

**Interoffice
Communication**

To: T. G. Grumbles

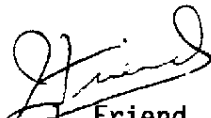
From: J. Friend
Date: July 12, 1989

Subject: Pipeline Emergency Response Plans

VISTA

Per your June 28, 1989 memo on the referenced subject, attached you will find answers prepared by Stan Allen for all questions you posed. We have a lot of work to do on this subject and it will take significant resources.

On another pipeline issue, I ask for your help to get some attention paid to it. A few months ago I heard the business people talking about converting the Certainteed VCM line (now out of service) to an EDC line between LCVCM and PPG. More recently, I've heard about a benzene pipeline project between LCLAB and the Citgo refinery. In both cases I asked if anyone has discussed the issue of "does Vista want to get into the business of having pipelines handling what are sometimes called extremely hazardous chemicals". I know some companies who have policies ruling out such activities (i.e. PPG says they will not have an EDC pipeline). Shouldn't Vista discuss this from a generic standpoint before too much time and effort is spent on these projects? It seems ironic to me that we are discussing pipes within pipes for plant sewers that may contain some hazardous materials at times and at the same time we are talking about converting old, cross-country pipelines to handle pure EDC and benzene. I am sure the latter can be done safely; but do we want to do it, and if so, what standards should apply. I'd appreciate your help in surfacing this issue for discussion in Houston.


J. Friend

tm
Attachment

cc: JAD THH KSA RAC

VVV 000009407

Interoffice
Communication

To: John Friend

From: K. S. Allen
Date: July 10, 1989

Subject: Response to Tom Grumbles Pipeline Emergency Response Plan
Letter dated 6-28-89

VISTA

1. Are there written plans for pipeline incident response?

This is a difficult question to answer due to the complexity of the current pipeline situation. However, in summary, we presently do not have adequate emergency response procedures for the LCCC pipelines. Status of each individual line or facility is given below.

Vista Operated Facilities

•Ethylene Dome Compressor Station

Emergency Response Plan Status

We have a written procedure, however, it needs to be reviewed and updated.

Vista Operated Pipelines

•6" Ethylene Dome Line
•6" Ethylene Maplewood Line
•6" VCM Certainteed (dead) 1990 EDC

No existing procedure⁽¹⁾
No existing procedure⁽¹⁾
Not Required

Vista Owned Pipelines

•6" Ethane Mont Bellview (Conoco operated)
•6" Ethane Oxy (Conoco operated)
•6" VCM Certainteed (dead)

Conoco has emergency manuals.
Conoco has emergency manuals.
Not required

Undetermined Operated/Owned Pipelines

•6" Kerosene Oxy
•36 lines between Vista & Conoco(Ost)

Oxy has a current emergency plan. However, Oxy denies being the operator.
No known emergency plan.

⁽¹⁾A pipeline consultant has been hired to develop an emergency procedure for this line.

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2. Who is responsible for the response?

The "operator" of the facility or pipeline is always responsible for the response (unless there is a contractual agreement between the "operator" and another party stating a different arrangement). For pipelines operated by Vista the individual operating unit would be the responsible party.

John Friend
July 10, 1989
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3. What do our agreements say for pipelines owned by the supplier, such as PPG, in regards to emergency response?

This question should be addressed to Vista's Legal Department as it concerns interpretation of an existing agreement. According to the DOT regulations (because we are not the operator or owner) we have no emergency response obligation other than to inform the supplier of the pipeline incident.

Attached to this letter is a listing of emergency requirements for pipelines according to the DOT Pipeline Safety Regulations Part 192. This was included just to give you an idea of what we are up against concerning emergency response, training and public education.



K. S. Allen

smb
Attachment

c: CRD NER DER PDC
RAC MDB JGC - VCM

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EMERGENCY PLAN - PART 192 OF DOT REGULATIONS

Section 192.615

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

1. Receiving, identifying and classifying notices of events which require immediate response by the operator.
2. Establishing and maintaining adequate means of communication with appropriate fire, police and other public officials.
3. Prompt and effective response to each emergency, including the following:
 - (i) Gas detected inside or near a building.
 - (ii) Fire near or directly involving a pipeline facility.
 - (iii) Explosion near or directly involving a pipeline facility.
 - (iv) Natural disaster.
4. The availability of personnel, equipment, tools and materials as needed at the scene of an emergency.
5. Actions directed toward protecting people first and then property.
6. Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.
7. Making safe any actual or potential hazards to life or property.
8. Notifying appropriate fire, police and other public officials of pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.
9. Safely restoring any service outage.
10. Investigation of failures as soon as possible.

(b) Each operator shall:

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1. Furnish necessary supervisors with latest edition of emergency procedures.
2. Train appropriate operating personnel and verify that the training is effective.
3. Review employee performances after each emergency to verify that procedures are adequate.

- (c) Each operator shall establish and maintain liaison with fire, police and other public officials to:
1. Learn responsibility and resources of each government organization.
 2. Acquaint officials with the operator's ability to respond to an emergency.
 3. Identify the types of pipelines emergencies of which the operator notifies the officials.
 4. Plan for mutual assistance between operator and officials to minimize hazards to life or property.
- (d) Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations and persons engaged in excavation related activities to recognize a pipeline emergency for the purpose of reporting it to the operator or the appropriate public officials. The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.

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