

Drill/Exercise Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 6

1445 Ross Avenue, 6 SF-RO, Dallas, Texas 75202-2733

Facility Owner and Name:

TXU De Cordova Company LP (TXU Energy)

FRP#: FRP-06-TX-00242

Qualified Individual:

Scott Diermann

Date: 08 / 23 / 2006

Participants:

Scott Diermann , Gary Spicer, David Rutledge, Robert Anderson(AQI)

Start time: 11:40 am

End time: 2:33 PM

EPA Evaluators:

Don Smith, Don Sharp, Mike Clonts

Was there a Facility Response Plan (FRP) on site?

Yes No N/A

Was the FRP utilized for the exercise?

Yes No N/A

Were drill/exercise records available for inspection?

Yes No N/A

Was a site safety plan utilized?

Yes No N/A

Exercise Scenario:

Small Discharge

Medium Discharge

Worst Case Discharge

Comment:

*Worst case scenario, as described by EPA: Failure of tank #2
Capacity: ~420,000 Bbls
Material: #2 Fuel Oil
Spill Pathway: As generally described in the FRP.
Weather conditions: Winter, significant rainfall, North winds.
Day/Time of incident: Friday night.*

Notification:

Was everyone on the notification list called?

Yes No N/A Not observed

NRC

Yes No N/A Not observed

Qualified Individual

Yes No N/A Not observed

Company Response Team

Yes No N/A Not observed

FOSC

Yes No N/A Not observed

Local Response Team (Fire dept./Cooperatives)

Yes No N/A Not observed

Fire Marshal

Yes No N/A Not observed

SERC

Yes No N/A Not observed

Police (*County Sheriff*)

Yes No N/A Not observed

LEPC	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	Not observed <input checked="" type="checkbox"/>
Neighbors	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	Not observed <input type="checkbox"/>
Response Contractor	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	Not observed <input type="checkbox"/>
Hospital	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	Not observed <input type="checkbox"/>
Other (BRA)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	Not observed <input type="checkbox"/>

Comment:

The Neighbors were to be contacted by the County Sheriff, as per, environmental coordinator (Gary Spicer). For items checked "Not observed", the evaluators could not determine whether or not these notifications occurred.

Who conducted the notifications? (Gary Spicer)

Facility personnel: Corporate personnel Contractor Other Not observed

Time notifications initiated: 10:49 am Time notifications completed: 12:59 am

Comment:

Staff Mobilization

Location of command post: Facility conference room in Service Building

Company staff response to complete containment:

< 1 hour 1-2 hours 2-3 hours > 3 hours N/A N/A-conducted by contractor

Comment:

Based on observations of the evaluators, it appeared during the initial staff mobilization, the AQI delegated significant command and control functions to off-site company personnel. The perception by the evaluators was the AQI relinquished too much of his assigned responsibility. It is recommended, the initial AQI/QI response activities should include immediate activation of the OSRO and/or company response personnel. The AQI/QI should not delegate activating response personnel and OSRO, per command and control requirements under the NIMS (40 CFR, part 300).

Company staff response to complete recovery:

< 1 hour 1-2 hours 2-3 hours > 3 hours N/A N/A-conducted by contractor

Comment:

Contractor mobilization for containment:

< 1 hour 1-2 hours 2-3 hours > 3 hours N/A N/A-conducted by contractor

Comment:

Eagle Environmental was initially called at 11:50 AM with a busy signal. Facility personnel got through at 11:55 and talked to Vernon Smith. The TXU environmental coordinator explained the parameters of the drill and ordered a response trailer with containment boom to be deployed.

Eagle Environmental arrive on site at 2:15 pm and deployed boom.

Note: The facility has permanent boom deployed at the outfall discharge canal, which meets the objective of a one hour response time per regulation.

Contractor mobilization for recovery:

< 1 hour 1-2 hours 2-3 hours > 3 hours N/A N/A-conducted by contractor

Comment:

Was Incident Command System (ICS) utilized? Yes No N/A Not observed

Planning Operations Logistics Finance Public affairs Safety Legal affairs

Comment:

Other ICS components may have been utilized, but were not observed by the evaluators.

Company personnel involved in response:

1-5 5-10 10-20 >20

Arrival time: 11:00 am

Response operations time: 11:40 am

Response (drill) completion time: 2:40 PM

Comment:

The AQI arrive within 10 minutes of notification of the spill. The QI arrived within one hour and forty five minutes of notification. Environmental personnel were engaged in the drill within 30 minutes of notification.

Contractor personnel involved in response:

1-5 5-10 10-20 >20

Arrival time: 2:00 PM

Response operations time: 2:10 PM

Incident Assessment

Monitoring for initial discharge assessment: Yes No N/A Not observed

Type of monitoring: Air Water Other Describe: _____

Comment:

Company did not have a written policy or equipment, that could be identified, for purpose of media (air, water, etc.) monitoring for safety of response personnel and/or permissible release/disposal parameters for this drill. Facility environmental personnel stated they could conduct sampling. It is recommended the facility develop a spill sampling plan.

Was the risk to the environment, business, public service, etc. determined during initial assessment? Yes No N/A Not observed

Comment:

Did the assessment team report data observed in the field? Yes No N/A Not observed

Comment:

This was conducted during the initial report.

Did the incident command identify resources needed to respond to the incident? Yes No N/A Not observed

Comment:

IC identified the need for 200 vacuum trucks (capacity/recovery capability) and was determined that 20 trucks would fulfill this requirement (on a rotational basis).

Were equipment resources adequate to respond to the incident? Yes No N/A Not observed

Comment:

Although the objective of the boom deployment was accomplished, had this been a live incident, the failure of some equipment to arrive on scene (response boat) could have created unnecessary difficulties and increase the probability of environmental damage.

Discharge Operations

Was the release source controlled? Yes No N/A Not observed

Equipment used to control the release:

Hard Boom Sorbent Boom Sorbent pads Manhole cover Dirt dike Sand bags

Comment:

Was the release source controlled? Land Water Both Yes No N/A Not observed

Comment (Including how release was contained):

Was recovery equipment available? Vac truck Skimmers Other

Comment:

Did the facility develop a plan for the threat of further discharge? Yes No N/A Not observed

Comment:

Was storage available for recovered product? Yes No N/A Not observed

Comment:

Were response actions performed skillfully? Yes No N/A Not observed

Comment:

Did responders adhere to safety practices? Yes No N/A Not observed

Comment:

Containment

Was necessary equipment for spill containment available? Yes No N/A Not observed

Comment:

Was the containment equipment in good working order? Yes No N/A Not observed

Comment:

Were diversions use to funnel oil to areas where containment measures were activated? Yes No N/A Not observed

Comment:

Did the facility pass the exercise? Yes No

Comment:
