenario consists of minor spillage of fuel, oil or hydraulic fluid from terrestrial equipment used to support onshore decommissioning activities. Any fuel, oil, or hydraulic spills that occur would be contained with the appropriate containers (i.e., drip pans or other impervious material) and sorbent pads. Sorbent pads would be maintained at each onshore location where work with petroleum-fueled equipment would be performed. Any contaminated material generated would be disposed at a permitted/approved site.

7.2 MAJOR SPILLS

For the purposes of this OSRP, a major spill is defined as any spill greater than 5 barrels. Because the fuel oil submarine pipeline was previously flushed and pigged, and none of the other decommissioning activities involve large volumes of hydrocarbons (greater than 5 barrels), it is unlikely that a major spill would occur during onshore Project activities.