

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.

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: