APPENDIX L
OIL SPILL RESPONSE PLAN

L.1 INTRODUCTION

This Oil Spill Response Plan (OSRP) has been prepared in support of the Dynegy Morro Bay Power Plant Marine Terminal Decommissioning Project (Project). The purpose of this OSRP is to present an overview of the measures incorporated into the Project design to minimize the potential for a hydrocarbon release and to outline the procedures and protocols that will be utilized in the event of an onshore or offshore oil spill resulting from Project activities.

Dynegy proposes to decommission the Morro Bay Power Plant Marine Terminal (Terminal). The Terminal consists of approximately 5,740 feet (ft) (1,749 meters [m]) of parallel 16-inch (in) and 24-in diameter pipelines that were used to transfer fuel oil from marine vessels moored at the offshore termination to onshore tanks within the power plant. The Terminal has not been used in recent years since the pipeline were purged with fresh water, treated to pH 10-11 with caustic soda, and placed in "caretaker" status on January 9, 1992. Decommissioning activities will include removal of the offshore, surf zone, and beach segments of the 24-inch and 16-inch submarine pipelines. Refer to Section 2.0 – Project Description for a more detailed description of the proposed decommissioning activities. It is important to note that although oil has already been removed from the marine terminal pipelines, the pipelines will be pigged and flushed during routine maintenance activities performed prior to the commencement of decommissioning activities. This maintenance activity will ensure that residual hydrocarbons and caustic soda that may still be in the pipelines are removed to the degree feasible prior to decommissioning.

L.2 POTENTIAL SPILL SOURCES

Potential spill sources of hydrocarbons include releases from onshore and offshore equipment used during the decommissioning of the MBPP marine terminal facilities, accidental discharges from onshore fuel storage and refueling operations (if needed), and leakage from the pipelines during cleaning and/or removal operations. There are no other pipelines adjacent to the Project site that are considered a potential spill source.

L.2.1 Pipeline Leaks

Although the pipeline is currently filled with water containing low-level residual hydrocarbons and a corrosion inhibitor (caustic soda), the pigging and flushing operations that will be performed prior to the commencement of decommissioning activities are expected to reduce the hydrocarbon concentration to less than 15 parts per million (ppm) total petroleum hydrocarbons (TPH) and remove the corrosion inhibitor. Analytical results confirming the above will be submitted to the applicable agencies prior to the commencement of decommissioning activities. As both pipelines will have been pigged and flushed prior to decommissioning, significant sources of hydrocarbons will have already been removed thereby minimizing a potential release of hydrocarbons from the pipelines.

L.2.2 Onshore Equipment

Equipment associated with the onshore decommissioning activities includes excavators, backhoes, bulldozers, loaders, generators, air compressors, hydraulic power sources, dynamic pipe rammer, and welding machines. This equipment is primarily diesel-powered. The use of motorized terrestrial equipment in the onshore and beach operations present opportunities for accidental hydrocarbon releases. These include leakage of fuel, motor oil, or hydraulic fluid when the equipment is operated, when it is idled, during refueling, or during equipment maintenance. To prevent equipment leakage all equipment used at the site will be required to be in good working condition and will be

inspected each day for leakage. Onshore, equipment that is found to be leaking petroleum product will be immediately moved to an equipment staging and refueling area and the leaking fluids contained until the equipment is repaired. All onshore equipment refueling and maintenance will take place at a designated equipment staging area which will provide additional protection against offsite migration of oil. In the event of a spill onshore the contractor will take the appropriate action to clean up the spill. Specifically, onsite 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, will be available should onsite equipment be insufficient to recover and remove the spilled petroleum product.

L.2.3 Offshore Equipment

Several offshore support vessels may be employed at the Project site while pipelines are removed. A derrick barge with onboard decommissioning equipment such as a diesel-driven crane, air compressors, etc. may be the primary offshore decommissioning support vessel. Additional materials or deck barges may be involved and one or more tugboats may be onsite to set anchors and tend the barges. The derrick barge and all motor driven vessels shall have diesel fuel and/or gasoline, and lubricants onboard. However, 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 fuel tank, if a storage container is spilled, if deck equipment leaks and the leaks enters the water, or if a vessel sinks.

The derrick barge will have deck equipment aboard to support the offshore decommissioning activities. The deck equipment may include air compressors, generators, welders, dynamic pipe rammer, and winches. The potential for a release from this diesel-powered equipment is minimal due to the small volume of fuel and lubrication fluids contained within each piece of equipment. Equipment that is used on a day-to-day basis will be monitored for leaks; if a leak is observed, the faulty equipment will cease operation and appropriate clean-up and corrective measures will be implemented. All deck-mounted equipment will have drip pans under them and sorbent pads will be available on the barge for clean-up of minor hydrocarbon leaks from the deck equipment. All equipment refueling will be limited to refueling from deck mounted Coast Guard approved fuel totes or from integral fuel tanks built into the derrick barge. No cross-vessel fueling will be permitted. All hydrocarbon-based fluids stored onboard the vessels will be in appropriate containers and will include secondary containment structures.

L.3 OIL SPILL RESPONSE TEAM

Dynegy and its contractors will maintain an onsite spill response team to handle minor spills (five barrels or less) and to provide initial response to major spills (more than five 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 will be supervised by the Onsite Project Manager (or other appointed supervisor) and will consist of all qualified contractor personnel working onsite at the time of the spill. The On-Scene Coordinator will request additional response personnel and equipment, if necessary.

Dynegy has an existing contract with Philip Transportation and Remediation, Inc. for spill response and cleanup services. Although not anticipated, if a major offshore release occurs that is beyond the response capabilities of the designated onsite response team, Philip Transportation and Remediation will provide additional assistance in the mechanical containment and recovery terrestrial oil spills. However, Pacific Petroleum California, Inc. (PPC) is only prepared to respond to terrestrial releases. As such, Dynegy will establish a contractual agreement with an oil spill response organization capable of providing 24-hour on-call emergency spill response services in the marine environment prior to the commencement of decommissioning activities. Oil spill response organizations that can respond to

releases in the marine environment are also typically capable of responding to terrestrial releases as well. Table L.3.1 lists the oil spill response organizations that if necessary, will be used to provide secondary response services throughout the duration of the Project.

Table L.3-1. Emergency Oil Spill Response Contractors (Secondary Responders)

Role	Contact Information
Terrestrial Emergency Response	**Pacific Petroleum California, Inc.** 1571 E. Betteravia Road. Santa Maria, CA (805) 925-1947
Marine Emergency Response	**Clean Seas** 990 Cindy Lane, Unit B Carpinteria, CA 93013 (805) 684-3838

L.4 ONSITE RESPONSE EQUIPMENT

The onsite spill response team will have access to an appropriate quantity of onsite spill response and cleanup material during decommissioning activities. The anchor-handling 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 appropriate spill response equipment. Table L.4-1 lists the minimum onsite spill response equipment that will be maintained and readily available for emergency response of minor spills.

Table L.4-1. 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 ft	Containment Boom

L.5 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 be notified before those that are remote from the incident. Refer to Table L.5-1 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; and
- Periodic progress updates and reports (if necessary).

Table L.5-1. 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	(916) 845-8510	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 Morro Bay Station	(805) 772-2167			
	State Lands Commission (Mineral Resources Management)	(562) 590-5201			
	California Department of Fish and Wildlife/ OSPR	(916) 445-9338			
	California Coastal Commission (Central Coast Office)	(831) 427-4863			
	Oiled Wildlife Care Network	(530) 752-4167			
	Marine Mammal Center - Morro Bay Rescue Line	(805) 771-8300			
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. No. of victims
	CalOSHA	(800) 794-6900		As required	

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

L.5.1 Emergency Agency Notification

The Lampert-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. 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, 2010). The California Code of Regulations implementing SB 2040 requires that the specific information shown in Table L.5-2 be given to the agencies when making notifications.

Table L.5-2. 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: • 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.

All actions, including agency notification, should be recorded on the Event Log. A regulatory agency address directory is provided in Table L.5-3.

Table L.5-3. Addresses of Regulatory Agencies

NATIONAL RESPONSE CENTER U.S. Coast Guard Headquarters 2100 Second Street SW Ste. 7102 Washington, D.C. 20593 **U.S. COAST GUARD, Morro Bay Station** 1279 Embarcadero Morro Bay, CA 93442 **U.S. DEPARTMENT OF TRANSPORTATION** 111 Grand Avenue Oakland, CA 94612 **NATIONAL MARINE FISHERIES SERVICE** 501 W. Ocean Blvd. Long Beach, CA 90802 **CALIFORNIA COASTAL COMMISSION** 725 Front Street, Suite #300 Santa Cruz, CA 95060	**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE** **Office of Spill Prevention and Response (OSPR)** 1700 K Street Ste. 250 Sacramento, CA 95811 **CALIFORNIA EMERGENCY MANAGEMENT AGENCY** 3650 Schriever Avenue Mather, CA 95655 **CALIFORNIA DIVISION OF SAFETY AND HEALTH** 7718 Meany Avenue Bakersfield, CA 93008 **CALIFORNIA STATE LANDS COMMISSION** 200 Oceangate, 12th Floor Long Beach, CA 90802

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 Morro Bay at (805) 772-2167.

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.

L.5.2 Company Notification

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

QUALIFIED INDIVIDUAL

Ninah Rhodes Hartley Environmental Compliance Specialist	
WORK:	(805) 771-9143
CELLULAR:	(805) 540-1541

L.6 MARINE SPILL SCENARIOS AND RESPONSE PROCEDURES

L.6.1 Minor Spills

This scenario consists of minor spillage of oil or oily water (less than five 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 L.6-1 lists the response procedures for a minor marine spill.

Table L.6-1. Minor Marine Oil Spill Response Procedures

Responsible Person	Action
Marine Superintendent - 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.
Project Manager - Chevron 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 (916) 845-8510 – State Lands Commission (562) 590-5201 – California Coastal Commission (831) 427-4863 – California Department of Fish and Wildlife/OSPR (916) 445-9338 – U.S. Coast Guard Morro Bay Station (805) 772-2167 – Oil Wildlife Care Network (530) 752-4167 – Marine Mammal Center – Morro Bay (805) 771-8300 • Supervise response and cleanup operations. • File written reports to appropriate agencies.

L.6.2 Major Spills

For the purposes of this OSRP, a major spill is defined as any spill greater than five barrels. The only realistic spill potential is minor spills from the marine support vessels, deck equipment, and the marine terminal pipelines. Since the loading pipelines will be pigged and flushed of any residual hydrocarbons prior to Project commencement, Project activities are not expected to result in a major oil spill. Further, all marine operations will be conducted per the procedures outlined in the Marine Safety and Anchoring Plan (Appendix F), which emphasizes “good mariner practices” and further reduces the potential for a large spill to occur as a result of Project implementation.

L.7 ONSHORE SPILL SCENARIOS AND RESPONSE PROCEDURES

L.7.1 Minor 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 will be contained with appropriate containers (i.e. drip pans or other impervious material) and sorbent

pads. Sorbent pads will be maintained at each onshore location where work with petroleum-fueled equipment is being performed. Minor spill cleanup is the responsibility of Dynegy or their contractors.

L.7.2 Major Spills

Onshore decommissioning activities will primarily consist of abandonment-in-place of both pipelines within the sand dune environment, and removal of both pipelines from beach environment.

Because the pipelines will be pigged and flushed prior to Project commencement, the marine terminal pipelines are not considered a significant potential source for a major onshore oil spill. None of the other onshore decommissioning activities are expected to involve any large volumes (greater than five barrels) of hydrocarbons. Thus, it is unlikely that sources that could result in a major spill will be encountered during onshore Project activities. However, should oil-containing materials be encountered, they will be handled in accordance with the procedures outlined in Contaminated Materials Management Plan (Appendix K).

L.8 REFERENCES

Office of Spill Prevention and Response (OSPR) Department of Fish and Game. 2010. California State Oil Spill Contingency Plan. January 2010.