

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



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Appendix E  
Cross Reference/OPA 90 Requirements

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**APPENDIX E  
CROSS REFERENCE/OPA 90 REQUIREMENTS**

**Figure E.1. Cross Reference to Ecology Plan Requirements  
(per WAC Cross Reference — 173-182 WAC)**

**This table to be updated after all information has been added to the document and a full cross reference can be completed.**

Item	Section/Figure
<b>SECTION A – General Planning, Information, and Timing</b>	
<b>Plan Maintenance and Reporting Obligations (WAC 173-182-140, 142, 145, 150)</b>	
Plan maintenance and update procedures: 173-182-140. Annual review – review the entire plan for accuracy and either: (1) Update and distribute amended pages to ecology, or (2) Send letter confirming existing plan is accurate 173-182-142. Notify Ecology of significant changes 173-182-145. Plan implementation procedures 173-182-150. Post spill review and documentation: Conduct post spill review procedures to confirm effectiveness of plan and make plan improvements	Section 1.3  Section 1.3 Section 1.1 & 1.3 Section 8.0
<b>SECTION B – Contingency Plan Format and Content</b>	
<b>Contingency Plan Format Requirements (WAC 173-182-210)</b>	
(1). Formatted for maximum usefulness during a spill (includes job aids, diagrams, checklists)	Addressed
(2). Formatted with tabbed chapters, sections and annexes/appendices. Includes detailed TOC based on chapter, section, annex and titles, tables and figures.	Addressed
(3). Format allows replacement of revised pages.	Addressed
<b>Binding Agreement Statement (WAC 173-182-220)</b>	
Signed by plan holder, and owner or operator or designee with authority to bind the owners and operators of the facilities or vessels covered by the plan. Name, address, phone number, email and website of submitting party. Verification of commitment to immediate response to spills. Commit to having an Incident Commander in the state within 6 hours after notification of a spill. Commit to implementation and use of plan during a spill and substantial threat of a spill, and to training of personnel to implement plan. Verify authority and capability of plan holder to make necessary and appropriate expenditures to implement plan provisions. Commit to working in unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.	Preface
<b>Contingency Plan Content (WAC 173-182-230)</b>	
(2). Plan refers to and is consistent with the NWACP.	Addressed
(3)(a). States federal and state requirements intended to be met by plan.	Section 1.2
(3)(b). Plan states size of worst-case spill. (i). For transmission pipelines – more than one worst case spill volume for different line sections may be submitted. (ii). For vessel umbrella plans that enroll both tank vessels and nontank covered vessels and that rely on supplemental resources for approval, the worst case discharge volume and product type for both tank and nontank covered vessels for each port covered by the contingency plan for each port of operation may be submitted to ecology (if operations of enrolled vessels differ by port). (iii). For multiple facilities using a single plan, separate worst case spill volumes are required for each facility.	Section 1.1
(3)(c). Revision Log to record revisions and updates (identify section amended, date of amendment, verification that ecology notified, authorized person making change). A description of the amendment and its purpose shall also be included in the log sheet, or filed as an amendment letter to be inserted in the plan immediately after the log sheet.	Page vi
(3)(d). Cross reference table reflecting locations in the plan of each component required.	Figure E.1

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Item	Section/Figure
(3)(e). Name, phone number, address, 24 hour contact number of PRC.	Appendix B
(i). Contract or letter summarizing terms of contract signed by the PRC.	Figure B.2
(ii). If contract not submitted make available for inspection upon request.	N/A
(iii). Copy of mutual aid agreements and description of terms of that document.	Appendix B
(iv). Specify in writing if plan holder relies on a PRC or other contractor to staff ICS positions for spill management team.	N/A
(v). If the entire contract for additional spill management team support is not included in the plan, that document shall be made available for inspection if requested.	N/A
(3)(f). Procedures to track and account for the entire volume of oil recovered and oily wastes generated and disposed of during spills. The responsible party must provide these records to Ecology upon request.	Sections 5.7 & 5.9
(4). Facility plan content:	
(a). Facility name, location, address	Figure 1.4
(b). Starting date of operations.	Figure 1.4
(c). Description of operations covered by plan.	
(i). List oil handling operations that occur at the facility	Figure 1.4
(ii). Inventory all tanks and list the tank capacity	Figure 1.3
(iii). All oil(s) or product(s) handled by name and include: density, gravity, API, oil group number, and sulfur content (sweet/sour).	Figures 1.5, 1.6, & 1.7
(iv). Written description and map indicating site topography, stormwater and other drainage systems, mooring areas, pipelines, tanks, and other oil processing, storage, and transfer sites and operations. (CB, need figure with topo)	Section 1.5
(v). Describe geographic area that could be impacted from a spill at the location based on a 48-hour worst-case spill trajectory analysis.	
(5) For vessel plans	N/A
(6). Plans covering multiple vessels with different owners shall also include:	N/A
(7). Umbrella plans shall list the name of the entities that provide supplemental equipment.	Appendix B
(8). Plan provides concise procedures to establish a process to manage oil spill liability claims of damages to persons or property, public or private, for which a responsible party may be liable.	Section 5.2
<b>Requirements for vessel umbrella plans maintaining additional agreements for supplemental resources (WAC 173-182-232)</b>	N/A
<b>Field Document (WAC 173-182-240)</b>	
(1). Field document listing time critical information for the initial emergency phase of the spill and a substantial threat of a spill. The owner or operator of the covered vessel or facility shall make the field document available to personnel who participate in oil handling operations and shall keep the field document in key locations at facilities, docks, on vessels and in the plan. The locations where field documents are kept must be listed in the plan, provided that plan holders covering multiple persons shall not be subject to enforcement if the owner or operator of an enrolled vessel fails to keep the field documents in the location specified in the plan. Plans covering multiple persons shall include procedures to ensure each vessel covered by the plan is provided the field document prior to entering Washington waters. This can include by electronic means.	Sections 1 to 3
(2). At a minimum, the field document shall contain:	
(a). A list of the procedures to detect, assess and document the presence and size of a spill.	Section 2
(b). Spill notification procedures and a call out list that meets the requirements in WAC <a href="#">173-182-260</a> and <a href="#">173-182-262</a> or <a href="#">173-182-264</a> as applicable; and	Section 3
(c). A checklist that identifies significant steps used to respond to a spill, listed in a logical progression of response activities.	Figure 2.3
<b>Additional requirements for vessel plan holders with access to the emergency response system at Neah Bay (WAC 173-182-242)</b>	N/A
<b>Initial Response Actions (WAC 173-182-250)</b>	
(1). Initial Spill Action Forms shall be included in the plan and used to document their initial spill actions.	Figure 5.1
(2). Describe equipment to be used to conduct initial spill assessment - including equipment effective in darkness and low visibility (e.g., visual methods, tracking buoys, trajectory modeling, aerial overflights, thermal and infrared)	Section 2.4
(3). Safety Assessment (including initial air monitoring) for all types of spills, including spills to groundwater	Section 5

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Item	Section/Figure
(4). Procedures to confirm the occurrence and estimate the quantity and nature of the spill, including updated reports if the initially reported quantity or the area extent of the contamination changes significantly.	Section 2.5
<b>Notification and call-out procedures (WAC 173-182-260)</b>	
(1). Procedures to immediately notify appropriate parties <ul style="list-style-type: none"> <li>Identify central reporting office or individuals responsible for implementing the notification procedure</li> </ul>	Section 3
(2). List name and phone numbers of required notifications to government agencies, response contractors, spill management team members (internal call down information need not be included but should be available for review)	
(3). Identify clear order of priority for immediate notification.	
<b>Vessel notification requirements for a discharge or substantial threat of a discharge (WAC 173-182-262)</b>	N/A
<b>Notification requirements for facility spills to ground or containment that threaten waters of the state (WAC 173-182-264)</b>	
(1). Facility plans shall contain procedures for notifications for spills to ground and to permeable secondary containment that threaten to impact waters of the state.	Figure 3.4
(2). Plan holders must also include procedures in their plan to address spills of an unknown volume.	Section 6.8
<b>Maintenance records for response equipment (WAC 173-182-270)</b>	
(1). Response equipment maintained in a state of readiness and in accordance with manufacturer specifications	Section 7 & Appendix G
(2). Schedules, methods, and procedures for equipment maintenance. (maintenance records for at least 5 years available upon request)	
<b>Spill Management Teams (WAC 173-182-280)</b>	
(1). Personnel available to manage oil spill (including contract personnel)	Figure 4.2
(a). An organizational diagram depicting the chain of command for the spill management team for a worst case spill.	Figure 4.3
(b). For the purpose of ensuring depth of the spill management team, an organization list of one primary and one alternate person to lead each ICS spill management position down to the section chief and command staff level as depicted in the NWACP standard ICS organizational chart (made available to ecology upon request). If a response contractor is used to fill positions, they must agree in writing to staff the positions. The capacity and depth of spill management teams will be evaluated in drills and spills.	Figure 4.2
(c). A job description for each spill management position (if consistent with NWACP may reference)	Figure 4.4
(d). A detailed description of the planning process which will be used to manage a spill (if consistent with NWACP may reference)	Section 4
(2). Type and frequency of training for each position. Training program to include at a minimum ICS, NWACP policies, use and location of GRPs, contents of plan, worker health and safety. Training program also to include participation in announced and unannounced exercises, and participation should approximate the actual roles and responsibilities of the individual specified in the plan. New employees shall complete the training program prior to being assigned job responsibilities which require participation in emergency response situations.	Section 4.7
(3). The plan shall identify a primary and alternate incident commander's representative that can form unified command at the initial command post, and if located out-of-state, a primary and alternate incident commander that could arrive at the initial command post within six hours. The plan shall include estimated time frames for arrival of the remainder of the spill management team to the spill site, or at the incident command post as appropriate.	Figure 4.2
(4). The plan shall list a process for orderly transitions of initial response staff to incoming local, regional or away team personnel, including transitions between shift changes.	Section 4.3
(5). Covered vessel umbrella plans	N/A
<b>SECTION C – Planning Standards</b>	
<b>Planning Standards (WAC 173-182-310)</b>	
(1). Ecology shall apply planning standard when determining ability of plan holder to meet regulations (to be verified at drills/spills). In an actual spill event, initial deployment shall be guided by safety considerations. RP must address entire volume of actual spill regardless of planning standards.	
(2). Planning standards do not constitute cleanup standards.	

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Item	Section/Figure
<b>Vancouver Planning Standard (WAC 173-182-420)</b> See WAC 173-182-420 for boom assessment, minimum oil recovery rate, and storage planning standards for covered vessel and facility plan holders that transit or operate on the Columbia River between statute mile 99 and 107.	Section 7.1.8
<b>Washington Coast Planning Standard (WAC 173-182-450)</b> Capable of sustaining a worst case spill response and shall develop an addendum specific to Washington's coast, including: (1). Capability, if applicable, for in situ burning, dispersant use, and mechanical recovery (2). Surveillance equipment (including fixed wing helicopters and low visibility equipment) to provide for aerial assessment of spill within 6 hours of spill awareness (3). Time frames and mechanisms to cascade in equipment and other resources for up to 72 hours (4). 10,000 feet of boom appropriate for shoreline protection, containment and/or ten thousand feet of open water boom for enhanced skimming, containment or other use to arrive within twelve hours (5). 20,000 feet of boom appropriate for containment, protection or recovery to arrive within twenty four hours	Section 2.4.1 & 7.1.8
<b>SECTION D – Response and Protection Strategies for Sensitive Areas</b>	
<b>Requirements for response and protections strategies (WAC 173-182-510)</b>	
(1). Methods to track and contain spilled oil and enhance recovery and removal operations described in the plan	Section 2.4
(2). Describe how environmental protection will be achieved: (a). Protection of sensitive shoreline and island habitat by diverting or blocking oil movement (b). Description of sensitive areas and strategies to protect resources (including info on natural resources, coastal and aquatic habitat types and sensitivity by season, breeding sites, presence of state or federally endangered or threatened species, commercial and recreational species, geographic features, isolation areas beach types, geological characteristics (c). Identify public resources (public beaches, water intakes, drinking water supplies, marinas) (d). Identify shellfish resources and methods to protect (e). Identify significant economic resources to be protected in area covered by plan (f). For facilities with potential to impact "sole source" aquifer/public drinking water supply identify type of substrate and geologic extent of sensitive sites	Section 6 & Appendix F
(3). Refer to NWACP for GRP's developed to meet requirements. If approved GRPs do not exist in the NWACP, work with ecology to determine alternative sensitive areas to protect.	Section 6.7
(4). Identify potential initial command post locations	Section 4.4
<b>Planning standards for shoreline cleanup (WAC 173-182-520)</b> identify and ensure availability of response resources necessary to perform shoreline cleanup operations.	Appendix F
<b>Covered vessel planning standards for shoreline cleanup (WAC 173-182-522)</b>	N/A
<b>Planning standards for ground water spills (WAC 173-182-530)</b>	
(1). Describe methods used to immediately assess ground water spills.	Section 6.8.4
(2). Contact information for resources typically used to investigate, contain, and remediate/recover spills to ground water.	Section 7.9
<b>Planning standards for wildlife rescue and rehabilitation (WAC 173-182-540)</b> identify applicable federal, state, and NWACP requirements for wildlife rescue and rehabilitation, and describe equipment, personnel, resource and strategies for compliance with the requirements. Resources are capable of arriving on scene within 24 hours of spill awareness.	Section 6.6

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**Figure E.2. EPA OPA 90 Cross Reference**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
1.0	Response Plan Cover Sheet (EPA Sec. 2.0)	Figure 1.4
	a. General Information (Sec. 2.1)	Figure 1.4
	b. Applicability of Substantial Harm Criteria (Sec. 2.2)	Figure 1.4
	c. Certification (Sec. 2.3)	Figure 1.4
2.0	Emergency Response Action Plan (ERAP) (Sec. 1.1)	
	a. Qualified Individual (QI) Information (Sec. 1.2)	Figure 3.1, Section 4.6
	b. Emergency Notification List (Sec. 1.3.1)	Figure 3.1, Figure 3.3, Figure 3.4
	c. Spill Response Notification Form (Sec. 1.3.1)	Figure 3.2
	d. Response Equipment List and Location (Sec. 1.3.2)	Section 7
	e. Response Equipment Testing and Deployment (Sec. 1.3.4)	Section 7
	f. Facility Response Team List (Sec. 1.3.4)	Section 4
	g. Evacuation Plan (Sec. 1.3.5)	Figures 2.1 - 2.2
	h. Immediate Actions (Sec. 1.7.1)	Figure 2.7
	i. Facility Diagrams (Sec. 1.9)	Figures 1.6 - 1.7
*The sections above should be extracted from the more detailed corresponding sections of the plan.		
3.0	Facility Information (Sec. 1.2)	Figure 1.4
	a. Facility name (Sec. 1.2.1)	Figure 1.4
	b. Street address	Figure 1.4
	c. City, State, Zip	Figure 1.4
	d. County	Figure 1.4
	e. Phone number	Figure 1.4
	f. Latitude/Longitude (Sec. 1.2.2)	Figure 1.4
	g. Wellhead protection area (Sec. 1.2.3)	Figure 1.4
	h. Owner/operator (both names included, if different) (Sec. 1.2.4)	Figure 1.4
	i. QI Information (Sec. 1.2.5) (Name, position, street address, phone numbers)	Figure 1.4

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
j.	Description of specific response training experience	Figure 1.4, Section 4.6, Appendix A.2
k.	Oil storage start-up date (Sec. 1.2.6)	Figure 1.3
l.	Facility operations description (Sec. 1.2.7)	Figure 1.3
m.	Standard Industrial Classification code	Figure 1.3
n.	Dates and types of substantial expansion (Sec. 1.2.8)	Figure 1.3
4.0	Emergency Response Information (Sec. 1.3)	
	Notification (Sec. 1.3.1)	Figure 3.3, Section 3
a.	Emergency Notification Phone list	Figure 3.3, Section 3
1.	National Response Center phone number	Figure 3.3, Section 3
2.	QI (day and evening) phone numbers	Figure 3.3, Section 3
3.	Company response team (day and evening) phone numbers	Figure 3.3, Section 3
4.	Federal On-Scene Coordinator (OSC) and/or Regional response center (day and evening) phone numbers	Figure 3.3, Section 3
5.	Local response team phone numbers (Fire Department/Cooperatives)	Figure 3.3, Section 3
6.	Fire marshal (day and evening) phone numbers	Figure 3.3, Section 3
7.	SERC (day and evening) phone numbers	Figure 3.3, Section 3
8.	State police phone number	Figure 3.3, Section 3
9.	LEPC phone number	Figure 3.3, Section 3
10.	Wastewater treatment facility (s) name and phone number (recommended)	Figure 3.3, Section 3
11.	Local water supply system (day and evening) phone numbers	Figure 3.3, Section 3
12.	Weather report phone number	Figure 3.3, Section 3
13.	Local TV/radio phone number(s) for evacuation notification	Figure 3.3, Section 3
14.	Hospital phone number	Figure 3.3, Section 3
b.	Spill Response Notification Form	Figures 3.2 - 3.3

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
5.0	Response Equipment List (Sec. 1.3.2)	
	a. Skimmer Pumps	Section 7, Appendix B
	1. Operational Status	Section 7, Appendix B
	2. Type, Model, and Year	Section 7, Appendix B
	3. Number	Section 7, Appendix B
	4. Capacity	Section 7, Appendix B
	5. Daily Effective Recovery Rate	Section 7, Appendix B
	6. Storage Location(s)	Section 7, Appendix B
	7. Date Fuel Last Changed	Section 7, Appendix B
	b. Boom	Section 7, Appendix B
	1. Operational Status	Section 7, Appendix B
	2. Type, Model, and Year	Section 7, Appendix B
	3. Number	Section 7, Appendix B
	4. Size (length)	Section 7, Appendix B
	5. Containment Area	Section 7, Appendix B
	6. Storage Location	Section 7, Appendix B
	c. Chemicals Stored	Section 7, Appendix B
	1. Date Authorized	Section 7, Appendix B
	d. Dispersant Dispensing Equipment	Section 7, Appendix B
	1. Operational Status	Section 7, Appendix B
	2. Type and Year	Section 7, Appendix B
	3. Capacity	Section 7, Appendix B
	4. Storage Location	Section 7, Appendix B
	5. Response Time	Section 7, Appendix B
	e. Sorbents	Section 7, Appendix B
	1. Operational Status	Section 7, Appendix B

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
2.	Type and Year Purchased	Section 7, Appendix B
3.	Amount	Section 7, Appendix B
4.	Absorption Capacity	Section 7, Appendix B
5.	Storage Location(s)	Section 7, Appendix B
f.	Hand Tools	Section 7, Appendix B
1.	Operational Status	Section 7, Appendix B
2.	Type and Year	Section 7, Appendix B
3.	Quantity	Section 7, Appendix B
4.	Storage Location	Section 7, Appendix B
g.	Communication Equipment	Section 7, Appendix B
1.	Operational Status	Section 7, Appendix B
2.	Type and Year	Section 7, Appendix B
3.	Quantity	Section 7, Appendix B
4.	Storage Location/Number	Section 7, Appendix B
h.	Fire Fighting and Personnel Protective Equipment	Section 7, Appendix B
1.	Operational Status	Section 7, Appendix B
2.	Type and Year	Section 7, Appendix B
3.	Quantity	Section 7, Appendix B
4.	Storage Location	Section 7, Appendix B
i.	Other (e.g. Heavy Equipment, Boats, and Motors)	Section 7, Appendix B
1.	Operational Status	Section 7, Appendix B
2.	Type and Year	Section 7, Appendix B
3.	Quantity	Section 7, Appendix B
4.	Storage Location	Section 7, Appendix B
6.0	Response Equipment Testing and Deployment Drill Log (Sec. 1.3.3)	
a.	Date of Last Inspection or Equipment Test	Section 7, Appendix B

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
b.	Inspection Frequency	Section 7, Appendix B
c.	Date of Last Deployment Drill	Section 7, Appendix B
d.	Deployment Frequency	Section 7, Appendix B
e.	OSRO Certification	Section 7, Appendix B
7.0	Personnel (Sec. 1.3.4)	
a.	Emergency Response Personnel Information	Section 4
1.	Name	Figures 3.3 & 4.2
2.	Phone numbers	Figures 3.3 & 4.2, Section 4
3.	Response time	Section 4
4.	Responsibility	Figure 4.4
5.	Type and date of response training	Appendix A
b.	Emergency Response Contractor Information	
1.	Name	Appendix B
2.	Phone numbers	Appendix B
3.	Response time	Appendix B
4.	Evidence of contractual agreement	Appendix B
c.	Facility Response Team Information	Section 4
1.	Job title/position of emergency response personnel	Figure 4.2, Section 4
1.1	Response Time	Figure 4.2, Section 4
1.2	Phone/pager	Figure 4.2, Section 4
2.	Name of emergency response contractor (Contractors providing facility response team services may be different than contractors providing oil spill response services)	N/A
2.1.	Response time	N/A
2.2	Phone/pager	N/A
8.0	Evacuation Plan (Sec. 1.3.5)	Figures 2.1 – 2.2
a.	Facility Evacuation Plan (Sec. 1.3.5.1)	Figure 2.2

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
1.	Location of stored materials	Figure 2.1
2.	Hazard imposed by spilled materials	Figure 2.1
3.	Spill flow direction	Figure 2.1
4.	Prevailing wind directions and speed	Figure 2.1
5.	Water currents, tides, or wave conditions (if applicable)	Figure 2.1
6.	Arrival route of emergency response personnel and response equipment	Figure 2.1
7.	Evacuation routes	Figures 2.1 – 2.2
8.	Alternative routes of evacuation	Figures 2.1 – 2.2
9.	Transportation of injured personnel to nearest emergency medical facility	Figure 2.1
10.	Location of alarm/notification systems	Figure 2.1
11.	Centralized check-in area for roll call	Figure 2.1
12.	Mitigation command center location	Figure 2.1
13.	Location of shelter at facility	Figures 2.1 – 2.2
b.	Community Evacuation Plans referenced (Sec. 1.3.5.3)	Figure 2.1
9.0	Description of Qualified Individual 's Duties (Sec. 1.3.5)	Section 4.6
a.	Activate internal alarms and hazard communication systems	Section 4.6
b.	Notify response personnel	Section 4.6
c.	Identify character, exact source, amount, and extent of the release	Section 4.6
d.	Notify and provide information to appropriate Federal, State and Local authorities	Section 4.6
e.	Assess interaction of spilled substance with water and/or other substances stored at facility and notify on-scene response personnel of assessment	Section 4.6
f.	Assess possible hazards to human health and the environment	Section 4.6
g.	Assess and implement prompt removal actions	Section 4.6
h.	Coordinate rescue and response actions	Section 4.6
i.	Access company funding to initiate cleanup activities	Section 4.6

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
j.	Direct cleanup activities	Section 4.6
10.0	Hazard Evaluation (Sec. 1.4)	Appendix D
a.	Hazard Identification (Sec. 1.4.1)	Appendix D
1.	Tank and Surface Impoundment Forms	Figure C.3
1.1	Tanks	Figure C.3
a.	Tanks Number(s)	Figure C.3
b.	Substance(s) Stored	Figure C.3
c.	Quantity(s) Stored	Figure C.3
d.	Tank Type(s)/Year(s)	Figure C.3
e.	Maximum Capacity(s)	Figure C.3
f.	Failure(s)/Cause(s)	Figure C.3
1.2	Surface Impoundments (SI)	N/A
a.	SI Number(s)	N/A
b.	Substance(s) Stored	N/A
c.	Quantity(s) Stored	N/A
d.	Surface Area(s)/Year(s)	N/A
e.	Maximum Capacity(s)	N/A
f.	Failure(s)/Cause(s)	N/A
2.	Labeled schematic drawing	Figures 1.6 & and C.4
3.	Description of transfers (loading and unloading) and volume of material	Section C.3, Section D.3
4.	Description of daily operations	Figure 1.3, Section C.2, Section D.3
5.	Secondary containment volume	Section C.2
6.	Normal daily throughput of the facility	Figure 1.4
11.0	Vulnerability Analysis (Sec. 1.4.2) (see Appendix A - Calculation of the Planning Distance)	Section 6.4
a.	Analysis of potential effects of an oil spill on vulnerable areas	Section 6.4

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
1.	Water Intake	Section 6.4
2.	Schools	Section 6.4
3.	Medical facilities	Section 6.4
4.	Residential areas	Section 6.4
5.	Businesses	Section 6.4
6.	Wetlands or other sensitive environments	Section 6.4
7.	Fish and wildlife	Section 6.4
8.	Lake and streams	Section 6.4
9.	Endangered flora and fauna	Section 6.4
10.	Recreational areas	Section 6.4
11.	Transportation routes (air, land, and water)	Section 6.4
12.	Utilities	Section 6.4
13.	Other applicable areas	Section 6.4
12.0	Analysis of the Potential for an Oil Spill (Sec. 1.4.3)	Appendix D.2
1.	Description of likelihood of release occurring	Appendix D.2
a.	Oil spill history for the life of the facility	Appendix D.2
b.	Horizontal range of potential spill	Appendix D.5
c.	Vulnerability to natural disaster	Appendix D.2
d.	Tank age	Appendix D.2
e.	Other factors (e.g., unstable soils, earthquake zones, Karst topography, etc.)	Appendix D.2
13.0	Facility Reportable Oil Spill History Description (Sec. 1.4.4)	Figure D.2
a.	Date of discharge(s)	Figure D.2
b.	List of discharge causes	Figure D.2
c.	Material(s) discharged	Figure D.2
d.	Amount of discharges in gallons	Figure D.2
e.	Amount that reached navigable waters (if applicable)	Figure D.2

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
f.	Effectiveness and capacity of secondary containment	Figure D.2
g.	Clean-up actions taken	Figure D.2
h.	Steps taken to reduce possibility of reoccurrence	Figure D.2
i.	Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	Figure D.2
j.	Enforcement actions	Figure D.2
k.	Effectiveness of monitoring equipment	Figure D.2
l.	Spill detection	Figure D.2
14.0	Discharge Scenario (Sec. 1.5)	Appendix D.6
	Small Discharges (Sec. 1.5.1)	Appendix D.6
a.	Description of small discharge scenario addressing facility operations and components (Sec. 1.5.1.1)	Appendix D.6
1.	Loading and unloading operations	Appendix D.6
2.	Facility maintenance operations	Appendix D.6
3.	Facility piping	Appendix D.6
4.	Pumping stations and sumps	Appendix D.6
5.	Oil storage tanks	Appendix D.6
6.	Vehicle refueling operations	Appendix D.6
7.	Age and condition of facility and components	Appendix D.6
b.	Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.6
1.	Size of spill	Appendix D.6
2.	Proximity to down gradient water	Appendix D.6
3.	Proximity to fish and wildlife and sensitive environments	Appendix D.6
4.	Likelihood that discharge will travel offsite	Appendix D.6
5.	Location of material spilled (i.e., on concrete pad or soil)	Appendix D.6
6.	Material discharged	Appendix D.6
7.	Weather or aquatic conditions	Appendix D.6

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
8.	Available remediation equipment	Appendix D.6
9.	Probability of a chain reaction or failures	Appendix D.6
10.	Direction of spill pathway	Appendix D.6
	Medium Discharge (Sec. 1.5.1)	Appendix D.6
c.	Description of medium discharge scenario addressing facility operations and components (Sec. 1.5.1.1)	Appendix D.6
1.	Loading and unloading operations	Appendix D.6
2.	Facility maintenance operations	Appendix D.6
3.	Facility piping	Appendix D.6
4.	Pumping stations and sumps	Appendix D.6
5.	Oil storage tanks	Appendix D.6
6.	Vehicle refueling operations	Appendix D.6
7.	Age and condition of facility and components	Appendix D.6
d.	Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.6
1.	Size of spill	Appendix D.6
2.	Proximity to down gradient water	Appendix D.6
3.	Proximity to fish and wildlife and sensitive environments	Appendix D.6
4.	Likelihood that discharge will travel offsite	Appendix D.6
5.	Likelihood of material spilled (i.e., on concrete pad or soil)	Appendix D.6
6.	Material discharge	Appendix D.6
7.	Weather or aquatic conditions	Appendix D.6
8.	Available remediation equipment	Appendix D.6
9.	Probability of a chain reaction or failures	Appendix D.6
10.	Direction of spill pathway	Appendix D.6
15.0	Worst Case Discharge (Sec. 1.5.2) (See Appendix A)	Appendix D.6
a.	Correct Worst Case Discharge calculation for specific type of facility	Appendix D.6

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
b.	Description of worst case discharge scenario	Appendix D.6
1.	Loading and unloading operations	Appendix D.6
2.	Facility maintenance operations	Appendix D.6
3.	Facility piping	Appendix D.6
4.	Pumping stations and sumps	Appendix D.6
5.	Oil storage tanks	Appendix D.6
6.	Vehicle refueling operations	Appendix D.6
7.	Age and condition of facility and components	Appendix D.6
c.	Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.6
1.	Size of spill	Appendix D.6
2.	Proximity to down gradient water	Appendix D.6
3.	Proximity to fish and wildlife and sensitive environments	Appendix D.6
4.	Likelihood that discharge will travel offsite	Appendix D.6
5.	Location of material spilled (i.e., on concrete pad or soil)	Appendix D.6
6.	Material discharged	Appendix D.6
7.	Weather or aquatic conditions	Appendix D.6
8.	Available remediation equipment	Appendix D.6
9.	Probability of a chain reaction or failures	Appendix D.6
10.	Direction of spill pathway	Appendix D.6
16.0	Discharge Detection Systems (Sec. 1.6)	Operations Spill Prevention, Control and Countermeasures Plan
	Discharge Detection by Personnel (Sec. 1.6.1)	Appendix C.2, Appendix G
a.	Description of procedures and personnel for spill detection	Appendix C.2, Appendix G
b.	Description of facility inspections	Appendix G
c.	Description of initial response actions	Appendix G
d.	Emergency Response Information (referenced)	Appendix G
17.0	Automated Discharge Detection (Sec. 1.5.2)	Operations Spill Prevention, Control and Countermeasures Plan

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
a.	Description of automatic spill detection equipment, including overfill alarms and secondary containment sensors	Operations Spill Prevention, Control and Countermeasures Plan
b.	Description of alarm verification procedures and subsequent actions	Appendix G
18.0	Plan Implementation (Sec 1.7)	
a.	Identification of response resources for small, medium, and worst case spills (Sec. 1.7.1)	Appendix D.6
b.	Description of response actions	Appendix D.6
1.	Emergency plans for spill response	Throughout Plan
2.	Additional response training	Section 7
3.	Additional contracted help	Section 7
4.	Access to additional response equipment/experts	Section 7
5.	Ability to implement plan. Including response training and practice drills.	Section 4.7 & 7
19.0	Disposal Plan (Sec. 1.7.2)	Section 5.7, Section 7.5
a.	Description of procedures for recovering, reusing, decontaminating or disposing of materials	Section 5.7, Section 7.5
b.	Materials addressed in Disposal Plan (Recovered product, contaminated soil, contaminated equipment and materials, personnel protective equipment, decontamination solutions, absorbents, spent chemicals)	Section 5.7, Section 7.5
c.	Plan prepared in accordance with any Federal, State, and/or Local regulations	Section 5.7, Section 7.5
d.	Plan addresses permits required to transport or disposal of recovered materials	Section 5.7, Section 7.5
20.0	Containment and Drainage Planning (Sec. 1.7.3)	Appendix C
a.	Description of containing/controlling a spill through drainage.	Appendix C
1.	Containment volume	Appendix C.2
2.	Drainage route from oil storage and transfer areas	Figure 1.7
3.	Construction materials in drainage troughs	Appendix C.2
4.	Type and number of valves and separators in drainage system	Appendix C.2

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
5.	Sump pump capacities	Appendix C.2
6.	Containment capacities of weirs and booms and their location	Figure 6.11 & 7.1, Appendix C.2
7.	Other clean up materials	Section 7, Appendix C.2
21.0	Self-Inspection, Training, and Meeting Logs (Sec. 1.8)	
	Facility Self-Inspection (Sec. 1.8.1)	Appendix G
a.	Records of tank inspections contained or cross referenced in plan or maintained electronically	Appendix G
b.	Records of secondary containment inspections contained or cross referenced in plan or maintained electronically	Appendix G
c.	Equipment Inspection Checklist	Appendix G
d.	Response Equipment Checklist (Sec. 1.8.1.2)	Appendix G
1.	Inventory (item and quantity)	Appendix G
2.	Storage location	Appendix G
3.	Accessibility (time to access and respond)	Appendix G
4.	Operational status/condition	Appendix G
5.	Actual use/testing (last test date and frequency of testing)	Appendix G
6.	Shelf life (present age, expected replacement date)	Appendix G
e.	Response Equipment Inspection Log	Appendix G
1.	Inspection records maintained for 5 years	Appendix G
22.0	Facility Drills/Exercise (Sec. 1.8.2)	Appendix A
a.	Description of drill/exercise program based on PREP guidelines or other comparable program	Appendix A
1.	QI notification drill	Appendix A
2.	Spill management team tabletop exercise	Appendix A
3.	Equipment deployment exercise	Appendix A
4.	Unannounced exercise	Appendix A
5.	Area exercise	Appendix A

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

<b>EPA OPA 90 REQUIREMENTS (40 CFR 112)</b>		<b>LOCATION IN THIS PLAN</b>
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
b.	Description of evaluation procedures for drill program	Appendix A
c.	Qualified Individual Notification Drill Log (Sec. 1.8.2.1) (Date, company, qualified individual, emergency scenario, evaluation)	Appendix A
d.	Spill Management Team Tabletop Drill Log (Sec. 1.8.2.2) (Date, company, qualified individual, emergency scenario, evaluation, changes to be implemented, time table for implementation)	Appendix A
23.0	Response Training (Sec. 1.8.3)	Appendix A
a.	Description of Response Training program (including topics)	Appendix A
b.	Personnel Response Training Logs (Name, response training date/and number of hours; prevention training date/and number of hours)	Appendix A
24.0	Diagrams (Sec. 1.9)	
	Site Plan Diagram	Figure 1.6
a.	Entire facility to scale	Figure 1.6
b.	Above and below-ground storage tanks	Figure 1.6
c.	Contents and capacities of bulk oil storage tanks and drum oil storage areas	Figure 1.6
d.	Process buildings	Figure 1.6
e.	Transfer areas	Figure 1.6
f.	Location and capacity of secondary containment systems	Figure 1.6
g.	Location of hazardous materials	Figure 1.6
h.	Location of communications and emergency response equipment	Figure 1.6
i.	Location of electrical equipment that might contain oil	Figure 1.6
25.0	Site Drainage Plan Diagram	
a.	Major sanitary and storm sewers, manholes, and drains	Figure 1.7
b.	Weirs and shut-off valves	Figure 1.7
c.	Surface water receiving streams	Figure 1.7
d.	Firefighting water sources	Figure 1.7

**Figure E.2. EPA OPA 90 Cross Reference (continued)**

EPA OPA 90 REQUIREMENTS (40 CFR 112)		LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		
e.	Other utilities	Figure 1.7
g.	Response equipment transportation routes	Figure 2.2
h.	Direction of spill flow from discharge points	N/A
26.0	Site Evacuation Plan Diagram	Figure 2.2
a.	Evacuation routes	Figure 2.2
b.	Location of regrouping areas	Figure 2.2
27.0	Site Security (Sec. 1.10)	Section 7.2
a.	Description of facility security (Emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, pipeline connection caps)	Section 7.2
28.0	Acronyms and References	Appendix I

**Figure E.3. USCG OPA 90 Cross Reference**

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN PLAN
<b>a) Introduction and Plan Content</b>	
1. Facility Name and Location address, city, county, state, zip, phone number, fax number.	Fig. 1.4
2. Facility Directions (including but not limited to maps, landmarks and river mile that could aid a responder and reviewer).	Section 1.4; Figure 1.6
3. Name, address and procedures for contacting the facility's owner or operator on a 24 hour basis.	Figure 1.4
4. Table of contents.	Preface
5. Period when submitted plan does not have to conform to the subpart, a cross index, if appropriate.	Appendix E
6. Record of change(s) to record information on plan updates.	Page vi
<b>b) Emergency Response Action Plan</b>	
1. Notification procedures	Section 3
• Prioritized list of facility response personnel.	
• Federal, State, or local agencies, as required.	Section 3, Figure 3.1 & 3.3
• Notification of the National Response Center.	Figure 3.1, 3.3 & 3.4
• Spill response notification forms to Federal, State, local agencies. Form must state that initial notification must not be delayed by collection of data.	Figure 3.2
2. Facility's spill mitigation procedures	Appendix D
(i) Describe volume and oil groups that would be involved in the following:	
• Average, maximum and worse discharge from the MTR facility.	
• Where applicable, the worst case discharge from the non-transportation-related facility.	Appendix D.6
(ii) Prioritized list of procedures and facility personnel (identified by job title). Procedures must address actions to be taken in the event of a discharge, potential discharge, or emergency involving the following equipment and scenarios:	Sections 2 & 4; Appendix D
• Transfer equipment	
• Tank overfill or failure	
• Piping rupture, leak both under pressure and not under pressure	
• Explosion or fire	
• Equipment failure	
(iii) Listing of equipment and the responsibilities of facility personnel to mitigate an average most probable discharge	Section 7.0
3. Facility's response activities	
(i) Responsibilities of facility personnel to initiate a response and supervise response resources pending arrival of qualified individuals.	Figures 4.3 & 4.4
• Responsibilities and authority of the qualified individual and	
• Alternate as required in § 154.1026.	Section 4.6

**Figure E.3. USCG OPA 90 Cross Reference (continued)**

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN PLAN
	<b>Vancouver</b>
(iii) Apply the following organizational structure to manage response actions: <ul style="list-style-type: none"> <li>• Command and control</li> <li>• Public information</li> <li>• Safety</li> <li>• Liaison with government agencies</li> <li>• Spill operations</li> <li>• Planning</li> <li>• Logistics support</li> <li>• Finance</li> </ul>	Figures 4.1 & 4.3
(iv) Identify oil spill removal organizations and the spill management teams to be capable of providing the following response resources: <ul style="list-style-type: none"> <li>• Equipment &amp; supplies to meet § 154.1045, 154.1047, as appropriate</li> <li>• Trained personnel for response to be on hand for the first 7 days of the response</li> <li>• Job descriptions for each spill management team member within the organizational structure in a response action.</li> </ul>	Section 7.1
	Figure 4.4
(v) For mobile facilities in more than one COTP zone, oil spill removal organizations and the spill management teams must be identified from paragraph (3)(iv) and included in each COTP zone.	N/A
<b>4. Sensitive areas</b>	
(i) Identify areas of economic importance and environmental sensitivities as identified in the ACP, which are potentially impacted by a worst case discharge.	Section 6.2 – 6.4
(ii) For a worst case discharge the plan must address the following: <ul style="list-style-type: none"> <li>• List all sensitive elements identified in ACP that are potentially impacted by a discharge</li> <li>• Describe all response actions anticipated to protect sensitive elements</li> <li>• Contain map or chart that depicts each response action anticipated.</li> </ul>	Section 6.3 – 6.4
	Section 6.5 - 6.8, Figures 6.7, 6.10 & 6.11
(iii) Identify appropriate equipment and personnel as described in §154.1028 to protect sensitive elements by one of the following calculations: <ul style="list-style-type: none"> <li>• Persistent oils and non-petroleum oils discharged into non-tidal waters, the distance from the facility reached in 48 hours at maximum current. (Not applicable)</li> <li>• Persistent and non-petroleum oils discharged into tidal waters, 15 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 15 miles, whichever is less, during flood tide.</li> <li>• Non-persistent oils discharged into non-tidal waters, the distance from the facility reached in 24 hours at maximum current. (Not applicable)</li> <li>• Non-persistent oils discharged into tidal waters, 5 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide.</li> <li>• Spill trajectory or model may be substituted if acceptable to COTP.</li> <li>• Procedures contained in the Environmental Protection’s Agency’s regulations on oil pollution prevention may be substituted for non-tidal and tidal waters.</li> <li>• COTP may require additional sensitive elements to be protected depending on trajectory.</li> </ul>	N/A
	Section
	N/A
	Section 7
	Appendix D & Appendix H

**Figure E.3. USCG OPA 90 Cross Reference (continued)**

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN PLAN
	<b>Vancouver</b>
5. Disposal plan This subsection must describe any actions to be taken or procedures to be used to ensure that all recovered oil and oil contained debris produced as a result of any discharge are disposed according to federal, state, or local requirements.	
<b>c) Training and Exercises</b>	
1. Training procedures of the facility owner or operator must meet requirements of §154.1050.	Appendix A
2. Drill procedures of the facility owner or operator must meet requirements of §154.1055.	Appendix A
<b>d) Plan Review and Update Procedures</b> Plan review and update procedures of the facility owner or operator must meet requirements of §154.1065 and any post-discharge review of the plan to evaluate and validate its effectiveness.	Page vi and Section 1.3
<b>e) Appendices</b>	
1. Facility-specific information – principal characteristics	
i) Physical description of the facility must include mooring areas, transfer locations, control stations, locations of safety equipment and location and capacities of all piping storage tanks.	Sections C.1 – C.2, Figure C.3
ii) Identify sizes, types and number of vessels the facility can transfer oil to or from simultaneously.	Section C.2, p. C-3
iii) Identify the first valve(s) on piping separating transportation-related and non-transportation-related areas. If piping serves tank vessels from a manifold it is considered the first valve.	Appendix C, Figure 1.7
iv) The oil(s) and hazardous material handled, stored or transported in bulk must be documented and include the following: <ul style="list-style-type: none"> <li>• Generic/chemical name</li> <li>• Description of appearance and odor</li> <li>• Hazards involved with handling or discharge</li> <li>• Firefighting procedures and extinguishing agents for oil/hazardous materials</li> </ul>	Appendix D, Section 7.1
2. List of contacts must include primary and alternate personnel, personnel from paragraph (b) (3) (iv), and Federal, state and local officials.	Figure 3.3
3. Equipment list and records must include the following: <ul style="list-style-type: none"> <li>• List of equipment and facility personnel required to respond to an average most probable discharge, as defined by §154.1020</li> </ul>	Appendix D
<ul style="list-style-type: none"> <li>• List of equipment belonging to an oil spill removal organization as described in §154.1028; unless the organization has been classified by the Coast Guard to equal or exceed the response capability needed by the facility</li> </ul>	Figures 7.1 & 7.3, Appendix B
<ul style="list-style-type: none"> <li>• When it is necessary for the appendix to contain a listing of response equipment, it shall include the following: skimmers; booms; dispersant application; in-situ burning; bioremediation equipment and supplies, and other equipment used to apply other chemical agents on the NCP Product Schedule; communications, firefighting, and beach cleaning equipment; boats and motors; and heavy equipment</li> </ul>	Section 7.1

**Figure E.3. USCG OPA 90 Cross Reference (continued)**

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN PLAN
	<b>Vancouver</b>
<ul style="list-style-type: none"> <li>• This list must also include specifications for each piece of equipment as follows:               <ol style="list-style-type: none"> <li>1) type, make, model, and year of manufacture,</li> <li>2) for oil recovery devices, the effective daily recovery rate,</li> <li>3) for containment boom, the overall boom height and type of end connectors,</li> <li>4) spill scenario in which the equipment will be used, total daily capacity for storage and disposal of recovered daily oil,</li> <li>6) for communication equipment, the type and amount of equipment intended for use during response activities,</li> <li>7) location of equipment, and</li> <li>8) date of last inspection.</li> </ol> </li> </ul>	Section 7
4. Communications plan must describe the primary and alternate method of communication during discharges, including communications at the facility and at remote locations.	Section 7.1.10
5. Site specific safety and health plan must describe the safety and health plan to be implemented. This appendix may reference another existing plan requiring under 29 CFR 1910.120	Section 2.7
6. List of acronyms and definitions must include all definitions that are critical to understanding the response plan.	Appendix I