Attachment 3

Gulf Sulphur Services Ltd., LLLP

Emergency Response Plan

Submitted May 6 2014

EMERGENCY RESPONSE PLAN
(ERP)
Tampa Terminals

GSS

Gulf Sulphur Services

Emergency Response Plan
Tampa Terminals

Hookers Point
1015 McCloskey Blvd
Tampa, FL 33605
(813) 248-4949

&

Port Sutton
4388 Pendola Point Rd.
Tampa, FL 33619
(813) 248-2074

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Initial Steps to Take in the Event of an Emergency

1. **SAFETY FIRST**: Take all actions necessary to protect the life and health of all persons in the area.

2. **CALL FOR HELP IF IMMEDIATE DANGER TO LIFE AND HEALTH**: If danger is not immediate, these calls will be made by the Emergency Response Plan (ERP) Administrator.

   ONSITE

Hookers Point	Dial 248-4949
Port Sutton	Dial 248-2074

   OFFSITE Dial 911

3. **NOTIFY:**

   Notify all those identified in the Chain of Command.

   Contact all personnel, contractors, visitors on site and direct them to either evacuate the Terminal or to stay out of the incident perimeter, as appropriate.

Chain of Command

ERP Administrator/ Incident Commander	**Mario Gomez**	
	Office:	(813) 248-4949
	Mobile:	(813) 526-0545
ERP Coordinator	**Mona Sheraidah**	
	Office:	(813) 248-2074
	Mobile:	(813) 230-5175
Alternate Incident Commander Hookers Point	**Lead Operator**	
	Office:	(813) 248-4949
Alternate Incident Commander Port Sutton	**Lead Operator**	
	Office:	(813) 248-2074

PRIMARY CONTACT LIST

Contacts	Day Time Numbers	After Hour Numbers
FIRST RESPONDER		
Operation Manager	(435) 630-4096	(435) 630-4096
Police Department	(831) 242-3800	
Fire Department	(813) 274-7011	
FBI Branch Office	(813) 253-1000	
Tampa General Hospital	(813) 844-7000	
Ambulance	911	
United States Coast Guard	(813) 272-5116	
Hillsborough EPC	(813) 627-2600	
Tampa Port Authority	(813) 905-7678	
National Response Center	(800) 424-8802	
LEPC	(727) 570-5151	
Response Contractors		

SECONDARY CONTACT LIST

Contacts	Day Time Numbers	After Hour Numbers
Safety Director	(281) 673-1153	(832) 540-6789 (713) 932-6525
General Manager	(281) 673-1119	(801) 694-6770
Unit Leader	(281) 673-1114	(281) 732-6136
Group Leader	(801) 944-6516	(801) 694-5621
COO	(801) 944-6600	

Potential On-Site Hazards

Hydrogen Sulfide (H_2S)

H2S is a colorless, flammable, hazardous gas that typically has the characteristic of a "rotten egg" odor. Molten Sulphur contains trace amounts of H_2S gas. Therefore, small amounts of H2S may be emitted from the tanks' vents during normal operations. In addition, H2S may also be emitted during truck loading or marine vessel discharge. Accordingly, small amounts of H2S may be present on-site. Fans are strategically located near the loading rack to sheer and dissipate H_2S concentrations during truck loading operations. H_2S is heavier than air and dissipates rapidly. Offsite impact of H_2S at toxic concentrations is very unlikely; however, should toxic concentrations of H_2S be detected, precautions should be taken by local officials. OSHA Guidelines – Permissible Exposure Limit (PEL): **General Industry:** 20 ppm (ceiling) with the following exception: if no other measurable exposure occurs during the 8-hour work shift, exposures may exceed 20 ppm, but not more than 50 ppm (peak), for a single time period up to 10 minutes; IDLH is 100 ppm.

Molten Sulfur

Molten Sulphur is stored in tanks and associated piping and maintained at a temperature between 250 and 275 degrees F. Molten Sulphur is capable of causing severe burns if it should come into contact with skin. Molten Sulphur solidifies very rapidly at temperatures below 241 degrees F. Molten sulphur is flammable and burns at a slow rate. Molten sulphur fires can be extinguished with steam or water.

Steam

Steam for both sites is produced in the boiler plants for each site, and flows through most of the onsite piping. Thus, all pipes should be considered as hot. The steam is maintained at approximately 300 degrees and is capable of causing severe burns if it should come into contact with the skin.

Sulfur Dioxide (SO_2)

SO_2 is a colorless, nonflammable, hazardous gas that has a pungent odor. Sulfur Dioxide is emitted when sulphur burns, so SO2 gas can be present in the tank farm area but only if there is a sulphur fire. Offsite impact of SO_2 is unlikely; however, should a fire in a sulphur tank produce enough SO_2 precautions should be taken by local officials. OSHA Guidelines – Permissible Exposure Limit (PEL): 5 ppm averaged over an eight hour work shift; IDLH is 100 ppm.

SECTION I: General Information

1.1 Introduction

The Gulf Sulphur Services (GSS) Tampa Terminals store and handle bulk molten sulphur. At both terminals, sulphur is received as molten via marine vessel and transferred to internal steam coil tanks where it is stored. The molten sulphur is then loaded into tanker trucks and delivered to various end users in the area.

At both terminals, molten sulphur is heated to approximately 270 degrees F via steam produced onsite by natural gas boilers. Most heated equipment is insulated; however, exposed piping and equipment should be considered hot. Other potential hazards at these terminals are H_2S gas and SO_2 gas (generated only when sulphur burns).

Hookers Point:
Located at 1015 McCloskey Blvd Tampa Florida 33605, has eight molten sulphur tanks with internal steam coils. Tanks 1 – 4 are located on the north side of the property and tanks 5 – 8 are located south of the control room and truck loading area. Marine vessels connect to existing piping on the dock located on the east side of the property and discharge to the tanks. Molten sulphur is then transferred from the tanks to trucks via loading racks located at the control building

Port Sutton:
Located at 4388 Pendola Point Rd, Tampa, FL 33619, receives molten sulphur from marine vessels and stores it in 6 tanks which have internal steam coils. Steam is produced by the boilers located in the boiler room. Boilers are heated with natural gas and use liquid propane as a backup fuel. The molten sulphur is then transferred from the tanks to trucks via loading racks located at the scale house.

1.2 Purpose

This Emergency Response Plan and Business Continuity Plan (ERP/BCP) is to be utilized by all operation personnel in the event of a fire, explosion, accidental release, or other natural or man-made emergencies. The purpose of this plan is to minimize hazards to human health, the environment and property while helping the operation regain full operating status as quickly as possible. The intent of this plan is to protect the work force, the surrounding community, the environment and property from fire, explosion, or any unplanned sudden or non-sudden accidental release of hazardous or flammable commodities at this location, or other natural disasters. This plan covers only those operations that include the scope of activity of products listed in section 1.6.

1.3 Implementation

In the event that one or more of the following emergencies occur, this contingency plan will be implemented immediately.

- Fire: Any fire or potential fire that involves a commodity which has the potential to spread, or has the potential to release hazardous gas. (Refer to Sect. 5.2)

- Spill/Uncontrolled release of materials: Any release or potential release of hazardous material, petroleum-based material, or any material that may cause undesirable environmental damage. (Refer to Sect. 5.3)

- Hurricane/Tornado: Any incident related to weather or acts of God, which cause the facility to be in imminent danger. (Refer to Sect. 5.5 & Sect. 5.6)

1.4 Facility Owner / Operator Information

Facility Name: Gulf Sulphur Services – Hookers Point
Address: 1015 McClosky Blvd, Tampa, FL 33605
Phone: (813) 248-4949
Fax: (813) 248-5734
County: Hillsborough

Facility Name: Gulf Sulphur Services – Port Sutton
Address: 4388 Pendola Point Road, Tampa, FL 33619
Phone: (813) 248-2074
Fax: (813) 248-5427
County: Hillsborough

Operations Manager: Mario Gomez
Address: 1015 McClosky Blvd, Tampa, FL 33605
Office: (813) 248-4949
Mobile: (813) 526-0545

General Manager: Beau Harris
Address: 16800 Greenspoint Park Drive Suite 120N Houston, TX 77060
Office: (281) 673-1119
Mobile: (801) 694-6770

Business Unit Leader: Jack Cohn
Address: 16800 Greenspoint Park Drive Suite 120N Houston, TX 77060
Office Main: (281) 673-1084
Office Direct: (281) 673-1114
Mobile: (281) 732-6136

1.5 Authorization of Resources

I hereby authorized the emergency coordinators at these facilities to commit the necessary resources in order to prevent and minimize harm to human health, the environment and property in the event of an emergency at the facility.

_____ _____

Beau Harris
VP and Director of Operations
Gulf Sulphur Services

Date

1.6 Products/Materials On-Site

Below is a detailed listing of materials and chemical products located on both sites. Consult with the operations manager or other emergency coordinator for the specific location of these products. Safety Data Sheets (SDS) for all products are maintained in the operations area. See Section 4.2 for emergency equipment and supplies.

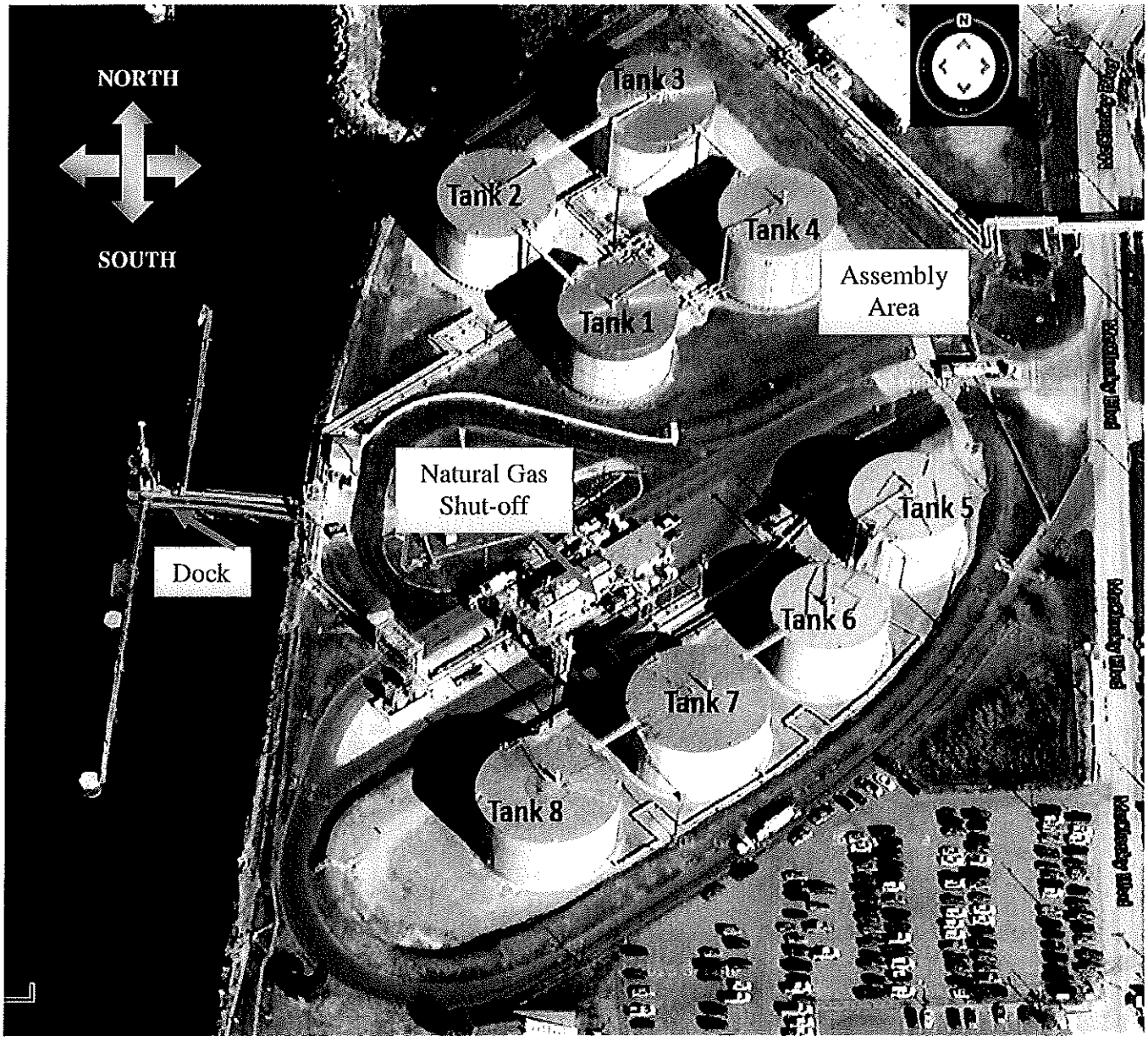
Material Name (Trade Name)	DOT Haz Class	Description	UN/NA Number	NFPA Rating	Notes
Diesel Fuel	3	(Only @ Hookers Point) Back-up fuel source for boilers. Stored in two (2) 8,500 gallon AST's.	NA 1993	1 / 2 / 0	
Molten Sulphur	9	Stored in six (6) 15K ton AST's @ Port Sutton and six (6) 10K ton AST's and two (2) 15K ton AST's @ Hookers Point	NA 2448	2 / 1 / 0	Temp is >/= 250 F
Natural Gas (Pipeline Quality)	2.1	Primary fuel source for boilers	UN 1954	1 / 4 / 0	
Oil, Lubricating - Petroleum Based	Not Appli.	Less than 10 gallons, stored in the maintenance shop and used for maintenance purposes.	Not Applicable	1 / 1 / 0	
Propane	2.1	(Only @ Port Sutton) Back-up fuel source for boilers. Stored in eight (8) horizontal AST's.	UN 1978	2 / 4 / 0	

1.7

a. Facility Map - Hookers Point

The assembly area for emergency evacuations is the Exit Gate.

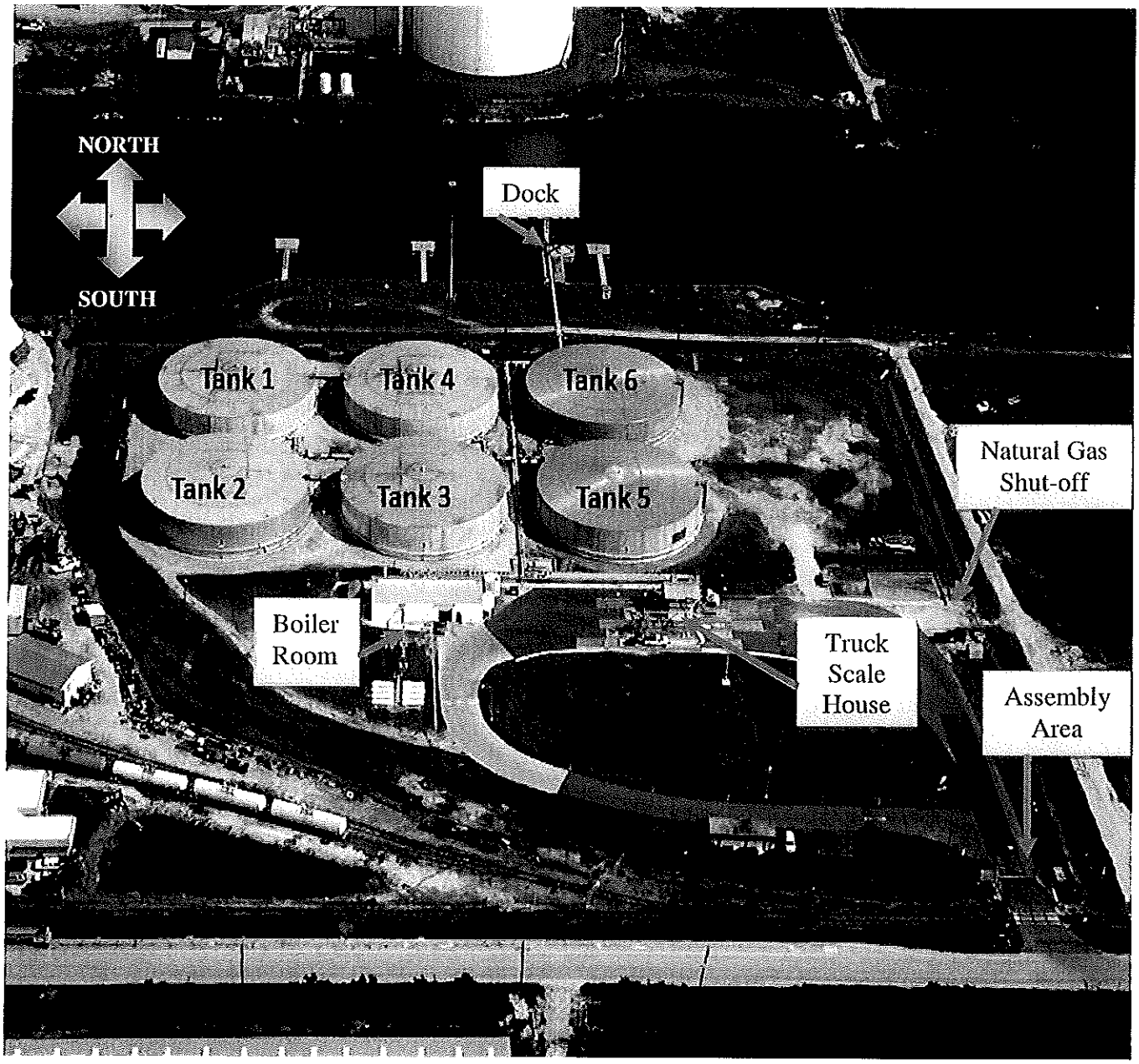
If SO2 or other hazard is in the vicinity, then adjust your route to safely arrive at the assembly area.



b. Facility Map – Port Sutton

The assembly area for emergency evacuations is the Exit Gate.

If SO2 or other hazard is in the vicinity, then adjust your route to safely arrive at the assembly area.



SECTION II: Emergency Procedures

2.1 Emergency Preparedness

Each location is responsible for taking appropriate preventative measures as well as having emergency supplies and a Disaster Recovery kit on-site. See Section 4.2 for listing of emergency equipment and supplies.

Prevent or reduce disaster damage in your facility by taking the following precautions:

1. Install emergency lights that turn on when the power goes out.
2. Know how to close the gas valves and keep a wrench handy for that purpose.
3. Install shutters that can be closed to protect windows from damage caused by debris blown by a severe storm.
4. Purchase a NOAA Weather Radio with a tone alert feature. Keep it on and when the warning signal sounds, listen for information about possible severe weather and protective actions to take.
5. Make sure that at least one member of your team is trained in first aid and CPR and knows how to use an automated external defibrillator (AED).

2.2 *Command Structure & Personnel*

Emergency Coordinator & Communication Clerk

In the event of an emergency, the Facility Manager and the Site Coordinator are empowered to act as the Emergency Coordinator (EC). The Emergency Coordinator will act as the Incident Commander until relieved by municipal response agencies. They are responsible for directing facility personnel and resources to safely mitigate any facility emergency. (See Appendix 4.3 for EC responsibilities.)

NAME	TITLE	OFFICE PH	CELL PH
Mario Gomez	Operations Manager	(813) 248-4949	(813) 526-0545
Mona Sheraidah	Coordinator	(813) 248-2074	(813) 230-5175

There will be an Emergency Coordinator available (either on the premises or on call) at ALL times.

Communications Clerks

In the event of an emergency, the following individuals are empowered to act as the Communications Clerk (CC) in order of preference. See Appendix 4.1 for CC definition.

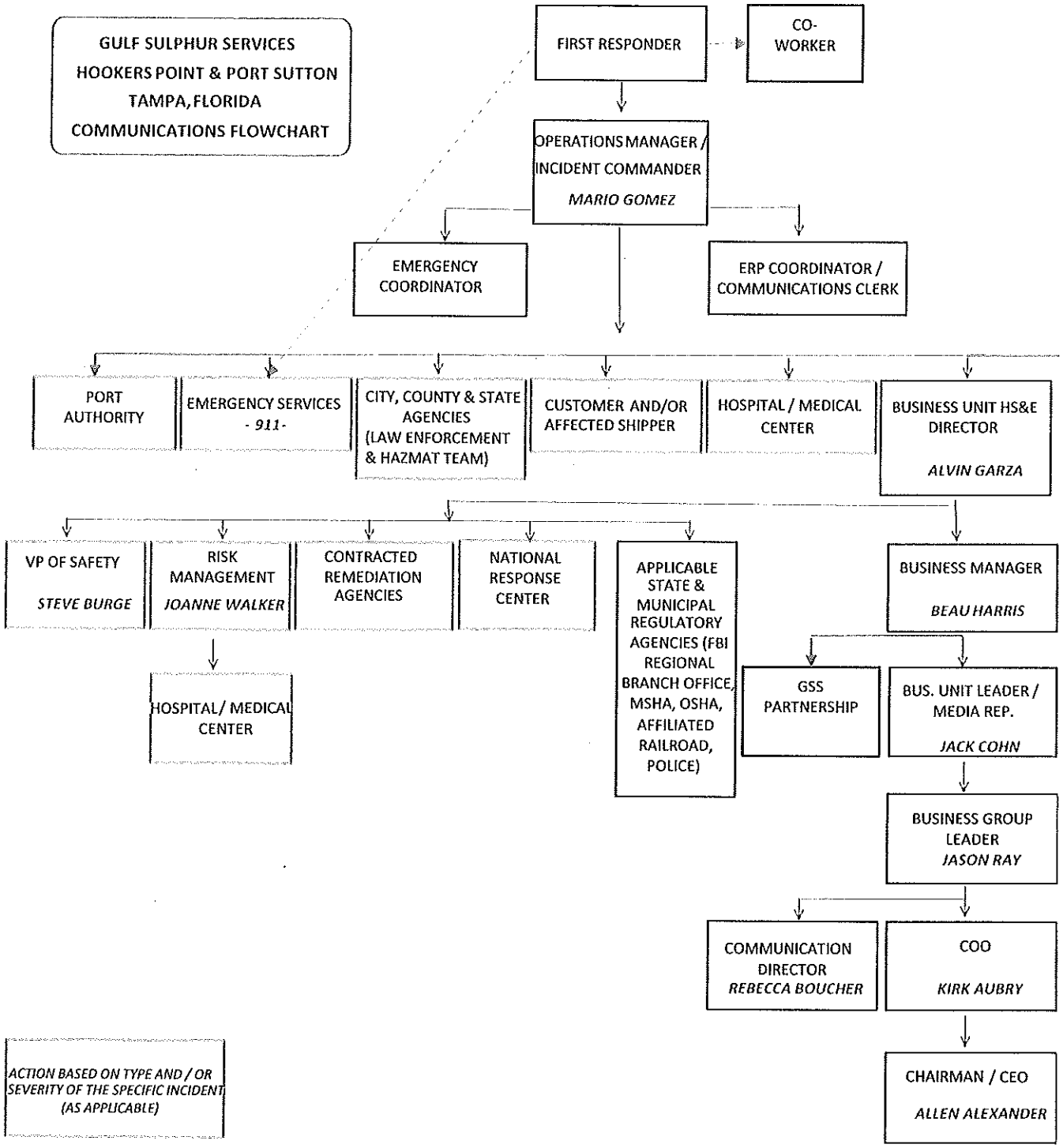
NAME	TITLE	OFFICE PH	CELL PH
Mario Gomez	Operations Manager	(813) 248-4949	(813) 526-0545
Mona Sheraidah	Coordinator	(813) 248-2074	(813) 230-5175

Company Senior Management

In the event of an emergency, the following individuals are to be contacted following the communications flowchart in section 2.3.

NAME	TITLE	OFFICE PH	CELL PH
Alvin Garza	Director, SH&E	(281) 673-1153	(832) 540-6789
Beau Harris	General Manager	(281) 673-1119	(801) 694-6770
Jack Cohn	Business Unit Leader	(281) 673-1114	(281) 732-6136
Jason Ray	Business Group Leader	(801) 944-6516	(801) 694-5621

2.3 *Communications Flow Chart*



Emergency Operations Center

The operations control room will serve as the emergency operations center (EOC) for any emergency affecting the operation. If this office is untenable due to fire, vapor release or evacuation a temporary EOC will be established at the Assembly Area.

If an off-site EOC is established the Emergency Coordinator will bring the following material to ensure continuity of communications and response:

1. Copy of this Emergency Response Plan
2. Copy of facility MSDS book
3. Customer contact list
4. Means of communication (cellular telephone, terminal portable radio)
5. Terminal roster of on-duty personnel and visitor sign-in sheet for personnel accountability at the gathering point in the event of an evacuation
6. Lead Operator shift reports

2.4 Emergency Notification System

The site uses company provided cell phones for normal operating communications. The site emergency notification system will use these cell phones for notification of both initial emergency and personnel notification of emergency type. Prior to being allowed into the operations area, all employees, contractors and visitors will be provided with a safety briefing, which includes this notification system and incident coding.

Employees are trained and will receive periodic re-training on incident reporting and the notification code system. Records of this training will be maintained as part of the site safety training procedures.

COLOR CODE	DEFINITION	REQUIRED ACTION
	Immediately Evacuate	Shut down all equipment, all personnel assemble at the exit(s)
YELLOW	**Spill Response**	Every available trained person respond to the given location of the incident
BLUE	**Fire**	911 Note: For sulphur tank fire, see Sect. 4.2.1
GREEN	**Personal Injury**	Closest person respond to the given incident location, contact the Manager
CLEAR	**All Clear**	Incident has ended, return back to normal work. (NOTE this can only be given by the Operations Manager.)

The Operations Manager is the only person authorized to give the all clear command, which will be based upon incident conditions, local responders or other authority.

Upon notification or realization of an emergency condition, the Emergency Coordinator will use the appropriate action guides to take protective actions and make notifications to necessary off-site resources and internal chain of command contacts (pages 3 & 4). The Operations Manager and/or the HS&E Director will make all required notifications to state and federal agencies.

During ANY emergency condition, the Emergency Coordinator's actions must be based upon the following decision factors:

1. Protection of life, health, and safety of site employees, contractors, visitors and the general public.
2. Protection of the environment including surface water, air, and land receptors.
3. Protection of property, equipment, and customer products.
4. System and business restoration.

In no case will business restoration take priority over the protection of human health and safety, the environment or property protection.

If the Emergency Coordinator judges that the threat may extend to outside the facility, the Emergency Coordinator will notify, or cause to be notified, the proper authorities for notification and/or evacuation of individuals from affected off-site properties.

2.5 *Media Interaction*

All inquiries by the media shall be referred to:

Jack Cohn
Sr. Vice President
Gulf Sulphur Services
16800 Greenspoint Park Drive
Suite 120 N
Houston, TX 77060
Office (281) 673-1114

SECTION III: Appendices

3.1 Definitions

Communications Clerk (CC):
That person designated to make notifications, manage communications with outside resources and agencies and to document response activities and notifications during an emergency.

Emergency Coordinator (EC):
That person designated to act in the event of an emergency to bring events under control, and to notify or cause to be notified the proper authorities. The Emergency Coordinator is empowered to commit all resources that are needed, including commitment of funds for outside help. The EC may also be referred to as the Incident Commander until relieved by outside response agencies or qualified persons in their chain of command.

Emergency Operations Center (EOC):
A location identified to serve as a communications, command, and control point during the emergency. This is the location where the EC and Communication clerk will manage the incident from and where outside responders and resources will stage during the emergency.

Emergency Notification System:
A code spoken over the paging or terminal radio communication system, recognized by all personnel, to mean general alarm, requiring immediate response.

A General Alarm for this facility is:

CODE RED	EVACUATE IMMEDIATELY
CODE YELLOW	SPILL RESPONSE
CODE BLUE	FIRE
CODE GREEN	PERSONAL INJURY
CODE CLEAR	ALL CLEAR

3.2 Emergency Equipment & Supplies

The following is a list of emergency equipment maintained at this facility. Any response equipment that is utilized in an emergency must be replenished as quickly as possible. (Unless otherwise stated, the following is applicable for both facilities.)

a. Personal Protective Equipment
The maximum level of personal protective clothing employees are trained to use is EPA and OSHA Level C (as per 1910.120 HAZWOPER regulations).

The personal protective equipment used at this facility is:
1. Safety Glasses
2. Hard Hats
3. Goggles and Face shields
4. Hearing protection
5. Chemical resistant gloves
6. Steel toed boots

b. Facility Spill and Response Materials
1. Material Safety Data Sheet Book(s)
2. Chemical Inventory List

c. First Aid Kit(s)
To provide care for sick or injured personnel prior to transportation for treatment (if required). First Aid Kit(s) are located in the following fixed locations:
1. Mechanic's Shop
2. Control Room
3. Administration office (Port Sutton only)

d. Oil Sorbent and Pads to absorb spills.
Oil sorb and Pads are located in the Mechanics Shop.
NOTE: Any drums used to contain or clean up spilled hazardous materials must be properly labeled with HAZ MAT warning label, product name, UN number, date placed into container and fully sealed.

e. Fire Extinguishers (Dry Chemical)
To provide protection against Class A, B, and C fires, fire extinguishers are located throughout the facility and in the office areas, to include Class C Fire Extinguishers in the electrical rooms.

3.3 *Employee Emergency Responsibilities*

Emergency Coordinator & Alternate:

- Conduct an annual exercise
- Communications systems checked monthly with documentation
- Train all employees, to include new employees or those with new responsibilities. All training will be documented.

Team Members:

- Know the initial actions to be taken
- Track and maintain adequate stocks of response materials
- Know the evacuation routes and locations of the emergency operation center

First Responder (Site Personnel):

- Will understand what to do when an emergency occurs
- Will maintain adequate stock of response materials
- Will know the location of the command post
- Will know evacuation routes
- Will participate in an annual emergency action plan exercise
- Will be available to respond during operations hours
- Will call 911 in case of injury or potential for significant release

Operations Manager:

- Will ensure employees are sufficiently trained
- Will ensure that adequate stocks of response material are available
- Will ensure response equipment is maintained (safety showers, eye wash units, etc.)
- Will contact appropriate agencies identified in emergency action plan contact list
- Will conduct post emergency review (documented timeline of events)
- Will initiate emergency action plan exercise at least annually
- Will ensure remediation is completed, this includes the disposal of any wastes generated
- Will be available during routine operating hours
- Will be the primary point of contact with the First Responder
- Will report all findings to the General Manager within two business days
- Will perform the functions of the General Manager in their absence
- Will ensure all necessary reporting (EPA, DOT, State & Local) is completed in the prescribed time

General Manager:

- Will be able to be contacted during the normal operations hours
- Will perform the functions of the Operations Manager in his/her absence
- Will contact the customer and primary contact for the customer
- Will make a reasonable effort to contact the Manager
- Will participate in the annual emergency action plan exercise

Safety Director:

- Will be able to be contacted during the normal operations hours
- Will participate in the annual emergency action plan exercise
- Will assist Manager in ensuring all necessary reporting (EPA, DOT, State & Local) is completed timely
- Will assist in post emergency review (documented timeline of events)

Business Unit Leader:

- Will communicate all relative information to the company senior management
- Will assist in the post emergency review process
- Will participate in the emergency action plan exercise

3.4 Employee Training Outline

Employees at this location should have the following training as related to Emergency Response.

OSHA 1910.1200 Hazard Communication Awareness:

1. What constitutes a hazardous commodity?
2. What hazardous materials are handled at this site?
3. How are each of these transferred?
4. How is hazardous & non-hazardous waste handled and disposed of?
5. Which chemicals/commodities are present at the site?
6. How are materials identified by the placard?
7. What are the hazards of the materials located at this facility?
8. How to read an SDS (Safety Data Sheet)

OSHA 1910.38 Emergency Action Plan:

1. Emergency Coordinators
2. Implementation
3. Emergency Response Procedures
4. Emergency Equipment
5. Coordination Agreements
6. Evacuation Plan
7. Storage/treatment of spilled materials
8. Incompatible Wastes
9. General Alarms
10. Fire and Response Drills

OSHA 1910.57 Fire Extinguishers:

1. Annual fire extinguisher training

OSHA 1910.120 Hazardous Waste Operations and Emergency Response:

1. Site employees are trained to the First Responder-Operations level only.
2. First Aid and CPR

RECORD KEEPING:
All training records must be kept on file and retained in the individuals' training files.

3.5 First Responder Information Record

Name: _____ **Date/Time:** _____

Telephone Numbers:

Physical Location:

Type of Incident:

Name/Quantity of Material Released:

Potential Health/Environmental Hazards:

Injuries, (Number, and type) if any:

Reporting Log: *Documentation of date/time each contact was made*

Local Fire/Rescue/Police Notification:

Customer Contact:

GSS General Manager:

GSS Business Unit Leader:

SECTION IV: Specific Procedures

4.1 Emergency Evacuation Plan [redacted] CODE: RED

	Entity/Agency Name	Phone #'s
☎	**Fire Department:**	911
☎	**Police Department:**	911
☎	**Ambulance:**	911
☎	**National Response Center:**	(800) 424-8802
☎	**LEPC**	(727) 570-5151

PROCEDURE

STEP 1: First Responder (Lead Operator, Operator, Mechanic/Maintenance)

1. Witness to, or receives report of, emergency event
2. Notifies operations manager or his alternate, reporting briefly as much information as possible (Who, What, Where, When, How)
3. Provides first aid if needed and if trained to do so
4. Assesses situation and area if safe to do so
5. Shuts down valves, blow down lines, emergency shut off
6. Clears access ways for emergency personnel
7. Assigns traffic control and area sweepers
8. Evacuates non-essential personnel, drivers, contractors and visitors in the immediate area
9. If unable to remain in operations area, then reports to emergency assembly area, using alternate route if directed to do so

STEP 2: Incident Commander (Operations Manager, Coordinator)

1. Upon receipt of first responder report, determines Emergency Coordinator
2. Emergency personnel contacted as determined by flowchart and corresponding event section of facility's Emergency Response Plan (customer, regional management, state/federal agencies)

STEP 3: Emergency Coordinator (Operations Manager, Coordinator)

1. Contacts additional onsite personnel (mechanics, maintenance), contractors
2. Assess situation and area, determining alternate evacuation route and/or emergency assembly area
3. Ensures non-essential personnel, contractors and visitors are evacuated from the immediate area
4. Gathers additional information from First Responder
5. Monitors situation from emergency assembly area

STEP 4: ERP Coordinator (Coordinator or other personnel as directed)

1. Emergency Response kit
2. Emergency Response Plan
3. Chemical Inventory/MSDS
4. Schedules – Operations and Transportation
5. Visitors log
6. Records all necessary information
7. Received crew leader shift reports
8. Report of event
9. Statements from effected personnel

4.2 Fire CODE: BLUE

	Entity/Agency Name	Phone #'s
☎	**Fire Department:**	911
☎	**Police Department:**	911
☎	**Ambulance:**	911
☎	**LEPC**	(727) 570-5151

PROCEDURE

STEP 1: Incident occurs and fire results. **(NOTE: If this is a fire inside of a molten sulphur tank, then please refer to section 4.2.1, below)**

STEP 2: Terminal office is notified via radio or in person. The Emergency Coordinator (EC) is determined.

STEP 3: EC sounds the appropriate Emergency Warning or Code throughout the terminal.

STEP 4: EC assesses extent of emergency.
- Direct personnel to appropriately respond, OR
- Direct Evacuation and account for all personnel

STEP 5: EC makes outside Responder Notification to obtain assistance in emergency and make other necessary calls to sensitive receptors, as required.

STEP 6: Provide first aid or other assistance to injured persons.

STEP 7: Take steps to direct emergency responders to location of fire.

STEP 8: Secure perimeter during response. If necessary, obtain security.

STEP 9: EC contacts GSS Services Business Unit Leader, who will then provide updates to the appropriate entities.

STEP 10: Monitor situation, providing updates to GSS Operations Manager for required state and federal release/spill reporting.

STEP 11: Contact customer(s) affected. Please write information below:

Customer: _____ Phone: _____

Customer: _____ Phone: _____

STEP 12: Terminate Incident

STEP 13: Conduct investigation

STEP 14: Terminal Manger completes incident report

STEP 15: Corrective Action Review- Using established operator incident conference call process.

STEP 16: Complete remediation of any spilled materials and assure proper disposal of wastes.

All soil, debris, wastes, and liquids resulting from the release must be treated as Hazardous Waste until testing determines the waste to be non-hazardous. Any hazardous waste must be removed in accordance to Federal, State and Local laws. No waste should be removed without the knowledge and consent of the Emergency Coordinator.

Residues from fires or leaks will be solidified with appropriate inert absorbent and placed in appropriate DOT approved containers for transportation by an authorized disposal firm to permitted disposal facilities. Pumps, absorbents, and salvage containers are to be maintained at the facility for these purposes.

STEP 17: Prior to resumption of any transfer operation, any safety equipment used in an emergency will be cleaned or replaced and returned to a state of readiness.

NOTE: While terminal personnel routinely handle all of the products within the terminal while performing product transfers, large spills may expose employees to potential exposure levels above available personal protective clothing.

The terminal is equipped with portable A/B/C fire extinguishers and employees receive documented annual fire extinguisher training.

Employees are not trained, equipped or qualified to act beyond their first response training to act as a fire brigade or team. Firefighting efforts that involve uncontrolled spills of flammable liquids, fires involving ordinary combustibles beyond the incipient stage or that require more than one fire extinguisher will require notification of the local fire department in a timely manner.

In no case will the EC direct or allow employees to perform spill containment, fire suppression, clean up or offensive leak control beyond their training or PPE capability. Only properly equipped and trained responders will be used for these activities.

4.2.1 Molten Sulphur Tank Fire Response Procedure

The following details the appropriate response after a molten sulphur tank fire is identified at the Tampa Terminals.

- Tank fire occurs.
- On-site personnel shall immediately cease operations in the affected area and notify the Tampa Terminals Manager or qualified designee.
- The Tampa Terminals Manager or qualified designee shall provide first aid or assistance to injured persons or affected personnel, if necessary.
- The Tampa Terminals Manager or qualified designee shall assess the extent of the fire and:
    - Direct personnel to appropriately respond.
        - Engage Steam Suppression System
            1. Ascertain direction of plume; remain upwind.
            2. Open steam suppression valve on the affected tank. (See Steam Suppression System procedure.)
                - Personnel that initializes steam suppression valve must:
                    - Wear a Personal H_2S/SO_2 monitor
                    - Don an SCBA, if necessary
                    - Utilize the buddy system: the second person must watch from an upwind position at a safe distance.
            3. Maintain steam flow, monitor the smoke plume from a safe distance and document SO_2 levels at the terminal's perimeter fence line.

        Or

        - Direct evacuation and account for all personnel.

- The Tampa Terminals Manager or qualified designee is authorized to and may, without the need to seek or obtain further authorization from Company Senior Management, notify local emergency responders of a sulphur fire, to request assistance in extinguishing said fire, to assist in controlling emissions caused by a sulphur fire, and to notify adjacent and nearby property owners that may be affected by any emissions.
- The Tampa Manager or qualified designee shall secure the perimeter. If necessary, obtain additional security personnel.
- The Tampa Terminals Manager or qualified designee shall contact the GSS VP of Operations and provide an assessment of the incident. (See flowchart)
- The Tampa Terminal Manager or qualified designee shall contact the GSS Director of HSE and provide an assessment of the incident (See flowchart)

- The Tampa Terminals Manager or qualified designee shall notify Federal, State or Local agencies of a release or spill as required by law.
- All media requests for information (e.g., writers and/or reporters from newspapers, TV and radio stations, etc.) shall be referred to Jack Cohn at (281)673-1084, or mobile: (281)732-6136.
- Continue to monitor situation and update all parties as needed.
- Terminate incident – **Only the Tampa Terminals Manger or designated GSS Manager can clear the fire and approve the deactivation of the Steam Suppression System.**
    - To ascertain the fire is out, the Tampa Terminals qualified person or his designee shall use a SO_2 detector to ensure the emissions coming out of the sulphur tank center vent have no detectable levels of SO_2.
        - Tank top access requirements:
            - Personnel that conducts atmospheric monitoring at the tank center vent must:
                - Wear a Personal H_2S/SO_2 monitor
                - Don an SCBA.
                - Utilize the buddy system: the second person is to observe from the top of the tank stairs and don an SCBA.
- The Tampa Terminals Manager shall investigate and complete an occurrence report. A copy of the findings shall be forwarded to the GSS VP of Operations and appropriate Federal, State or Local agency.
- The Tampa Terminals Manager along with GSS Safety, Health and Environmental personnel shall complete a Root Cause Analysis (RCA) and develop action items.
- Complete any remediation of spilled materials and assure proper disposal of wastes.
- Prior to resumption of any transfer operation, all safety equipment used shall be cleaned or replaced and returned to a state of readiness.

4.3 Product Spill *CODE: YELLOW*

	Entity/Agency Name	Phone #'s
☎	**Fire Department:**	911
☎	**Police Department:**	911
☎	**Ambulance:**	911
☎	**United States Coast Guard**	(813) 272-5116
☎	**National Response Center:**	(800) 424-8802
☎	**LEPC**	(727) 570-5151

PROCEDURE

REFER TO THE SITE'S SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN

QUICK OVERVIEW OF IMMEDIATE COUNTERMEASURES

Overview of Countermeasures: A spill containment will never take precedence over the safety of personnel (see NOTE at bottom of this Procedure for more details on training and safety issues).

The following SWIMS procedure presents a quick overview of key countermeasures that should be taken when possible.

S - Stop the leak and eliminate the ignition sources, if can be done safely.
a. Eliminate all ignition sources in the immediate area.
b. Attempt to seal or somehow stop leak if can be done safely
c. Attempt to divert flow away from catch basins with a spill barrier or contents of a spill kit.
d. Where possible, do not let the material get into water ways.

W - Warn others
a. Yell out SPILL
b. Account for all personnel and ensure their safety
c. Notify contacts and response contractor as listed above

I - Isolate the area
a. Use Red or Yellow tape or other barriers.
b. Consider security issues

M - Minimize your exposure
a. Stay upwind
b. Utilize appropriate PPE
c. Refer to the material's SDS to ensure the product is handled appropriately

S - Standby to assist emergency response officials or contractor, if necessary

DETAILED PROCEDURES

STEP 1: Incident occurs and spill results.

STEP 2: Terminal office is notified via radio or in person. The Emergency Coordinator (EC) is determined.

STEP 3: EC sounds the appropriate Emergency Warning or Code throughout the terminal and contacts the manager to advice of emergency.

ALL WORK MUST BE STOPPED UNTIL THE ALL CLEAR SIGNAL IS SOUNDED.

The warning should include type and the amount of product spilled/leaked and location of the spill. Direction of current wind direction is requested of yard personnel by Emergency Coordinator.

STEP 4: If equipment is available that is capable of assisting with safely controlling the spill, i.e., bucket loader, then maneuver to the spill area as soon as possible and approach from an up wind direction.

STEP 5: An employee will be directed to cover or close any drains as soon as possible, if applicable. This employee will report back to the EOC that the drains are secured. This includes the spill containment pond outfall controls.

STEP 6: EC assesses extent of emergency.
- Direct personnel to appropriately respond, OR
- Direct Evacuation and account for all personnel

STEP 7: Provide first aid or other assistance to injured persons.

STEP 8: If damage assessment shows the spill is contained and can be handled by terminal personnel with available equipment and protective clothing, the EC will direct spill cleanup with terminal resources.

If extent of spill is beyond terminal capabilities the EC will make outside response contractor notification to obtain assistance and make other necessary calls to sensitive receptors, as required. The Tampa Terminals Manager or qualified designee is authorized to and may, without the need to seek or obtain further authorization from Company Senior Management, notify local emergency responders of a spill, to request assistance containing, controlling and cleaning up the spill, and to notify adjacent and nearby property owners that may be affected by any spill.

STEP 9: Secure perimeter during response. If necessary, obtain security.

STEP 10: Monitor situation, providing updates to GSS Operations Manager for required state and federal release/spill reporting. The Tampa Terminals Manager or qualified designee shall notify Federal, State or Local agencies of a release or spill as required by law.

STEP 11: EC contacts GSS Business Unit Leader, who will then provide updates to the appropriate internal and external entities.

STEP 12: Make notification to customer(s) affected. Please write information below:

Customer: _____ Phone: _____

Customer: _____ Phone: _____

STEP 13: Conduct investigation

STEP 14: Terminal Manger completes incident report

STEP 15: Corrective Action Review- Using established operator incident conference call process.

STEP 16: Complete remediation of any spilled materials and assure proper disposal of wastes.

All soil, debris, wastes, and liquids resulting from the release must be treated as Hazardous Waste until testing determines the waste to be non-hazardous. Any hazardous waste must be removed in accordance to Federal, State and Local laws. No waste should be removed without the knowledge and consent of the Emergency Coordinator and the HS&E Director.

Residues from fires or leaks will be solidified with appropriate inert absorbent and placed in appropriate DOT approved containers for transportation to an authorized disposal firm to permitted disposal facilities. Pumps, absorbents, and salvage containers are to be maintained at the facility for these purposes.

STEP 17: Prior to resumption of any transfer operation, any safety equipment used in an emergency will be cleaned or replaced and returned to a state of readiness.

NOTE: While terminal personnel routinely handle all of the products within the terminal while performing product transfers, large spills may expose employees to potential exposure levels above available personal protective clothing. Therefore, in no case will the EC direct or allow employees to perform spill containment, fire suppression, clean up or offensive leak control beyond their training or PPE capability. Only properly equipped and trained responders will be used for these activities.

4.4 *Medical Emergencies* *CODE: GREEN*

Entity/Agency Name	Phone #'s
Fire Department:	911
Police Department:	911
Ambulance:	911
Tampa General Hospital	(813) 844-7000
St. Joseph's Hospital	(813) 870-4000
National Response Center:	(800) 424-8802
LEPC	(727) 570-5151

PROCEDURE

STEP 1: Notify Emergency Coordinator via radio or in person.

STEP 2: Emergency Coordinator sounds appropriate Emergency Code throughout the terminal.

- *CODE: GREEN*

STEP 3: EC sends TRAINED Terminal First Aid/CPR personnel to assess and assist injured.

STEP 4: The personnel assisting the injured communicates to EC on the condition and need for outside assistance.

- *If it is a burn injury, then request that transporting vehicle/craft go to Tampa General Hospital (See appropriate map in section 5.4 for directions.)*
- *For all other injuries, then request that transporting vehicle/craft go to St. Joseph's Hospital. (See appropriate map in section 5.4 for directions.)*

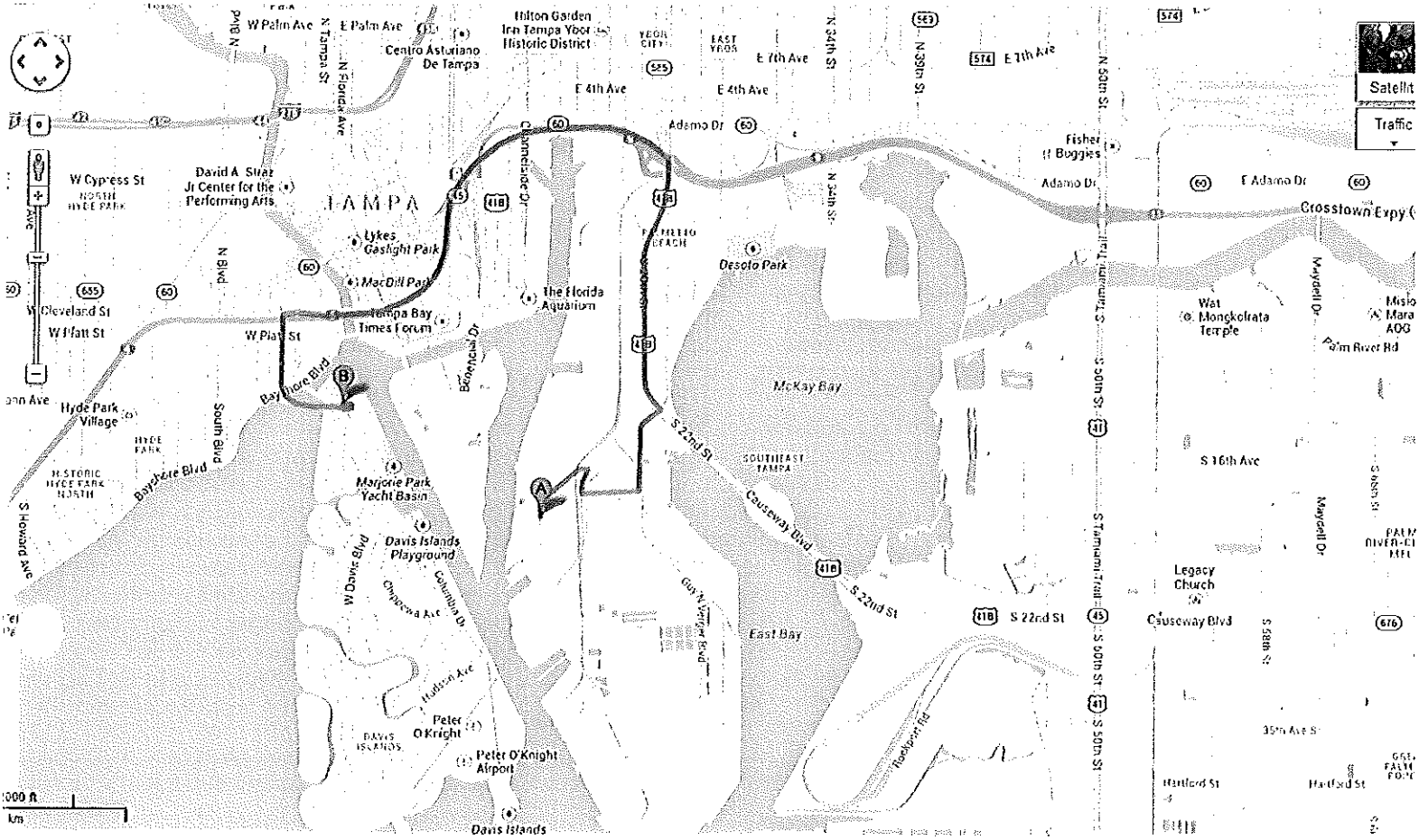
STEP 5: EC notifies outside assistance, if necessary OR injured is transported to nearest medical facility if injury is not serious.

STEP 7: EC notifies family or employee's company.

STEP 8: EC contacts Houston office.

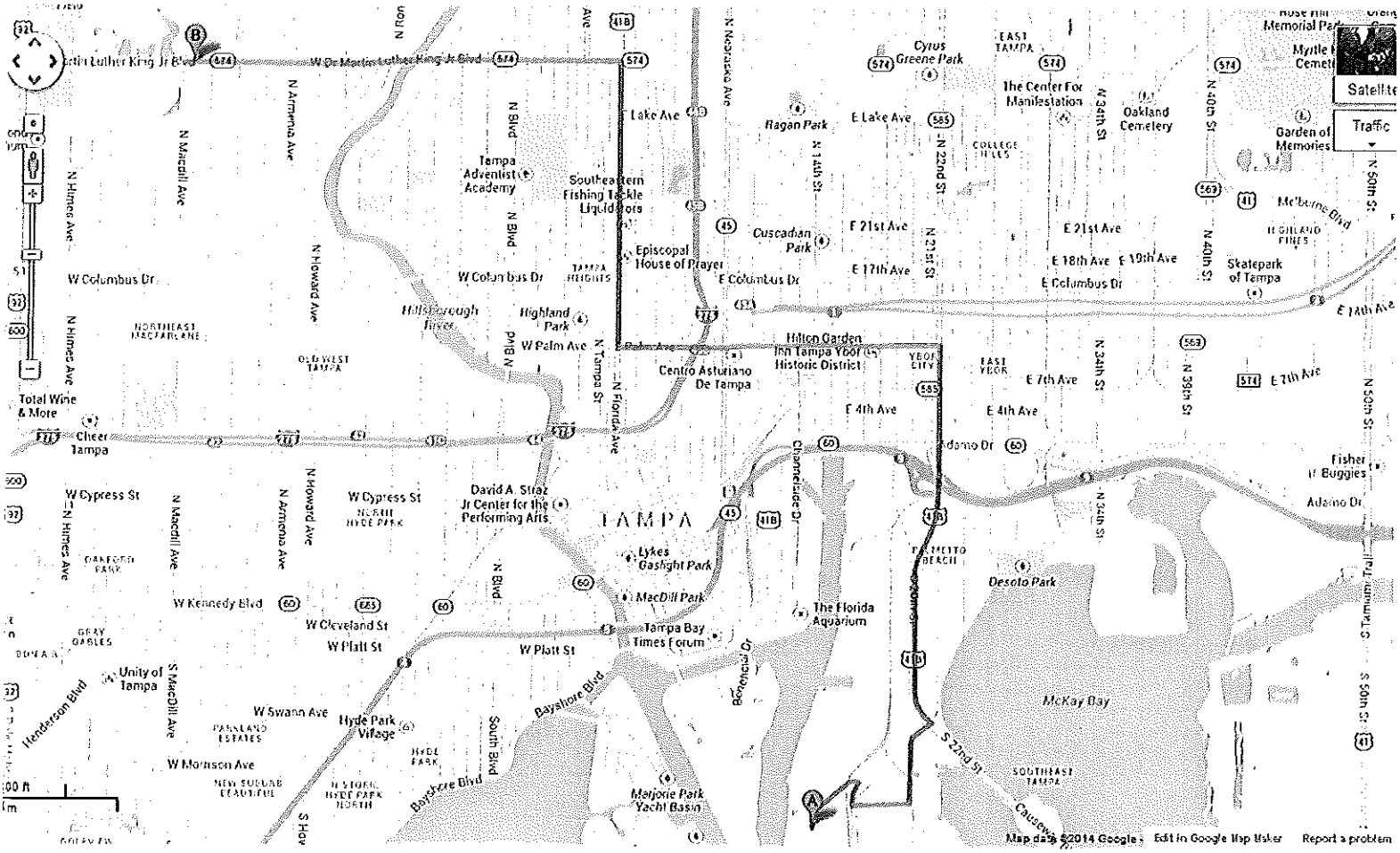
STEP 9: EC completes initial injury/accident report and begins investigations as per GSS and/or customer incident investigation process before resuming operation or use of equipment involved in the injury.

Route from Hooker's Point to Tampa General Hospital



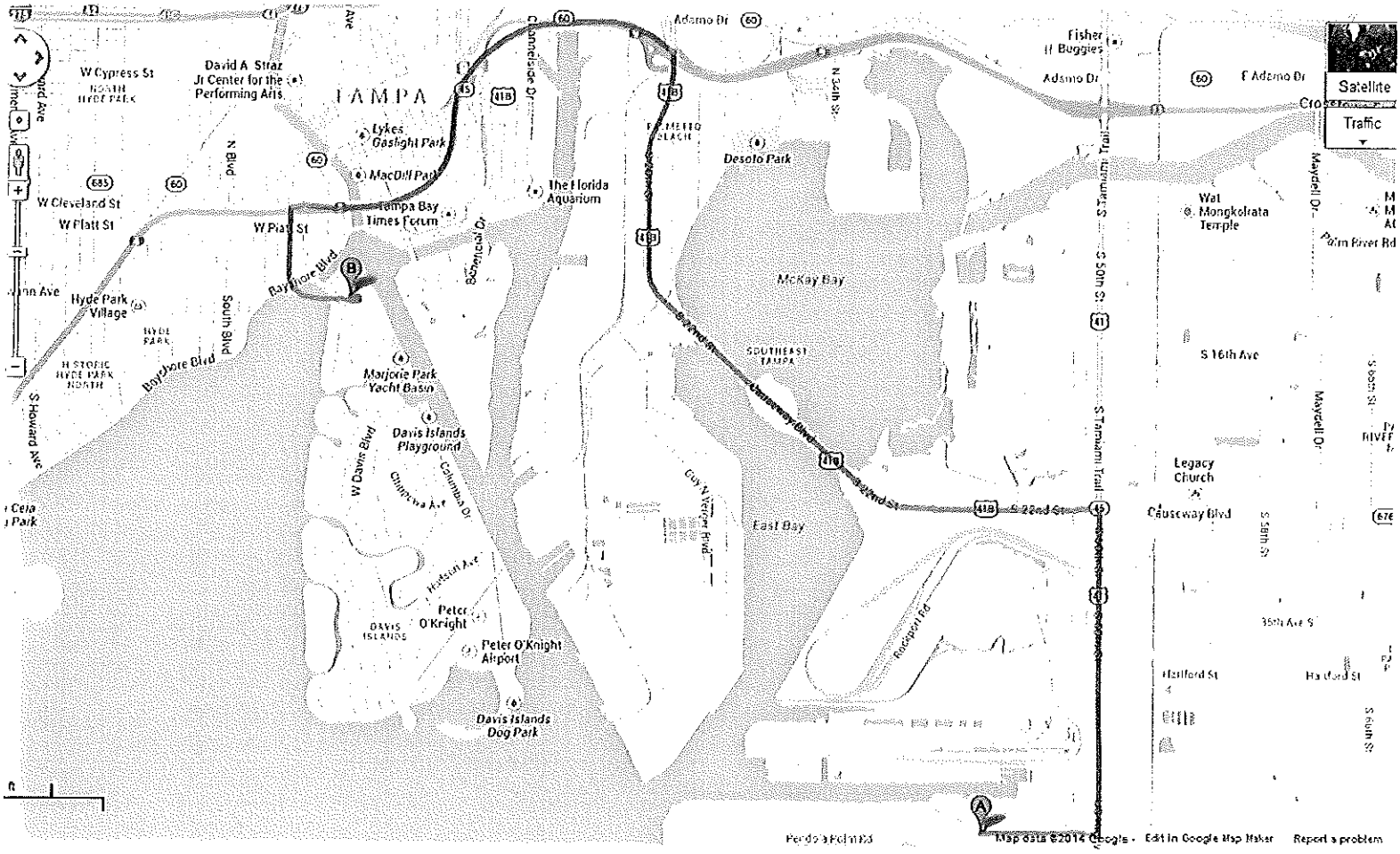
From: Hookers Point	**To: Tampa General Hospital**
1015 McCloskey Blvd	**1 Tampa General Cir**
Tampa, FL 33605	**Tampa, FL 33606**
(813) 248-4949	**(813) 844-7000**

Route from Hooker's Point to St. Joseph's Hospital



From: Hookers Point ***1015 McCloskey Blvd*** ***Tampa, FL 33605*** ***(813) 248-4949***	**To: St. Joseph's Hospital** **3030 W Dr Martin Luther King Jr. Blvd 33607** **Tampa, Florida** **(813) 879-4730**

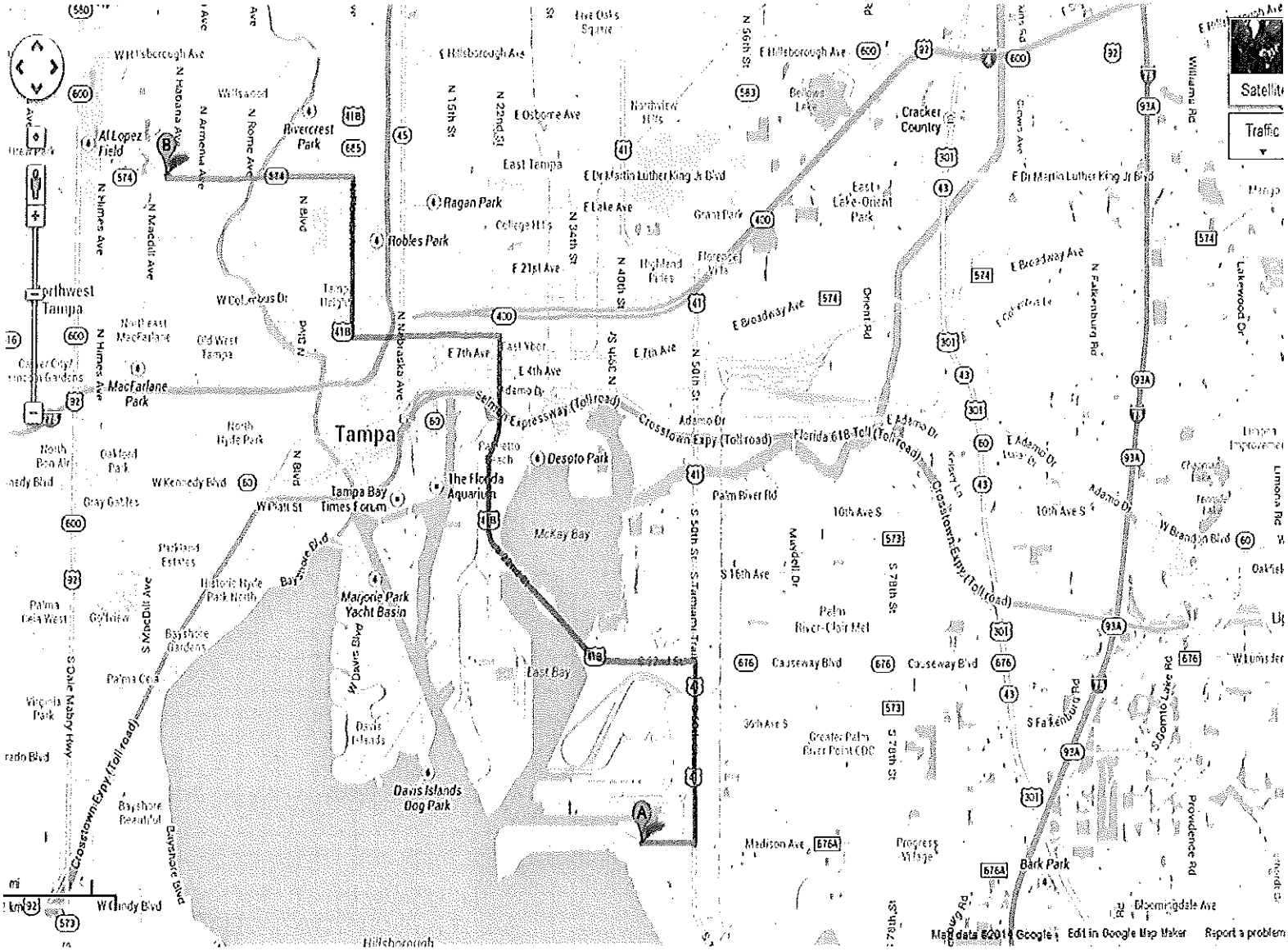
Route from Port Sutton to Tampa General Hospital



From: Port Sutton
4388 Pendola Point Rd.
Tampa, FL 33619
(813) 248-2074

To: Tampa General Hospital
1 Tampa General Cir
Tampa, FL 33606
(813) 844-7000

Route from Port Sutton to St. Joseph's Hospital



From: Port Sutton
4388 Pendola Point Rd.
Tampa, FL 33619
(813) 248-2074

To: St. Joseph's Hospital
3030 W Dr Martin Luther King Jr. Blvd 33607
Tampa, Florida
(813) 879-4730

4.5 Hurricane

	Entity/Agency Name	Phone #'s
☎	**National Weather Service:**	(817) 429-2631
☎	**Fire Department:**	911
☎	**Police Department:**	911
☎	**Ambulance:**	911

During Hurricane season (June-November) be aware of Hurricane advisories for Hurricane watches and warnings.

HURRICANE WARNING ISSUED

PROCEDURE

STEP 1: When a HURRICANE WARNING is issued a hurricane is imminent in 24 hours. An EC will be determined. If the warning was upgraded from a Hurricane Watch an EC was already established.

STEP 2: The EC will sound appropriate warning and facility shutdown procedures are initialized to include:

a. All transfers terminated.
b. Transfer equipment moved to central, protected location if possible
c. All power outlets shut off at the outbox
d. Steam systems safely shutdown following equipment procedures for unit shutdown.
e. Surface water drains open
f. Computer equipment and filing cabinets moved away from windows or protected with plastic covers.
g. Storm shutters or window covers applied if available (tape on windows is ineffective).

STEP 3: EC contacts appropriate agencies for community emergency response.

STEP 4: EC contacts appropriate owner and operator chain of command to report terminal status and further protective action.

STEP 5: Secure facility records, computers, and other important office documents for storage or for a move to another location.

STEP 6: Secure facility equipment, structures and above ground storage tanks.

STEP 7: Evacuate terminal immediately, if advised by local authorities.

STEP 8: After storm has passed and it is safe to do so, complete a report describing property and equipment damage, customer product damage or possible contaminations, theft of GSS and/or customer equipment or other loss and damages.

4.6 Tornado

	Entity/Agency Name	Phone #'s
☎	**National Weather Service:**	(817) 429-2631
☎	**Fire Department:**	911
☎	**Police Department:**	911
☎	**Ambulance:**	911
☎	**National Response Center:**	(800) 424-8802

TORNADO WATCH ISSUED

PROCEDURE

STEP 1: When a TORNADO WATCH is issued an EC will be determined.

STEP 2: The EC sounds appropriate warning.

STEP 3: Spotters are to look for approaching storms.

STEP 4: The EC will listen/watch the broadcast radio, such as a NOAA Weather Radio, or television for additional advisories.

STEP 5: EC makes appropriate contacts for community emergency response.

STEP 6 EC contacts GSS Services Corporation's Regional Office to provide updates.

STEP 7: Personnel may need to take shelter in a predetermined shelter area on site or a shelter nearby. See steps for Hurricane Warning.

TORNADO WARNING ISSUED

PROCEDURE

STEP 1: When a TORNADO WARNING is issued a tornado has been sighted in the area and/or is indicated by radar.

STEP 2: The EC will sound appropriate warning and personnel will take shelter onsite immediately.

STEP 3: After the storm has passed and it is safe to do so, complete a report describing property and equipment damage, customer product damage or possible contaminations, theft of GSS and/or Customer equipment or other loss and damages.

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