

Vancouver Energy
Operations Facility Oil Spill Contingency Plan
EFSEC Application for Site Certification No. 2013-01
Docket No. EF131590



Appendix A
Training and Exercises

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**APPENDIX A
TRAINING AND EXERCISES**

A.1 EXERCISE REQUIREMENTS AND SCHEDULES

The Vancouver Energy (Facility) and Tesoro participate in the National Preparedness for Response Exercise Program (PREP) in order to satisfy the exercise requirements of the EPA and USCG. Additionally, the Facility and Tesoro are committed to Ecology’s drill program, as outlined in WAC 173-180-700 & 710. The facility meets all applicable drill components established in the Spill Drill Evaluation Checklist in Ecology’s Publication #98–251/June 1998. During each triennial cycle, all components of the Plan must be exercised at least once. The 15 core components listed in **FIGURE A.1** are the types of components that must be exercised.

Response exercise will be designed to:

1. Provide an opportunity for SMT personnel to practice responding to a spill.
2. Test FRP for shortcomings or errors.
3. Improve Company personnel’s spill response expertise in specified ICS positions.
4. Comply with PREP guidelines.

Facility/Tesoro supplies the IRT and SMT with initial 8-hour spill response training and annual refresher training, including review of ICS/US, ICS Forms, with emphasis placed on the greatest exposure for a given group.

Training is accomplished through video, written and oral presentation as well as hands on. Annual refresher training is intended to be approximately 8 hours.

Training in the NIMS ICS used by Facility/Tesoro is given to all team members during an initial training session designed to cover ICS positions and ICS Forms.

Review of the NWACP and Area GRP location and use are included in annual ICS refresher training.

Individuals with no previous experience with the SMT will receive 8 hours of ICS training prior to being assigned to a position. Newly assigned individuals will normally have a coach working with them.

SMT positions are assigned and will only be filled by the experienced individuals. It’s recognized that IC and Section Persons assigned into these roles will receive 8 hours initial ICS training and 8-hours refresher training, and will be expected to complete an additional 16 hours of position-specific training prior to being permanently assigned. Additional training may include off-site workshops, actual drill or spill exposure, job-related experience, or other relevant training specific to the position.

The Supervisor of Contingency Planning is responsible for scheduling, maintaining records, implementing and evaluating this drill program, and ensuring that post-drill evaluation improvements are implemented. Descriptions of these exercises are listed in **FIGURE A.2**.

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Figure A.1 – Prep Response Plan Core Components

| Core Components | Description |
|---|--|
| 1. Notifications | Test the notifications procedures identified in the Area Contingency Plan and the associated Responsible Party Response Plan. |
| 2. Staff Mobilization | Demonstrate the ability to assemble the spill response organization identified in the Area Contingency Plan and the associated Responsible Party Response Plan. |
| 3. Ability to Operate Within the Response Management System Described in the Plan: Unified Command Response Management System | Demonstrate the ability of the spill response organization to work within a unified command. Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans. |
| 4. Discharge Control | Demonstrate the ability of the spill response organization to control and stop the discharge at the source. |
| 5. Assessment | Demonstrate the ability of the response organization to provide initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations. |
| 6. Containment | Demonstrate the ability of the spill response organization to contain the discharge at the source or in various locations for recovery operations. |
| 7. Recovery | Demonstrate the ability of the spill response organization to recover the discharged product. |
| 8. Protection | Demonstrate the ability of the spill response team organization to protect the environmentally and economically sensitive areas identified in the Area Contingency Plan and the respective industry response plan. |
| 9. Disposal | Demonstrate the ability of the spill response organization to dispose of the recovered material and contaminated debris. |
| 10. Communications | Demonstrate the ability to establish an effective communications system for the spill response organization. |
| 11. Transportation | Demonstrate the ability to establish multi-mode transportation both for execution of the discharge and support functions. |
| 12. Personnel Support | Demonstrate the ability to provide the necessary support of all personnel associated with response. |
| 13. Equipment Maintenance and Support | Demonstrate the ability to maintain and support all equipment associated with the response. |
| 14. Procurement | Demonstrate the ability to establish an effective procurement system. |
| 15. Documentation | Demonstrate the ability of the spill response organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken. |

Figure A.2 – Exercise Requirements

| Exercise Type | Exercise Characteristics |
|--------------------------------------|---|
| Facility/QI Notification | <ul style="list-style-type: none"> • Conducted quarterly • Facility initiates mock spill notification to QI • Terminal Manager documents time/date of notification, name and phone number of individual contacted • Document in accordance with form in FIGURE A.3 |
| Equipment Deployment | <ul style="list-style-type: none"> • Conducted semiannually • Response contractors listed in FRP must participate in annual deployment exercise • Document in accordance with form in FIGURE A.3 |
| SMT Tabletop | <ul style="list-style-type: none"> • Conducted annually • Tests SMT's response activities/responsibilities • Documents plan's effectiveness • Must exercise worst case discharge scenario once every three years • Must test all plan components at least once every three years • Document in accordance with form in FIGURE A.3 |
| Unannounced | <ul style="list-style-type: none"> • Company will either participate in unannounced tabletop exercise or Facility equipment deployment exercise on an annual basis, if selected • Company may take credit for participation in government initiated unannounced drill in lieu of drill required by PREP guidelines • Plan holders who have participated in a PREP government-initiated unannounced exercise will not be required to participate in another one for a least 36 months from the date of the exercise. • If equipment is deployed during this exercise, it may be counted as one of the "semi-annual" deployment drills. |
| Area | <ul style="list-style-type: none"> • Company will participate in a minimum of one area exercise per six-year period |
| Other Exercise Considerations | |
| Drill Program Evaluation Procedures | <ul style="list-style-type: none"> • Company conducts post-exercise meetings to discuss positive items, areas for improvement and to develop action item checklist to be implemented later |
| Records of Drills | <ul style="list-style-type: none"> • Company will maintain exercise records for five years following completion of each exercise • Records will be made available to WDOE, EPA, USCG and other applicable agencies upon request • Company will verify appropriate records are kept for each spill response contractor listed in Plan as required by PREP guidelines (annual equipment deployment drill, triennial unannounced drill, etc.) |

Figure A.3 – Preparedness for Readiness Exercise Form

| PREPAREDNESS FOR READINESS EXERCISE PROGRAM VANCOUVER ENERGY/TESORO EXERCISE DOCUMENTATION FORM | |  TESORO | |
|--|----------------------|--|--|
| Vessel/Facility Name: _____ | Exercise Year: _____ | | |
| First Quarter: Qualified Individual Notification Exercise | | | |
| <input type="checkbox"/> Announced <input type="checkbox"/> Unannounced | | | |
| A. Name of Qualified Individual: _____ | | Title: _____ | |
| B. Is Qualified Individual identified in Contingency Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| C. Notification method: <input type="checkbox"/> Telephone <input type="checkbox"/> Pager <input type="checkbox"/> In Person <input type="checkbox"/> Radio <input type="checkbox"/> Other | | | |
| D. Did notification procedure follow C-Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| E. Comments: _____ | | | |
| F. Self-Certification: Name: _____ Title: _____ | | | |
| Second Quarter: Qualified Individual Notification Exercise | | | |
| <input type="checkbox"/> Announced <input type="checkbox"/> Unannounced | | | |
| A. Name of Qualified Individual: _____ | | Title: _____ | |
| B. Is Qualified Individual identified in Contingency Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| C. Notification method: <input type="checkbox"/> Telephone <input type="checkbox"/> Pager <input type="checkbox"/> In Person <input type="checkbox"/> Radio <input type="checkbox"/> Other | | | |
| D. Did notification procedure follow C-Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| E. Comments: _____ | | | |
| F. Self-Certification: Name: _____ Title: _____ | | | |
| Third Quarter: Qualified Individual Notification Exercise | | | |
| <input type="checkbox"/> Announced <input type="checkbox"/> Unannounced | | | |
| A. Name of Qualified Individual: _____ | | Title: _____ | |
| B. Is Qualified Individual identified in Contingency Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| C. Notification method: <input type="checkbox"/> Telephone <input type="checkbox"/> Pager <input type="checkbox"/> In Person <input type="checkbox"/> Radio <input type="checkbox"/> Other | | | |
| D. Did notification procedure follow C-Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| E. Comments: _____ | | | |
| F. Self-Certification: Name: _____ Title: _____ | | | |
| Fourth Quarter: Qualified Individual Notification Exercise | | | |
| <input type="checkbox"/> Announced <input type="checkbox"/> Unannounced | | | |
| A. Name of Qualified Individual: _____ | | Title: _____ | |
| B. Is Qualified Individual identified in Contingency Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| C. Notification method: <input type="checkbox"/> Telephone <input type="checkbox"/> Pager <input type="checkbox"/> In Person <input type="checkbox"/> Radio <input type="checkbox"/> Other | | | |
| D. Did notification procedure follow C-Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| E. Comments: _____ | | | |
| F. Self-Certification: Name: _____ Title: _____ | | | |

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Figure A.3 – Preparedness for Readiness Exercise Form (Continued)

Date: _____ Announced Unannounced

First: Emergency Procedures Exercise

A. Emergency Procedures Tested: _____

B. Drill Location on site: _____

C. List Personnel Participating: _____

D. Describe objectives and how they were exercised: _____

E. Descriptions of lessons learned: _____

F. Self-Certification: Name: _____ Title: _____

* Note: Emergency Procedure Exercises are optional for facilities

Second: Emergency Procedures Exercise

Date: _____ Announced Unannounced

A. Emergency Procedures Tested: _____

B. Drill Location on site: _____

C. List Personnel Participating: _____

D. Describe objectives and how they were exercised: _____

E. Descriptions of lessons learned: _____

F. Self-Certification: Name: _____ Title: _____

* Note: Emergency Procedure Exercises are optional for facilities

Figure A.3 – Preparedness for Readiness Exercise Form (Continued)

First: Equipment Deployment Exercise

Date: _____ Announced Unannounced

A. Equipment Ownership: Facility OSRO Both

B. Provide attachment listing Equipment and Personnel

C. Was equipment deployed in its intended operating environment? Yes No

D. Describe objectives and how they were exercised: _____

E. Descriptions of lessons learned: _____

F. Is Spill Response Equipment in a Preventative Maintenance Program? Yes No

G. Self-Certification: Name: _____ Title: _____

Second: Equipment Deployment Exercise

Date: _____ Announced Unannounced

A. Equipment Ownership: Facility OSRO Both

B. Provide attachment listing Equipment and Personnel

C. Was equipment deployed in its intended operating environment? Yes No

D. Describe objectives and how they were exercised: _____

E. Descriptions of lessons learned: _____

F. Is Spill Response Equipment in a Preventative Maintenance Program? Yes No

G. Self-Certification: Name: _____ Title: _____

Figure A.3 – Preparedness for Readiness Exercise Form (Continued)

Spill Management Team Tabletop Exercise

RESPONSE CATEGORY

- Announced
- Unannounced
- Average Most Probable Discharge
- Maximum Most Probable Discharge
- Worst Case Discharge
- Simulated Real _____ bbls

PREP CORE REQUIREMENTS COMPLETED THIS CALENDAR YEAR

- Notifications
- Assessment
- Protection of Sensitive Areas
- Staff Mobilization
- Containment
- Personnel Support
- Response Management System
- Recovery
- Equipment Maintenance
- Unified Command
- Disposal
- Procurement
- SMT Operations
- Communications
- Documentation
- Discharge Control
- Transportation

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A.2. TRAINING PROGRAM

The Facility Manager and Facility Supervisor are trained to the following level:

1. 40 hour HAZWOPER;
2. 8 hour ICS;
3. 16 hour Specialized ICS;
4. 8 hour oil spill response;
5. 40 hour Coastal Oil Spill Control Course at Texas A&M.

The Supervisor, Contingency Planning is designated as the Training Supervisor. The Training Supervisor prepares and conducts a spill prevention training session in conjunction with safety meetings. **FIGURE A.4** lists training requirements for spill responders. **FIGURE A.8** is a form for documenting a safety meeting.

At a minimum, all Facility Operators will receive training adequate to satisfy HAZWOPER level 3 (24-hour) requirements.

The Facility will comply with the requirements of WAC 173-180(C), Ecology's Facility Personnel Oil-Handling Training and Certification Program and WAC 296-62-3112. Tesoro's Training manual and documentation were approved by the Department of Ecology on June 15, 1995 and recertified in June 2000.

The objectives of the training program are to prevent oil spills caused by human error, promote job competency and environmental awareness, and certify the competency of all terminal personnel. The training program is on file at the Facility. The training program elements include:

1. a training topic core program,
2. a trainer qualification section,
3. a competency-based training program,
4. a training and certification program, and
5. a training manual and materials section. Recertification of the training program is required every 3 years.

Daily, weekly, monthly and annual inspection and maintenance routines and examples of record keeping and inspection forms for the Facility are presented in **Appendix G**.

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Figure A.4 – Training Elements

| Training Type | Training Characteristics |
|---|---|
| Training in Use of Oil Spill Plan | <ul style="list-style-type: none"> • All terminal personnel will be trained to properly report/monitor spills • Plan will be reviewed annually with all employees and contract personnel • The Personnel Response Training Log is provided in FIGURE A.6. |
| OSHA Training Requirements | <ul style="list-style-type: none"> • All Company responders designated in Plan must have 24 hours of initial spill response training <ul style="list-style-type: none"> – Laborers having potential for minimal exposure must have 24 hours of initial oil spill response instruction and 8 hours of actual field experience – Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training offsite and 24 hours of actual field experience – On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hours of specialized hazardous waste management training – Managers/employees require 8 hours of annual refresher training |
| Spill Management Team Personnel Training | <ul style="list-style-type: none"> • See recommended PREP Training Matrix (FIGURE A.5) |
| Training for Casual Laborers or Volunteers | <ul style="list-style-type: none"> • Company will not use casual laborers/volunteers for operations requiring HAZWOPER training |
| Wildlife | <ul style="list-style-type: none"> • Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife |
| Training Documentation and Record Maintenance | <ul style="list-style-type: none"> • Training activity records will be retained five years for all personnel following completion of training • Company will retain training records indefinitely for individuals assigned specific duties in Plan • Training records will be retained at the Terminal. Training Supervisor will document all applicable training. FIGURE A.9 is a training activity report to be used to document training completed at the Facility. |

Figure A.5 – Training Program Matrix
 (Based upon the Training Reference for Oil Spill Response-USCG, RSPA, EPA, MMS, 1994)

| TRAINING ELEMENT | QUALIFIED INDIVIDUAL (QI) | SPILL MANAGEMENT TEAM (SMT) | FACILITY RESPONDER S |
|---|---------------------------|-----------------------------|----------------------|
| Captain of the Port (COTP) Zones or Environmental Protection Agency (EPA) regions in which the facility is located. | X | X | X |
| Notification procedures and requirements for facility owners or operators; internal response organizations; federal and state agencies; and contracted oil spill removal organizations (OSRO's) and the information required for those organizations. | X | X | X |
| Communication system used for the notifications. | X | X | X |
| Information on the products, stored, used, or transferred, by the facility, including familiarity with the material safety data sheets, special handling procedures, health and safety hazards, spill and firefighting procedures. | X | X | X |
| Procedures the facility personnel may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from facility operational activities associated with internal or external cargo transfers, storage, or use. | X | | |
| Facility personnel responsibilities and procedures for use of facility equipment which may be available to mitigate or prevent an oil discharge. | X | X | X |
| Operational capabilities of the contracted OSRO's to respond to the following: <input type="checkbox"/> Average most probable discharge (small discharge); <input type="checkbox"/> Maximum most probable discharge (medium discharge); and <input type="checkbox"/> Worst-case discharge. | X | X | X |
| Responsibilities and authority of the Qualified Individual as described in the facility response plan and company response organization. | X | X | X |

Figure A.5 – Training Program Matrix (Continued)
 (Based on the Training Reference for Oil Spill Response - USCG, RSPA, EPA, MMS, 1994)

| TRAINING ELEMENT | QUALIFIED INDIVIDUAL (QI) | SPILL MANAGEMENT TEAM (SMT) | FACILITY RESPONDERS |
|--|---------------------------|-----------------------------|---------------------|
| The organizational structure that will be used to manage the response actions including: <input type="checkbox"/> Command and control; <input type="checkbox"/> Public information; <input type="checkbox"/> Safety; <input type="checkbox"/> Liaison with government agencies; <input type="checkbox"/> Spill response operations; <input type="checkbox"/> Planning; <input type="checkbox"/> Logistics support; and <input type="checkbox"/> Finance. | X | X | X |
| The responsibilities and duties of each oil spill management team within the organizational structure. | X | X | |
| The drill and exercise program to meet federal and state regulations as required under OPA. | X | X | X |
| The role of the Qualified Individual in the post discharge review of the plan to evaluate and validate its effectiveness. | X | | |
| The Area Contingency Plan (ACP) for the area in which the facility is located. | X | X | X |
| The National Contingency Plan (NCP). | X | X | X |
| Roles and responsibilities of federal and state agencies in pollution response. | X | X | X |
| Available response resources identified in response plan. | X | X | |
| Contracting and ordering procedures to acquire oil spill removal organization resources identified in the response plan. | X | X | |
| OSHA requirements for worker health and safety (29 CFR 1910.120). | x | x | x |
| Incident Command System/Unified Command System. | x | x | |

Applicable to designated job responsibilities.

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Figure A.5 – Training Program Matrix (Continued)

(Based upon the Training Reference for Oil Spill Response - USCG, RSPA, EPA, MMS, 1994)

| TRAINING ELEMENT | QUALIFIED INDIVIDUAL (QI) | SPILL MANAGEMENT TEAM (SMT) | FACILITY RESPONDERS |
|---|---------------------------|-----------------------------|---------------------|
| Public Affairs. | X | X | |
| Crisis management. | X | X | |
| Procedures for obtaining approval for dispersant use or in-situ burning of the spill. | X | | |
| Oil spill trajectory analyses. | X | | |
| Sensitive biological areas. | X | X | |
| This training procedure as described in the response plan for members of the spill management team | | X | |
| Procedures for the post discharge review of the plan to evaluate and validate its effectiveness. FIGURE A.7 is a form to document a discharge prevention meeting. | | X | |
| Basic information on spill operations and oil spill clean-up technology including: <input type="checkbox"/> Oil containment; <input type="checkbox"/> Oil recovery methods and devices; <input type="checkbox"/> Equipment limitations and uses; <input type="checkbox"/> Shoreline clean-up and protection; <input type="checkbox"/> Spill trajectory analysis; <input type="checkbox"/> Use of dispersants, in-situ burning, bioremediation; and <input type="checkbox"/> Waste storage and disposal considerations. | | X | |
| Hazard recognition and evaluation. | | X | |
| Site safety and security procedures, | | X | |
| Personnel management, as applicable to designated job responsibilities. | | X | |
| Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities. | | | |

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(Based upon the Training Reference for Oil Spill Response - USCG, RSPA, EPA, MMS, 1994)

| TRAINING ELEMENT | QUALIFIED INDIVIDUAL (QI) | SPILL MANAGEMENT TEAM (SMT) | FACILITY RESPONDERS |
|---|---------------------------|-----------------------------|---------------------|
| Specific procedures to shut down affected operations. | | | X |
| Procedures to follow in the event of discharge, potential discharge, or emergency involving the following equipment or scenarios: <ul style="list-style-type: none"> <input type="checkbox"/> Tank overfill; <input type="checkbox"/> Tank rupture; <input type="checkbox"/> Piping or pipeline rupture; <input type="checkbox"/> Piping or pipeline leak, both under pressure or not under pressure, if applicable; <input type="checkbox"/> Explosion or fire; <input type="checkbox"/> Equipment failure; and <input type="checkbox"/> Failure of secondary containment system. | | | X |
| Name of the Qualified Individual and how to contact him or her. | | | X |

Figure A.7 – Discharge Prevention Meeting Log

| | |
|---|----------------------|
| Date: _____ | |
| Subject / Issue Identified: _____ _____ _____ | |
| Required Action Item Identified: | |
| 1. _____ | |
| 2. _____ | |
| 3. _____ | |
| 4. _____ | |
| Date of Implementation of Action Items: | |
| 1. _____ | WO # Issued _____ |
| 2. _____ | _____ |
| 3. _____ | _____ |
| 4. _____ | _____ |
| Meeting Attendee Name/Dept: | |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

**Figure A.9 – Vancouver Energy Spill Prevention and Response
Training Activity Report**

DATE OF TRAINING: _____

LOCATION: _____

INSTRUCTOR/COMPANY: _____

COURSE/TOPICS/HOURS: _____

SOURCE/TYPE OF TRAINING MATERIALS _____

NAME OF PARTICIPANTS

| <u>LAST NAME</u> | <u>FIRST NAME</u> | <u>SIGNATURE</u> |
|------------------|-------------------|------------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

This form shall be completed for all spill prevention and response related training except for monthly safety/prevention meetings, which are documented on a separate form.

OPA 90 "PREP" training shall be recorded on this form and on the documentation form provided by the Coast Guard.

To comply with State requirements, annual training will include a practice exercise on spill prevention during abnormal operations.

This form shall be maintained at the Terminal for a period of five years.

Tesoro Savage Vancouver Energy Distribution Terminal
5501 NW Lower River Road
Vancouver, Washington 98660

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