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January 4, 2016

Ms. Dianne M. Black
Assistant Director
Planning and Development
County of Santa Barbara
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Emergency Permit Application for Emergency Trucking Activity to De-Inventory LFC
Crude Storage Tanks - ExxonMobil Santa Ynez Unit Las Flores Canyon Facility

Dear Ms. Black:

InterAct PMTI (InterAct or "Agent"), on behalf of ExxonMobil Production Company, a division of Exxon Mobil Corporation (ExxonMobil or "Applicant"), is hereby submitting an emergency permit application and required attachments for your consideration and approval of an Emergency Permit for temporary trucking activity to de-inventory the processed crude oil (product) in the Crude Storage Tanks (about 425,000 barrels) from the Santa Ynez Unit (SYU) facility located in Las Flores Canyon (LFC).

The proposed activity would consist of the following:

- Install minimal facility modifications within LFC to include extension of existing piping to allow loading of up to two trucks at a time at an existing disturbed portion of the LFC Transportation Terminal (TT); in addition, two Lease Automatic Custody Transfer (LACT) units may be installed at the TT for royalty determination purposes, if required by Bureau of Safety and Environmental Enforcement (BSEE);
- Utilization of crude tanker trucks (trucks) to de-inventory product currently stored in the Crude Storage Tank A and Tank B in LFC (~425,000 barrels) over a 3-6 month period;
- Limit transportation to no more than thirty trucks per day of product from LFC to either of two offsite locations, one in Santa Barbara County and one in Kern County. These facilities are currently permitted to handle this type of truck unloading and have the equipment and capacity to accommodate the expected number of trucks for the proposed activity.

This temporary trucking activity is necessary as a result of the recent shut-down of the Plains All American Pipeline Line 901.

Exxon is requesting the approval of an Emergency Permit as detailed in the attached application and supporting documents. All known environmental impacts related to transport and air emissions will be mitigated to the maximum extent feasible throughout this temporary activity. This is a one-time request. Once the tanks at LFC are de-inventoried of the currently stored product, the emergency trucking activity would cease and the installed piping and components would either be removed or taken out of service.

The application consists of the following attachments:

Attachment A – General Application Materials

- A.1 Emergency Permit Application
- A.2 Agreement for Payment of Processing Fees
- A.3 Description of Activity
- A.4 Justification of Emergency

Attachment B – Mapping, Engineering, & Technical Documentation

- B.1 Vicinity Map
- B.2 Parcel Maps
- B.3 Site Plan
- B.4 Site Photographs
- B.5 Trucking Route Maps
 - Overview of the Routes
 - P66 Santa Maria Pump Station Route Detail
 - PAAPL Pentland Pump Station Route Detail
 - LFC Highway On- and Off-ramp Detail – Main Route (Refugio Rd.)
 - LFC Highway On- and Off-ramp Detail – Alternative Route (El Capitan State Beach Rd.)
- B.6 Truck Unloading Facilities Information

Attachment C – Environmental Documentation

- C.1 Air Quality Analysis

- C.2 Trucking Quantitative Risk Analysis (QRA)
- C.3 LFC Loading Risk Analysis
- C.4 Crude Oil Transportation Risk Management & Prevention Program

Please note that ExxonMobil has been in communication with the Santa Barbara County Air Pollution Control District (APCD) and prepared the necessary permit submittals for the additional emissions associated with the proposed activity.

ExxonMobil appreciates your time and effort to promptly review this important request. We are available to discuss any comments you may have. If you have any questions, please contact me or Mr. Bill Grady at 970-356-3856 or bgrady@algcorp.com.

Sincerely,



Michelle Pasini
President/Principal Consultant
805-766-7484
Michelle.Pasini@interactprojects.com

Enclosures

CC Bill Grady, ALG
Steve Maples, ExxonMobil
David Motes, ExxonMobil

**ATTACHMENT A.1
EMERGENCY PERMIT APPLICATION**



EMERGENCY

EMERGENCY (EMP) - When an emergency action is warranted the requirements for obtaining permits normally required may be temporarily deferred. You must apply for the appropriate permit within 90 days of the granting of the Emergency Permit. An emergency is defined in the Zoning Ordinance as "a sudden unexpected occurrence demanding immediate action to prevent or mitigate loss or damage to life, health, property, or essential public services".

THIS PACKAGE CONTAINS

- ✓ APPLICATION FORM
- ✓ SUBMITTAL REQUIREMENTS

AND, IF ✓'D, ALSO CONTAINS

- AGREEMENT FOR PAYMENT OF PROCESSING FEES**
[Click to download Agreement to Pay form](#)
- HAZARDOUS WASTE & MATERIALS SUPPLEMENT**
[Click to download Hazardous Waste & Materials Supplement form](#)
- PLAN AND MAP REQUIREMENTS**
[Click to download Site Plan and Topographical Map Requirements](#)
- FIRE DEPARTMENT VEGETATION PLAN INFORMATION**
[For additional information regarding Fire Department Requirements click here](#)
- STORMWATER CONTROL PLAN**
[For project applicability and SCP submittal requirements, click here](#)

South County Office
123 E. Anapamu Street
Santa Barbara, CA 93101
Phone: (805) 568-2000
Fax: (805) 568-2030

Energy Division
123 E. Anapamu Street
Santa Barbara, CA 93101
Phone: (805) 568-2000
Fax: (805) 568-2030

North County Office
624 W. Foster Road, Suite C
Santa Maria, CA 93455
Phone: (805) 934-6250
Fax: (805) 934-6258

Website: www.sbcountyplanning.org

SUBMITTAL REQUIREMENTS FOR EMERGENCY APPLICATION

Military Land Use Compatibility Planning Requirements

Is the site located in an area with any military uses/issues? Yes No

Please review the website to determine applicability.

<http://cmluca.projects.atlas.ca.gov/>. This requirement applies to all General Plan Actions and Amendments, and Development Projects that meet one or more of the following conditions:

- 1) Is located within 1,000 feet of a military installation,
- 2) Is located within special use airspace, or
- 3) Is located beneath a low-level flight path

Copy of report attached? Yes No **Not Applicable**

 X 3 copies of completed application form and any applicable supplements

 X 1 set of photos

 X 2 copies of a site plan drawn to scale and **Folded To 8½ X 11"**

[Click to download Site Plan and Topographical Map Requirements](#)

 X 1 copy of the site plan reduced to 8½ x 11

 Check payable to Planning & Development (prior agreement exists)

 X Agreement to Pay Form

[Click to download Agreement to Pay form](#)



PLANNING & DEVELOPMENT
PERMIT APPLICATION

SITE ADDRESS: 12000 Calle Real, Goleta CA

ASSESSOR PARCEL NUMBER: 081-220-014

PARCEL SIZE (acres/sq. ft.): Gross ~550 acres Net ~550 acres

COMPREHENSIVE/COASTAL PLAN DESIGNATION: A-II-100 ZONING: M-CR

Are there previous permits/applications? no yes numbers: 87-DP-32cz
(include permit# & lot # if tract)

Did you have a pre-application? no yes if yes, who was the planner? _____

Are there previous environmental (CEQA) documents? no yes numbers: On file

1. **Financially Responsible Person** Exxon Mobil Corporation Phone: 805-961-4002 FAX: _____
(For this project)
Mailing Address: P.O. Box 30151 College Station TX 77842
Street City State Zip
2. **Owner:** Same as FRP Phone: _____ FAX: _____
Mailing Address: _____ E-mail: _____
Street City State Zip
3. **Agent:** Michelle Pasini Phone: 805-658-5600 FAX: 805-658-5605
Mailing Address: 4567 Telephone Rd, Ste 203, Ventura CA, 93003 E-mail: michelle.pasini@interactprojects.com
Street City State Zip
4. **Arch./Designer:** _____ Phone: _____ FAX: _____
Mailing Address: _____ State/Reg Lic# _____
Street City State Zip
5. **Engineer/Surveyor:** _____ Phone: _____ FAX: _____
Mailing Address: _____ State/Reg Lic# _____
Street City State Zip
6. **Contractor:** _____ Phone: _____ FAX: _____
Mailing Address: _____ State/Reg Lic# _____
Street City State Zip
7. **Soils Lab:** _____ Phone: _____ Reg. _____
Mailing Address: _____ State/Reg Lic# _____
Street City State Zip

PARCEL INFORMATION: (Check each that apply. Fill in all blanks or indicate "N/A")

1. **Existing Use:** Agric Residential Retail Office Indus Vacant Other
 2. **Proposed Use:** Agric Residential Retail Office Indus Other
 3. **Existing:** # of Buildings N/A Gross Sq. Ft.: N/A # Res. Units: 0 Age of Oldest Struct.: N/A
 4. **Proposed:** Project: _____ Gross Sq. Ft.: N/A # Res. Units: 0
 5. **Grading (cu. yd.):** Cut <50 Fill <50 Import <50 Export <50 Total: <50
- Total area disturbed by grading (sq. ft. or acres): 0.57 acres

COUNTY USE ONLY

Case Number: _____ Companion Case Number: _____
Supervisorial District: _____ Submittal Date: _____
Applicable Zoning Ordinance: _____ Receipt Number: _____
Project Planner: _____ Accepted for Processing _____
Zoning Designation: _____ Comp. Plan Designation _____

For all questions below, attach additional sheets if necessary, referencing the section and question number. Please fill in every blank. Use "N/A" where question is not applicable.

II.A. DESCRIBE THE PROJECT: Please use the space below or type on a separate sheet and attach to the front of your application a complete description of your request including the permit/decision requested, location, setting, and purpose of the project.

Please refer to Attached A.3 Description.

II.B. DESCRIBE THE NATURE OF THE EMERGENCY:

Please refer to Attachments A.3 Description and A.4 Justification of Emergency

The emergency (circle one): occurred or is imminent

Describe: Please refer to Attachment A.4 Justification of Emergency

III. GRADING: Will there be any grading associated with the project? N Minor grading

(NOTE: For proposed access drives over 12% grade, a clearance letter from the Fire Dept. will be required)

CUT <50 cubic yards AMOUNT TO BE EXPORTED <50 c.y.

FILL <50 c.y. AMOUNT TO BE IMPORTED <50 c.y.

MAXIMUM VERTICAL HEIGHT OF CUT SLOPES N/A

MAXIMUM VERTICAL HEIGHT OF FILL SLOPES N/A

MAXIMUM HEIGHT OF ANY PROPOSED RETAINING WALL(S) N/A

TOTAL AREA DISTURBED BY GRADING (sq. ft. or acres) 0.57 acres of existing, disturbed area

What is the address of the pick-up/deposit site for any excess cut/fill? N/A

Specify the proposed truck haul route to/from this location.

N/A

IV. SITE INFORMATION

A. Is this property under an Agricultural Preserve Contract? Y **N**

B. Describe any unstable soil areas on the site.

There are no known unstable soils at the site.

C. Name and describe any year round or seasonal creeks, ponds, drainage courses or other water bodies. How is runoff currently conveyed from the site?

Two perennial waterways flow through the site, Las Flores Canyon Creek and Corral Creek.

Typical site runoff naturally sheet flows into existing waterways. Facilities are contained to prevent run off and surface drains are utilized to release excess rainwater.

D. Has there ever been flooding on the site? Y **N**

If yes, state the year and describe the effect on the project site.

E. Describe any proposed drainage and/or flood control measures. How will storm water be conveyed across and from the site? Where will storm water discharge?

Currently, uncontaminated storm water, which does not contact processing and storage areas may be discharged into Corral Creek. No changes to current drainage are proposed.

F. Will the project require the removal of any trees? Y **N**

If so, please list them here as requested. Attach additional sheets as necessary.

<u>Type</u>	<u>Diameter (at 4' height)</u>	<u>Height</u>
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Explain why it is necessary to remove these trees.

N/A

G. Describe any noise sources that currently affect the site.

Noise from existing operations at Las Flores Canyon and POPCO, noise from traffic on Highway 101.

H. Are there any prehistoric or historic archaeological sites on the property or on neighboring parcels?

Y N **Unknown**

If yes, describe. **Not applicable, no new site disturbance is proposed.**

I. Describe all third party property interests (such as easements, leases, licenses, rights-of-way, fee ownerships or water sharing agreements) affecting the project site, provision of public utilities to the site or drainage off the site.

N/A

- J. Have you incorporated any measures into your project to mitigate or reduce potential environmental impacts? N Unknown If so, list them here. (Examples include tree preservation plans, creek restoration plans, and open space easements.)

Yes, refer to Attachment A.3 Description

V. STORM WATER MANAGEMENT AND APPLICATION OF LOW IMPACT DEVELOPMENT FEATURES

Is the project located in the NPDES Permit Area¹? Y Undetermined

If Yes and 2,500 square feet or more of new or replaced impervious area, the project shall comply with the following:

Tier 1. If the project is 2,500 square feet or more of new or replaced impervious area, submit a *Stormwater Control Plan for Small (Tier 1) Projects*¹ with this application that identifies Low Impact Development measures incorporated into the project design, such as:

- Limit disturbance of natural drainage features
- Limit clearing, grading, and soil compaction
- Minimize impervious surfaces
- Minimize runoff by dispersing runoff to landscape or using permeable pavements

Tier 2. If the project is 5,000 square feet or more of new or replaced “net impervious” area (not Single Family Dwelling), or if the project is Single Family Dwelling with 15,000 square feet or more of new or replaced “net impervious” area, submit a *Stormwater Control Plan* with this application that identifies 1) Low Impact Development measures incorporated into the project design and 2) stormwater quality treatment measures. [“Net impervious” is defined as the sum of new and replaced impervious surface area minus any reduction in impervious, such as new landscaped area. It is an incentive for redevelopment projects to increase pervious area.]

Tier 3. If the project is 15,000 square feet or more of new or replaced impervious area, submit a *Stormwater Control Plan* with this application that identifies the above requirements and also identifies retention of stormwater runoff from a regulated storm event.

If No, the project is not located in the NPDES Permit Area, but is a Regulated Project, the project shall comply with the following:

Regulated Project:

1. Residential subdivision developments with 10 or more dwelling units;
2. Commercial development of 0.5 acres or greater;
3. Parking lots of 5,000 square feet or more or have 25 or more parking spaces and are potentially exposed to storm water runoff;
4. Automotive repair shops;
5. Retail gasoline outlets;
6. Restaurants, and
7. Any new development or redevelopment where imperviousness exceeds one acre.

¹ See www.sbprojectcleanwater.org under “Development” for map of the NPDES Permit Area, Stormwater Technical Guide, Stormwater Control Plan template, Stormwater Control Plan for Small (Tier 1) Projects, and a definition of Low Impact Development.

Water Quality: Submit a *Stormwater Control Plan* with this application that identifies measures to reduce and remove pollutants from storm water runoff. The *Stormwater Control Plan* will follow the Tier 2 approach described in the Stormwater Technical Guide, with storm water treatment, source control, and LID² measures.

VI. ACCESS

A. Describe the existing access road(s) to the site. Include road widths, shoulders, and type of surface material.

Access to the Site is from Highway 101 to Calle Real and onto a private road. The private road is approximately 20-30 feet wide and the surface is paved.

B. Does property front on a public street? Y N
Is access to be taken from this public street? Y N
Name of public street: **Calle Real**

C. Will the proposed access utilize an easement across neighboring property? Y* N
***Submit documentation which supports the applicant's use of this easement.**

D. Describe proposed construction equipment access **Same as described in Section VI. A.**

VII.DEVELOPMENT AND USE

A. Existing: Describe the existing structures and/or improvements on the site.

<u>Use</u>	<u>Size (sq ft)</u>	<u>Height</u>	<u># of Dwelling Units</u>
<u>Refer to FDP</u>	_____	_____	_____
_____	_____	_____	_____

B. Proposed: Describe the proposed structures and/or improvements.

<u>Use</u>	<u>Size (sq ft)</u>	<u>Height</u>	<u># of Dwelling Units</u>
<u>Refer to Attachment A.3</u>	_____	_____	_____
_____	_____	_____	_____

C. Will any structures be demolished or removed? No If so, please list them here as requested.

<u>Current Use</u>	<u>Historic Use</u>	<u>Age</u>	<u>Rental Price (if rented)</u>
_____	_____	_____	_____

D. Describe all other existing uses of the property.
Pacific Offshore Pipeline Company is a natural gas treatment facility owned and operated by Exxon Mobil, adjacent to the Las Flores Canyon Facility.

E. How will the project affect the existing uses of the property?
Please refer to Attachment A.3 Description.

² Low Impact Development is a design approach that minimizes or eliminates pollutants in storm water through natural processes and maintains pre-development hydrologic characteristics, such as flow patterns, onsite retention, and recharge rates. For examples and design guidance see <http://www.sbprojectcleanwater.org>.
updated by FTC 081814

F. Describe any other historic use(s) of the property. This may include agricultural (include crop type), commercial, or residential uses.

Construction of the Las Flores Canyon Facility began in 1988. Prior to construction of the facility, the property was used for onshore oil extraction as early as 1929, also refer to Attachment A.3 Description.

G. Provide a short description of the land uses surrounding the site.

North **Open space, Los Padres National Forest**

South **Highway 101, El Capitan State Beach, Pacific Ocean**

East **Open space, El Capitan Canyon Campground**

West **Open space, residential, agriculture**

H. STATISTICS: Mark each section with either the information requested or "n/a" if not applicable.

	<u>EXISTING</u>	<u>PROPOSED</u>	<u>TOTAL</u>
BUILDING COVERAGE	<u>No Change</u>	_____	_____
IMPERMEABLE ROADS/PARKING/ WALKWAYS (sq. ft.)	<u>No Change</u>	_____	_____
OPEN SPACE (sq. ft.)	<u>No Change</u>	_____	_____
RECREATION (sq. ft.)	<u>No Change</u>	_____	_____
LANDSCAPING (sq. ft.)	<u>No Change</u>	_____	_____
AGRICULTURAL LANDS (sq. ft.)	<u>No Change</u>	_____	_____
POPULATION (#) (employees/residents)	<u>No Change</u>	_____	_____
DWELLING, HOTEL/MOTEL UNITS	<u>No Change</u>	_____	_____
PARKING (on-site)			
TOTAL # OF SPACES	<u>No Change</u>	_____	_____
# OF COVERED SPACES	<u>No Change</u>	_____	_____
# OF STANDARD SPACES	<u>No Change</u>	_____	_____
SIZE OF COMPACT SPACES	<u>No Change</u>	_____	_____

Estimate the cost of development, excluding land costs. **\$200,000**

VIII. PARCEL VALIDITY

P&D requires applications for development on vacant, unimproved property to provide clear evidence that the property is a separate legal lot. The following documents that show the subject property in its current configuration constitute acceptable evidence of a separate, legal lot: a recorded Parcel or Final Map, a recorded Official Map, a recorded Certificate of Compliance or Conditional Certificate of Compliance, an approved Lot Line Adjustment, a recorded Reversion to Acreage, a recorded Voluntary Merger or an approved Lot Split Plat.

A. Type of evidence provided to demonstrate a separate, legal lot:

Assessor's Parcel Map

Copy of evidence attached: Yes No

Reference number for evidence supplied: Attachment B.2

IX. PUBLIC/PRIVATE SERVICES

A. WATER:

1. If the property is currently served by a private well, submit the following for each well:

- a. Pumpage records (electrical meter or flow meter readings) for the past 10 years
- b. Pump test data
- c. Location of other wells within 500 feet
- d. Water quality analysis
- e. Drillers report (with construction details)
- f. Copy of applicable well sharing agreement

2. Does the well serve other properties? Y N/A

If yes, address(es): _____

3. Is a well proposed? Y If so, will it serve other properties? Y N

If yes, address(es): _____

4. If the property is currently served by a private or public water district, submit the following:

a. Name: _____

5. Will the project require annexation to a public or private water company? Y

If yes, name: _____

B. SEWAGE DISPOSAL:

1. Existing: Indicate if the property is currently served by the following:

Yes/No

a. Septic system* No

b. Drywell* No

c. Public sewer district No If yes, name: _____

*Submit engineering details on septic tanks and dry wells, as well as calculations for leach field size, where applicable.

2. Proposed: Indicate what sewage disposal services are proposed as part of this project?

- a. Septic system* No
- b. Drywell* No
- c. Public sewer district No

District Name: _____

*Submit percolation tests and/or drywell performance tests as applicable.

3. Will the project require annexation to any public sewer district? Y N

Name: _____

C. FIRE PROTECTION

1. Fire protection is (will be) provided by the **Santa Barbara County** Fire Department.
(Montecito, Summerland, S.B. County)

2. Is there an existing water main infrastructure in the vicinity? Circle one: Yes No

3. How far away is the nearest standard fire hydrant? **25 feet**

4. Is a new fire hydrant proposed? Circle one: Yes **Convert 1 hydrant to a fire monitor**

5. If a new hydrant is proposed, what is the longest driving distance from the proposed hydrant to the proposed building(s)? **40 feet to the furthest Truck Loading station.**

6. Will fire protection be provided by an on-site water storage tank? Circle one: Yes No

Tank capacity: **1,344,000** gallons

7. What is the driving distance from the water tank to the proposed structure(s)? **2000 feet.**

8. Is a fire sprinkler system proposed? Yes No Location _____

9. Describe the access for fire trucks. Include width and height clearance for access and surface material.

Access to the Site is via Calle Real to a private road. The private road is approx. 20-30 feet wide and the surface is paved. There are no height restrictions along the access road.

10. Will hazardous materials be stored or used? Y N List any hazardous materials which may be used or stored on the site.

No change to existing hazardous materials on site is proposed as part of this activity.

HAZARDOUS WASTE/MATERIALS

Please read and answer the following questions if, in the known history of the property, there has been any storage (above or underground) or discharge of hazardous materials or if the proposal includes storage, use or discharge of any hazardous material. Hazardous materials include pesticides, herbicides, solvents, oil, fuel, or other flammable liquids. Attach additional sheets if necessary.

Past & Present:

List any hazardous materials which have been or are currently stored/discharged/produced on the property. Describe their use, storage and method of discharge. Provide dates where possible.

Chemicals consistent with typical oilfield use may have been used historically on site. The proposed activity will not alter the use of chemicals onsite.

If a characterization study has been prepared, please submit it with this application.

Is the project site on the County Site Mitigation list? Y Unknown

Is the site on the CA Hazardous Waste and Substances Sites list? Y Unknown

Proposed Project:

List any hazardous materials proposed to be stored/discharged/produced on the property. Describe the proposed use and method of storage and disposal.

No change to existing hazardous material usage is proposed as part of this activity.

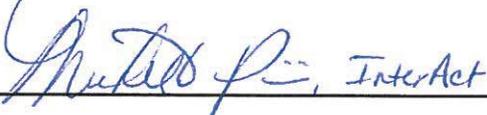
If the proposed project involves use, storage or disposal of any hazardous materials, please contact County Fire Department at 686-8170 to determine whether additional submittals are required.

Please include any other information you feel is relevant to this application .

CERTIFICATION OF ACCURACY AND COMPLETENESS: Signatures must be completed for each line. If one or more of the parties are the same, please re-sign the applicable line.

Applicant's signature authorizes County staff to enter the property described above for the purposes of inspection.

I hereby declare under penalty of perjury that the information contained in this application and all attached materials are correct, true and complete. I acknowledge and agree that the County of Santa Barbara is relying on the accuracy of this information and my representations in order to process this application and that any permits issued by the County may be rescinded if it is determined that the information and materials submitted are not true and correct. I further acknowledge that I may be liable for any costs associated with rescission of such permits.

Michelle Pasini (Agent)		<u>1/4/16</u>
Print name and sign - Applicant/Agent	InterAct	Date
Kartik Garg		<u>1/4/2016</u>
Print name and sign - Landowner		Date

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ATTACHMENT A.2
AGREEMENT FOR PAYMENT OF PROCESSING FEES



ENERGY AND MINERALS DIVISION AGREEMENT FOR PAYMENT of PERMIT PROCESSING and COMPLIANCE FEES and CONSULTANT COSTS

The County of Santa Barbara (hereinafter COUNTY) and ExxonMobil Production Company, the Financially Responsible Party (hereinafter FRP)

AGREE AS FOLLOWS:

1. FRP has submitted to COUNTY an application for the Emergency Permit - Trucking Activity to De-Inventory LFC Crude Storage Tanks Case # _____ (hereinafter PROJECT)
2. The parties desire by this Agreement to provide for the payment of the reasonable costs of processing FRP's application for the project so as to ensure the continued, uninterrupted and efficient processing of said application.

FRP understands and agrees that Government Code §65104 authorizes COUNTY to charge and collect all processing fees, including consultant costs, as part of the application fee charged for the PROJECT and that a signed agreement for payment of all processing fees and consultant costs and an initial deposit submitted to COUNTY is a condition precedent to a determination of application completeness under Government Code §65943 and to continued, uninterrupted processing of the PROJECT.

3. FRP understands and agrees that once an application is determined to be complete, COUNTY has a mandatory duty under Government Code §65950 to exercise its discretion to approve, conditionally approve, or deny the PROJECT within statutory time limits, and that it is impracticable for COUNTY staff to complete processing or present sufficient information to the Planning Commission and/or Board of Supervisors to enable the Planning Commission and/or Board of Supervisors to make legally required findings for PROJECT approval, unless costs are paid in full prior to decision.
4. FRP and COUNTY agree that, because of the size, nature, or scope of the PROJECT, it is impossible to ascertain the full extent of the costs involved in processing the application and preparing the necessary environmental documentation upon initiation of case processing. FRP and COUNTY further agree that it is in the interest of the parties and the intent of this Agreement to: (a) permit payment of a deposit of a portion of the estimated case processing fees prior to a determination of application completeness; (b) permit subsequent periodic billings and payments necessary to keep a positive balance on account; and, (c) permit

subsequent deposits as necessary to fund consultant costs. FRP agrees it will be benefited by retaining greater cash liquidity and will make additional payments upon notification by the COUNTY when they are necessary. COUNTY agrees it will be benefited through the greater certainty of recovering its full costs to process FRP's application. COUNTY further agrees that all fees charged to FRP under this Agreement shall comply with Government Code §65104.

5. Therefore, FRP agrees that, in consideration of COUNTY's waiver of its right to collect full fees prior to a determination of application completeness, FRP shall pay an initial case processing deposit consistent with the effective fee schedule, and if, in the judgment of COUNTY staff, costs related to the PROJECT may exceed the initial deposit, FRP shall make periodic payments to COUNTY to reimburse COUNTY for the processing of the application noted above, including appeal costs which exceed the initial appeal fee. In the event FRP's project is approved, FRP understands and agrees that it shall pay all fees and costs due to the COUNTY for permit compliance pursuant to Board Resolution No. 93-430 and applicable permit conditions imposed by the COUNTY. Such periodic payments shall be made within 30 days of the billing date. FRP further agrees that failure to pay such accrued costs shall be grounds for suspension of processing. FRP further understands that such delays could result in a recommendation for denial of the PROJECT in the event that the processing was not complete prior to the time required for a COUNTY decision pursuant to the Permit Streamlining Act (Government Code §65950 et seq.). In the event construction or operation of the PROJECT has begun, such non- or delayed payment may be grounds for permit non-compliance or violation.
6. FRP agrees that "consultant costs" includes those necessary to satisfy COUNTY's duty to meet the requirements of the California Environmental Quality Act (CEQA) and the COUNTY CEQA Guidelines resulting in preparation of environmental documents such as Environmental Impact Reports, joint Environmental Impact Reports/Statements, and Negative Declarations. In the event the PROJECT is approved, FRP further agrees that "consultant costs" also includes the reasonable cost of any necessary special studies or programs pursuant to PROJECT permit conditions, including any condition requiring participation in COUNTY's permit compliance program, to assess FRP's compliance with its permit conditions during both construction and operation where necessary. COUNTY shall retain and contract necessary services of environmental and technical consultants (hereinafter CONSULTANT), after consultation with FRP, consistent with COUNTY's normal contracting procedures. FRP further agrees that it shall deposit with COUNTY 100% of CONSULTANT's Base Contract amount plus any funds required for contingency. COUNTY shall use these funds to meet the projected cost for completion of tasks as contracted with CONSULTANT. FRP agrees that the adequacy and the extent of payment to CONSULTANT for its work shall be determined by COUNTY after consultation with FRP. FRP agrees that all decisions concerning the preparation of contractual documents lies with the COUNTY through its designated representatives.
7. FRP agrees that that it shall provide, prior to COUNTY's contracting with CONSULTANT for services, deposits identified in paragraph 6 above not later that twenty-one (21) calendar days after receipt of written notice from COUNTY. FRP agrees that its decision not to provide such deposits, or to delay providing such deposits, shall be grounds for suspension of processing and/or denial of the PROJECT pursuant to CEQA Guidelines §15109. In the event construction or operation of the PROJECT has begun, such non- or delayed payment

may be deemed to be a permit non-compliance or violation. Within thirty (30) days of completion or termination of CONSULTANT contract, COUNTY agrees that all FRP deposits of \$50,000 or more shall be placed in an interest-bearing account, with interest paid to FRP consistent with COUNTY practices and policies.

8. The parties to this Agreement recognize that during the preparation of environmental documents or during completion of special studies and/or compliance efforts, it may become necessary to execute change order provisions in COUNTY's contract(s) with CONSULTANT(s). If, in the reasonable judgment of COUNTY, changes in the scope of work require more funds than already deposited, FRP agrees to deposit these funds with COUNTY not later than twenty-one (21) days after receipt of written notice from COUNTY. The need for a change order in COUNTY's contract with CONSULTANT shall be determined by COUNTY after consultation with FRP.
9. COUNTY shall maintain true, correct and complete sets of records in connection with case processing costs, contracted work, and all transactions related thereto, for a period of not less than three (3) years after completion of case processing work or termination of the contract(s). FRP may audit COUNTY's records for case processing fees and charges for a period not to exceed the three (3) year period identified above. FRP shall provide a written request prior to conducting such review or audit, and shall have the right to conduct no more than one audit per year without written consent by COUNTY. Any audit and review conducted pursuant to this paragraph will be conducted by FRP's auditors at FRP's expense, or at COUNTY's option and expense, by a mutually acceptable third-party accounting firm. If a contract for CONSULTANT's work is executed, COUNTY shall require that CONSULTANT maintain its records and make such records available for audit in compliance with this paragraph.
10. FRP shall have the right to review monthly or periodic case processing and CONSULTANT costs as billed to FRP. If, in the opinion of FRP, there are expenditures being made outside the scope of case processing tasks or CONSULTANT contract(s), FRP shall reimburse COUNTY for the expenses in question but may request in writing that COUNTY evaluate the issues involved as identified by FRP. COUNTY shall conduct such evaluations within a reasonable time and, if necessary, halt any work outside the scope of case processing tasks or CONSULTANT contract(s). The Director of Planning and Development shall review the matter should COUNTY staff and FRP not reach an agreement. FRP agrees that nothing herein shall be construed as relieving FRP of its responsibility to reimburse COUNTY pursuant to this Agreement.
11. Within four (4) months of termination of this Agreement, any funds not expended shall be refunded to FRP. FRP agrees that COUNTY may withhold any and all permits not issued until all case processing or related fees are paid by FRP.

Executed this _____ day of _____, 20__.

COUNTY OF SANTA BARBARA
Planning and Development Department
Energy Division

FINANCIALLY RESPONSIBLE PARTY

By: _____
P & D Representative

Print Name: KARTIK GARG

Signature: 

Date: 4 JAN 2016

Mailing Address: C/O EXXONMOBIL
12000 CALLE REAL
GOLETA CA 93117

CHANGE OF FINANCIALLY RESPONSIBLE PARTY

If this document supersedes a previous Agreement to Pay, due to change in financial responsibility, the previous FRP must also sign to acknowledge release of responsibilities.

PREVIOUS FINANCIALLY RESPONSIBLE PARTY:

FRP Name: _____

FRP Representative Name: _____

Signature: _____

Date of Release of Financial Responsibility: _____

ATTACHMENT A.3
DESCRIPTION OF ACTIVITY

EXXONMOBIL – SANTA YNEZ UNIT
EMERGENCY TRUCKING ACTIVITIES TO DE-INVENTORY
LFC CRUDE STORAGE TANKS
DESCRIPTION OF ACTIVITY

TABLE OF CONTENTS

1. INTRODUCTION..... 2
2. LOCATION..... 2
3. ACCESS, TRAFFIC, AND PARKING 2
4. BACKGROUND AND HISTORIC OPERATIONS 3
5. PROPOSED FACILITIES..... 3
6. PROPOSED TRUCK TRANSPORTATION ACTIVITIES..... 4
7. OTHER PERMITS AND APPROVALS..... 4
8. ENVIRONMENTAL PROTECTION AND PUBLIC SAFETY 5

EXHIBITS

Exhibits 1a and 1b LFC Truck Loading Area and Proposed Loading Piping Connections
Exhibit 2 LFC Truck Loading Schematic
Exhibit 3 Truck Routing Within LFC TT

1. INTRODUCTION

ExxonMobil Production Company, division of Exxon Mobil Corporation (ExxonMobil or “Applicant”) requests approval of an Emergency Permit for temporary trucking activities to de-inventory the processed crude oil or product in the Crude Storage Tanks from the Santa Ynez Unit (SYU) facility located in Las Flores Canyon (LFC) approximately twelve (12) miles west of Goleta. Area Overview map is provided in Attachment B.1.

The proposed activities would consist of the following activities:

- Utilize crude tanker trucks (trucks) to de-inventory product currently stored in the Crude Storage Tank A and Tank B in LFC (total of 425,000 barrels) over a 3-6 month period;
- Install minimal facility modifications to include extension of existing piping to allow loading of up to two trucks at an existing disturbed portion of the LFC Transportation Terminal (TT). In addition, two Lease Automatic Custody Transfer (LACT) units may be installed at the TT for royalty determination purposes, if required by Bureau of Safety and Environmental Enforcement (BSEE);
- Limit transportation to no more than thirty trucks per day of product from LFC to either of two offsite locations, one in Santa Barbara County and one in Kern County. These facilities are currently permitted to handle this type of truck unloading and have the facilities and capacity to accommodate the expected number of trucks for the proposed activity.

2. LOCATION

The crude storage tank de-inventory operations would occur on the ExxonMobil property located within LFC, which is approximately twelve (12) miles west of the City of Goleta and one (1) mile north of Highway 101. The LFC facility is located on APN 081-220-014, an approximately 550-acre parcel, commonly identified as 12000 Calle Real. The proposed truck loading components will be installed within an existing developed portion (approximately one half-acre in size) of the LFC TT. No new habitat or vegetation disturbance will be required. Reference Exhibit 1 for a diagram of the loading area and the proposed modifications.

3. ACCESS, TRAFFIC, AND PARKING

Regional access to the LFC is provided by El Capitan State Beach Road and Refugio Road which both have direct connections to Highway 101. Local access to the LFC Transportation Terminal (TT) area is provided by existing interior facility roads and an existing frontage road (Calle Real) which runs parallel to Highway 101 and extends between El Capitan State Beach Road and Refugio Road. No new public or private roads are required.

Truck destinations will include the existing truck unloading facilities provided in Table 1. These facilities contain existing permitted unloading and custody transfer facilities. These facilities normally handle this type of truck unloading and have the facilities and capacity to

accommodate the expected number of trucks for the proposed activity. Attachment B.6 provides information on each facility.

Table 1 – Truck Unloading Destinations

Destination Facility	Facility Address	Affected Roadways
Phillips 66 Santa Maria Pump Station (operated by Phillips 66 Pipeline Company)	1580 East Battles Road, Santa Maria, CA 93454	<ul style="list-style-type: none"> - LFC facility interior road - Corral Canyon Road - Calle Real Road - Refugio Road - Highway 101 - E. Betteravia Road (in Santa Maria) - Rosemary Rd. (in Santa Maria) - E. Battles Rd. (in Santa Maria) (private road where used by the project traffic)
Plains All American Pentland Pump Station (operated by Plains All American Pipeline L.P.)	2311 Basic School Road, Maricopa, CA 93252	<ul style="list-style-type: none"> - LFC facility interior road - Corral Canyon Road - Calle Real Road - Refugio Road - Highway 101 - Highway 166 (from Santa Maria to Maricopa area) - Basic School Road (in Maricopa)

No new parking is required as part of this operation. Approximately one-hundred and fifty (150) existing parking spaces are located at the LFC facility for employees and visitors. Additional temporary parking spaces could be identified throughout disturbed areas at the TT, if necessary but this operation will not generate a substantial new parking load. Trucks will be loaded with product and will immediately leave the site for transport to offsite locations.

4. BACKGROUND AND HISTORIC OPERATIONS

The truck loading site is located within the currently developed LFC and Pacific Offshore Pipeline Company (POPCO) onshore facilities. SYU includes three offshore platforms that ship emulsion, via pipeline, to the onshore facilities. LFC separates oil and produced water while POPCO and LFC separates and treats the natural gas. Under typical operating conditions, product is shipped to offsite locations via the Plains All American Pipeline (PAAPL) Line 901 and produced water is transported offshore for permitted disposal. Natural gas is either used onsite (cogeneration facility) or sold to SoCal Gas. The first platform (Hondo) was placed in operation in 1981 and the expanded SYU onshore and offshore facilities have been in operation since 1993.

5. PROPOSED FACILITIES

The proposed onsite facilities include the installation of piping connection to allow for the loading of two trucks (Reference Exhibit 1). In addition, two LACT units may be installed at the TT for

royalty determination purposes, if required by BSEE. The piping and LACT units would be located within a consolidated 0.57-acre (25,000 square feet) portion of the existing LFC Transportation Terminal area. As a result, no new habitat or vegetation removal is proposed and no significant grading or topographic alternation will be needed. Site grading will consist of only the minimum amount of soil work needed to construct pipe supports and possibly containment additions, if needed. Reference Exhibit 2 for a schematic diagram of the truck loading facilities at the LFC TT.

For sales and royalty purposes, the trucks will have custody transfer occur at the unloading facility using the facility's existing measurement systems or at the LFC using the installed LACT units. Additionally, the trucks will be weighed entering and leaving LFC at the existing truck weigh scales.

6. PROPOSED TRUCK TRANSPORTATION ACTIVITIES

The crude storage tank de-inventory includes the temporary transportation of product via trucks to one of the two designated facilities (Reference Table 1). Each truck can transport approximately 150 barrels. A maximum of two (2) trucks could be loaded during any hour. The maximum number of loaded trucks leaving LFC per day will be limited to no more than thirty (30). Truck loading and transportation would occur seven days a week and 24-hours per day, as defined in the CO-TRMPP (Reference Attachment C.4). After unloading at one of the two designated facilities, the trucks may return directly back to LFC to reload or may be reassigned to other operations. Trucking operations are expected to be completed within a 3-4 month period but could extend to six months depending on a number of operational issues. Reference Exhibit 3 for a picture of the LFC TT area showing the truck routing to and from the loading area.

7. OTHER PERMITS AND APPROVALS

ExxonMobil will obtain the required permits and approvals from other agencies with jurisdiction prior to initiating any loading operations at LFC. Specially, ExxonMobil will obtain a permit from the Santa Barbara County Air Pollution Control District to address the additional emissions associated with the loading activity at LFC. The issued Authority to Construct/Permit to Operate (ATC/PTO) will include the loading emissions, fugitive component emissions, and incremental Thermal Oxidizer emissions associated with the truck loading activity at LFC. The permit will include the emissions from a maximum of loading two trucks per hour and thirty trucks per day for a period of up to six months. Temporary emission reduction credits will be obtained, as required, to mitigate the emission increases. Additionally, due to production shut-in, total SYU emissions will remain well below approved permit levels.

In addition, ExxonMobil will obtain approval from the Bureau of Safety and Environmental Enforcement (BSEE) for transfer of the royalty points to the unloading facilities.

LFC plans including the Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP), Oil Spill Contingency Plan (OSCP), Fire Protection Plan, and the Emergency Response plan (ERP) will be updated, where required, to reflect the proposed activity.

Prior to initiation of the truck loading activity, ExxonMobil will meet with the Systems Safety and Reliability Review Committee (SSRRC), as required, to review and discuss details of the activity

such as Piping & Instrumentation Diagrams (P&Ds) and Management of Change (MOC) documents.

8. ENVIRONMENTAL PROTECTION AND PUBLIC SAFETY

ExxonMobil will take all prudent steps to mitigate potential impacts posed by the emergency trucking activity. With respect to environmental protection and public safety, ExxonMobil proposes the following mitigation measures:

- **Env-1:** Restrict all site development and operational activity to existing disturbed areas and not remove any habitat or native vegetation without prior disclosure and consent from the County biologist;
- **Env-2:** Containment berms around the loading area will prevent the unlikely spread of oil or fuels during loading;
- **Env-3:** Minimize air emissions to the maximum extent feasible and practical; Minimize dust generation on unpaved areas in TT.

With respect to public safety, ExxonMobil will implement the following measures:

- **Safe-1:** Restrict access to the LFC facility to prevent members of the public from accessing the loading areas;
- **Safe-2:** All trucks leaving the LFC facility will travel westward to the Refugio Road onramp at Highway 101, thus avoiding vehicle and pedestrian traffic associated with the El Capitan Campground;
- **Safe-3:** All trucking activity will subject to the requirements of the Crude Oil Transportation Risk Management & Prevention Program- CO-TRMPP (Reference Attachment C.4).;
- **Safe-4:** Temporary night lighting will be installed at the LFC truck loading area to facilitate night-time loading activities. All such lighting will conform to the LFC's approved lighting plan. The lighting will be shielded and oriented such that light spill into adjacent areas is limited to the maximum extent feasible;
- **Safe-5:** Fire hydrants will be operational at the loading area at all times;
- **Safe-6:** At least one (1) operator will support truck loading facilities at all times;
- **Safe-7:** LFC site personnel will be available to assist with any unplanned issues.

EXHIBITS 1A AND 1B
LFC TRUCK LOADING AREA AND PROPOSED PIPING
CONNECTIONS

Exhibit 1A - LFC Truck Loading Area and Proposed Piping Connections

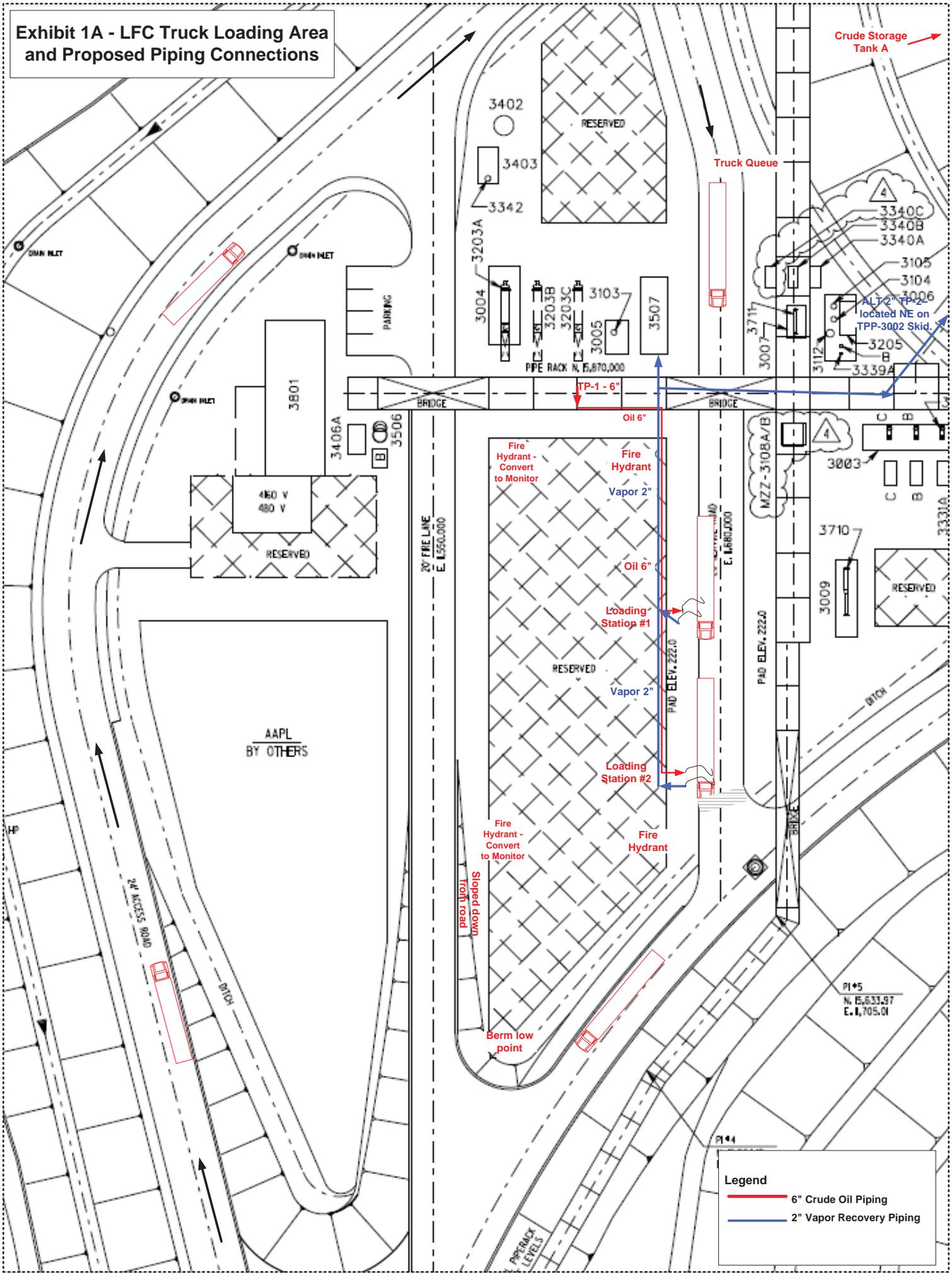
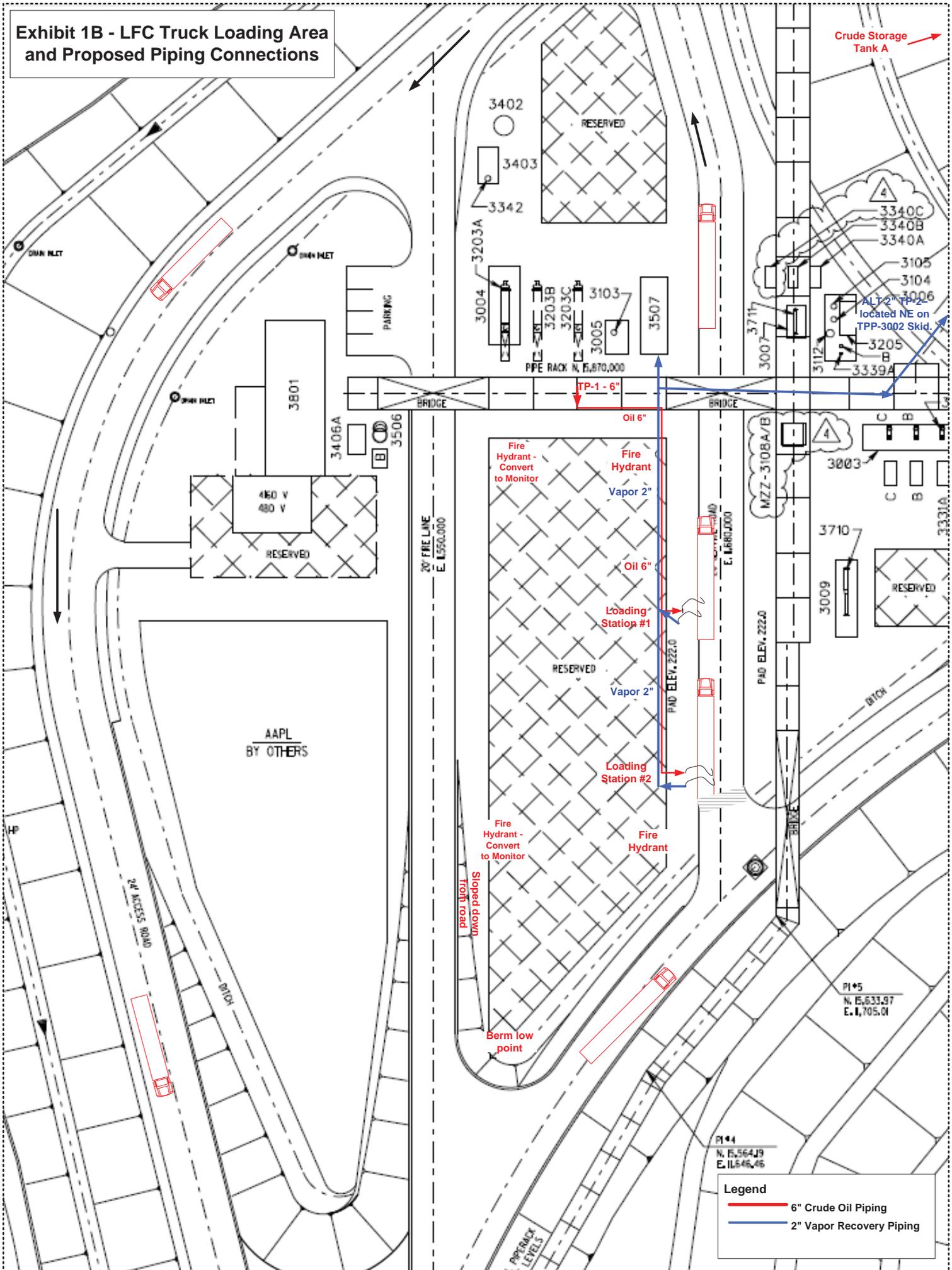


Exhibit 1B - LFC Truck Loading Area and Proposed Piping Connections



Legend

- 6" Crude Oil Piping
- 2" Vapor Recovery Piping

EXHIBIT 2
LFC TRUCK LOADING SCHEMATIC

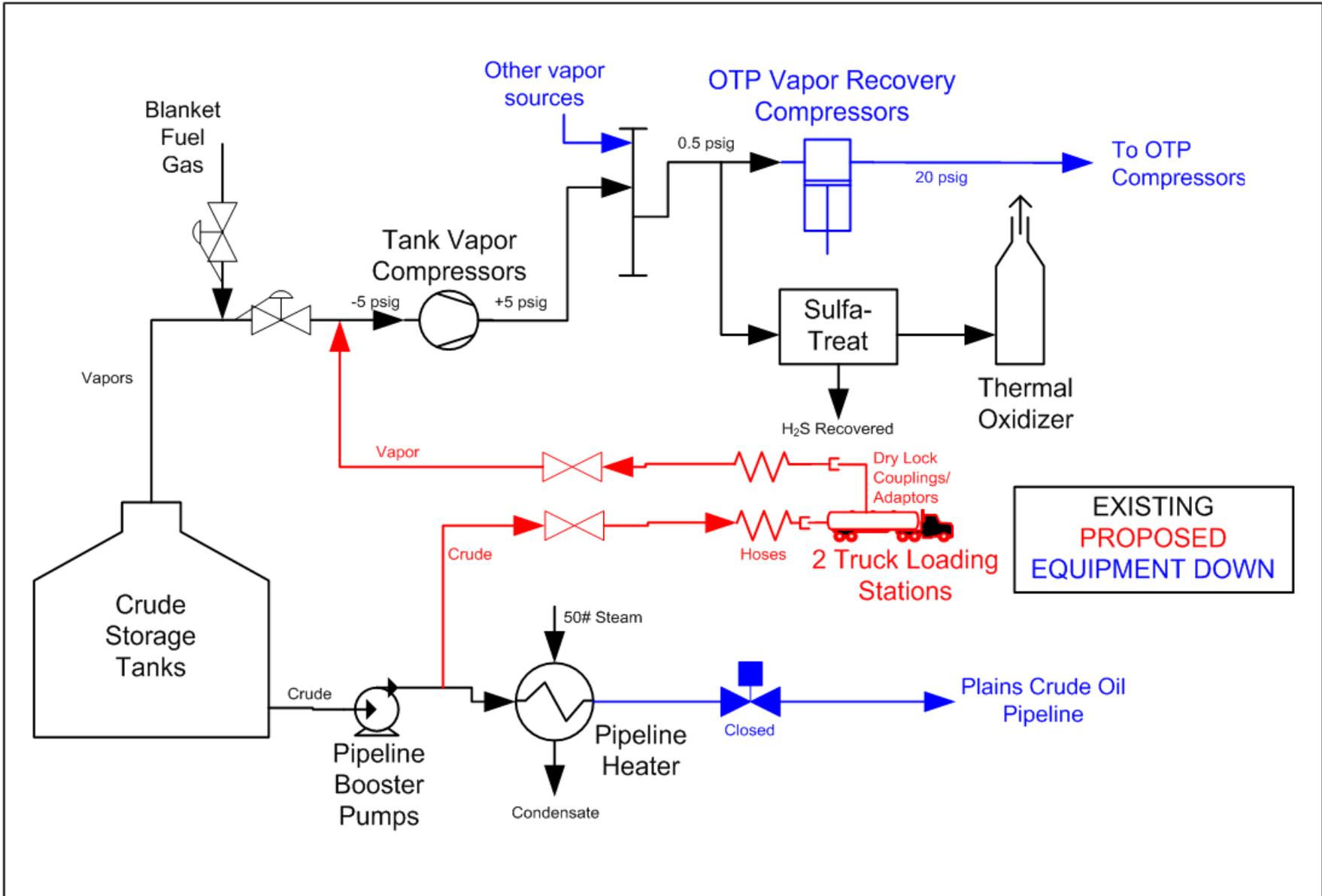


EXHIBIT 3
TRUCK ROUTING WITHIN LFC TT

**Exhibit 3 -
Truck Routing
within LFC TT**

Las Flores
Canyon

**Crude Storage
Tank A**

**2 Load
Stations**

Crude Tanker Traffic



**ATTACHMENT A.4
JUSTIFICATION OF EMERGENCY**

**EXXONMOBIL- SANTA YNEZ UNIT
EMERGENCY TRUCKING ACTIVITY TO DE-INVENTORY LFC CRUDE
STORAGE TANKS**

JUSTIFICATION OF EMERGENCY

TABLE OF CONTENTS

1.0	Introduction	2
2.0	County Permitting Requirements and Policies	2
3.0	Facility Background and Emergency Conditions	2
4.0	Review of Applicable LUDC Provisions and Comprehensive Plan Policies	4
4.1	ExxonMobil FDP	4
4.2	Land Use Development Code Provisions	4
4.3	Land Use Elements	6
4.4	Circulation Element	6
4.5	Local Coastal Plan	7
4.6	Hazardous Waste Elements	7
4.7	Safety Element	7

1.0 Introduction

ExxonMobil Production Company, a division of Exxon Mobil Corporation (ExxonMobil or “Applicant”) requests approval of an Emergency Permit for temporary trucking activity to de-inventory (empty) the processed crude oil (product) in the Crude Storage Tanks from the Santa Ynez Unit (SYU) facility located in Las Flores Canyon (LFC) approximately twelve (12) miles west of Goleta.

The proposed activity would consist of the following activities:

- Utilization of crude tanker trucks (trucks) to de-inventory product currently stored in the two Crude Storage Tanks in LFC (Tank A and Tank B) over a 3-6 month period;
- Minimal facility modifications within LFC to include extension of existing piping to allow loading of up to two trucks at an existing disturbed portion of the LFC Transportation Terminal (TT); in addition, two Lease Automatic Custody Transfer (LACT) units may be installed at the TT for royalty determination purposes, if required by Bureau of Safety and Environmental Enforcement (BSEE);
- Transportation limited to no more than thirty trucks per day of product from LFC to either of two offsite locations, one in Santa Barbara County (P66 Truck Rack in Santa Maria) and one in Kern County (Plains All American Truck Rack in Pentland). These designation facilities are currently permitted to handle this type of crude truck unloading and have the equipment and capacity to accommodate the expected number of trucks for the proposed activity.

2.0 County Permitting Requirements and Policies

The County’s Land Use and Development Code (LUDC) Section 35.82.090 E.2 contains three findings, all of which must be made in order to grant an Emergency Permit. This section of the code allows for the issuance of an Emergency Permit with the intent to, “modify the customary purposes for permit processing and temporarily by-pass the permit requirements of this Development Code in the case of an emergency.” The code requires that the normal permitting requirements be initiated and processed after the Emergency Permit is approved.

An emergency is defined in the Glossary of the County’s LUDC, Section 35.11, as:

“A sudden unexpected occurrence demanding immediate action to prevent or mitigate loss or damage to life, health, property, or essential public services...”

3.0 Facility Background and Emergency Conditions

Operational Background- On May 19, 2015 an incident occurred where a failure in the Line 901 pipeline (operated by Plains All American Pipeline Company) resulted in the shutdown of the pipeline that SYU had utilized to transport crude to refineries. Recently it was determined that the subsequent pipeline repairs will prevent the pipeline from returning to active service for a number of months, if not years. During that time, the LFC facility can no longer quickly empty the LFC Crude Storage Tank volumes (~425,000 Barrels) in response to a natural disaster or unforeseen circumstance. The ExxonMobil Final Development Plan for the SYU facilities only

allow for the transport of crude oil out of LFC via the Plains All American Pipeline (PAAPL) unless other transportation modes are permitted. As a result, ExxonMobil has reviewed the current situation with the shutdown of the PAAPL and believes it prudent to de-inventory the LFC Crude Storage Tanks as soon as practical for the following reasons:

- ExxonMobil's LFC emergency response plan has been impacted in its ability to respond appropriately to unforeseen circumstances, such as natural disasters, because of the unique event of the shutdown of the PAAPL for an unknown but extended period of time;
- ExxonMobil's normal response to natural disasters would be to de-inventory storage tanks via the pipeline as soon as possible. With the shutdown of the PAAPL, this cannot be completed in an expedient manner;

Additional, under the LFC SIMQAP program, best operating practice would be to de-inventory crude tanks for an extended shutdown period. Also, the recirculation of crude in the storage tanks requires keeping portions of LFC operational resulting in energy consumption and associated emissions.

Finding 1: An emergency exists and requires action more quickly than provided for by the customary procedures for permit processing.

ExxonMobil believes that the current situation at LFC meets the requirements of this Finding. The inability to utilize the PAAPL has created an unusual risk to the facility. The lack of a pipeline to quickly empty the LFC Crude Storage Tanks during a natural disaster or unforeseen circumstance, could potentially result in the loss or damage to property, the environment, or essential public services.

This risk would be eliminated by the preventative removal of inventory, which could take place within a relatively short time (~3-6 months). This is in comparison to indications of a much longer timeframe that the County has provided.

Customary procedures for normal permit processing to allow trucks to empty the LFC Crude Storage Tanks would take a minimum of 6 to 12 months with another 3-6 months to complete the de-inventory.

Finding 2: The action proposed is consistent with the policies of the Comprehensive Plan, including any applicable community or area plan and the requirements of this Development Code.

ExxonMobil believes that the temporary use of trucks over a short time period to empty the LFC Crude Storage tanks is consistent with the policies of the Comprehensive Plan, including any applicable community or area plans and the requirements of this Development Code. Applicable policies are reviewed below.

4.0 Review of Applicable LUDC Provisions and Comprehensive Plan Policies

4.1 ExxonMobil FDP

ExxonMobil FDP Condition VI-1: Requires the transportation of oil processed at ExxonMobil's oil treatment facility by pipeline. Transportation by a mode other than pipeline may be permitted only in accordance with Coastal Zoning Ordinance Section 35-154.5(i).

ExxonMobil's review of CZO 35.154.5(i) indicates that this section references "permits for expanding, modifying, or constructing oil processing or related facilities" and requires that such activities be conditioned to require that all oil processed by the facility be transported from the facility by pipeline with the exception that oil can be transported by a mode other than pipeline within certain limitations.

- The proposed activity at LFC to empty the Crude Storage Tanks does not expand, modify, or involve construction of oil processing or related facilities. The oil processing and related facilities are existing at LFC. The proposed activity would require installation of several connections from the process pipe rack to a truck loading area for the purpose of emptying the Crude Storage Tanks. These piping connections would either be removed or taken out of service once the de-inventory process is complete.
- The limitations associated with transporting processed oil by a mode other than pipeline (Section 5.i) are reviewed below:
 - Within limits of the permitted capacity of the alternative mode (5.i.1): The trucking of processed oil from LFC is not currently allowed in the existing permits unless other modes of transportation are permitted. Due to the shutdown of the PAAPL, ExxonMobil is requesting an Emergency Permit to allow temporary trucking solely for the purpose of emptying the LFC Crude Storage Tanks.
 - When environmental impacts of alternative transportation mode are required to be mitigated to the maximum extend feasible (5.i.2): ExxonMobil agrees to mitigate the environmental impacts associated with the truck operations to the maximum extent feasible- reference Sections A.3, C.1, C.2 and C.3.
 - When shipper has made a commitment to the use of a pipeline when operational (5.i.3): ExxonMobil has committed to using a pipeline to transport SYU processed oil when it becomes operational or permit another transportation mode.
 - When County has determined use of a pipeline is not feasible by making one of the following findings (5.i.4): ExxonMobil believes that sub-part a) (pipeline unavailable) is the current applicable situation.

4.2 Land Use Development Code Provisions

LUDC 35.51.070 B: Requires certain development standards for onshore processing facilities related to offshore oil and gas development.

- The proposed activity at LFC to empty the Crude Storage Tanks comply with the "development standards for onshore processing facilities" as noted below. Most of these

development standards are addressed by existing SYU requirements or conditions; the proposed activity would have no additional impact.

- The proposed activity will comply with the identified regulations.
 - Noise: Proposed activity will not substantially change the noise generated at LFC;
 - Authority to Construct: ExxonMobil will obtain an APCD Authority to Construct/Permit to Operate for the emissions associated with the truck loading operations at LFC;
 - Smoke: Proposed activity will not generate visible emissions of smoke;
 - Visual compatibility: Proposed activity are within a developed area and will be compatible with the surroundings; trucking activity will be temporary and consistent with current activity along the transportation routes;
 - Outdoor lighting: Proposed activity may require the installation of temporary additional lighting for safety- all lighting will be shielded so as not to directly shine on adjacent properties;
 - Grading: Proposed activity grading will be minimal, if required (i.e., containment berm) and not change natural drainage;
 - Erosion: Proposed activity will include adequate measures to prevent erosion under the existing SWPPP;
 - Exterior color: Installed piping associated with proposed activity will blend in with existing facilities;
 - Transportation of processed oil: Reference review of CZO 35.154.5(i) above (same condition);
 - Delivery hours: Proposed activity will not utilize streets within a residential zone;
 - Equitable, nondiscriminatory access to consolidated facilities: Proposed activity will not impact existing SYU requirements;
 - Facility and site abandonment: Proposed activity will not impact existing SYU condition;

LUDC 35.52.060 B: Requires certain development standards for applicable zones in which treatment and processing facilities are allowed.

- The proposed activity at LFC to empty the Crude Storage Tanks will comply with “development standards for treatment and processing facilities”. The onshore processing facilities are currently in place at LFC and are not being modified.
- The proposed activity will comply with the identified regulations.
 - Noise: Reference review of LUDC 35.51.070 B above (same condition);
 - Outdoor lighting: Reference review of LUDC 35.51.070 B above (same condition);
 - Visible gas flares: Proposed activity will not alter this existing requirement;
 - Grading: Reference review of LUDC 35.51.070 B above (same condition);
 - Erosion: Reference review of LUDC 35.51.070 B above (same condition);
 - Prevention of access: Proposed activity will not impact access;
 - Truck operating hours and routes: Proposed activity will not utilize streets within a residential zone;
 - Noxious odors: Proposed activity will not generate noxious odors;
 - Equitable, nondiscriminatory access to consolidated facilities: Proposed activity will not impact SYU requirement;

- Transportation of processed oil: Proposed activity will not change requirement to transport SYU processed oil by pipeline during normal operations to final refining destination unless other transportation modes are permitted; Currently SYU operations have been shutdown with the shutdown of the PAAPL; Truck transportation of product from LFC Crude Storage Tanks is required due to lack of ability to utilize existing pipeline; No transport by waterborne vessel will be utilized;
- Additional standards: Proposed activity will not impact existing SYU requirements;
- Facility and site abandonment: Proposed activity will not impact existing SYU requirements;

LUDC 35.55.040 B: Requires certain findings for Development Plans for Treatment and Processing Facilities within South Coast Consolidated Planning Area.

- This regulation does not appear to apply to the proposed activity at LFC to empty the Crude Storage Tanks.

LUDC 35.84.040: Requires development of a new land use authorization through a planning permit granted in compliance with this Development Code and shall be established only as approved by the review authority and in compliance with any conditions of approval, except when the change is approved in the following manner: Minor Changes, Substantial Conformity Determination, Amendment, or Revision.

- This regulation does not appear to apply to the proposed activity at LFC to empty the Crude Storage Tanks.

4.3 Land Use Elements

- Hillside and Watershed Policy 7: Proposed activity will not degrade water quality of groundwater basins, nearby streams, or wetlands. Operations will be conducted in an existing developed area that has proper drainage and containment.
- Land Use Development Policy 12: Proposed activity will not change requirement to transport SYU processed oil by pipeline during normal operations to final refining destination unless other transportation modes are permitted; Currently SYU operations have been shutdown with the shutdown of the PAAPL; Truck transportation of product from LFC Crude Storage Tanks is required due to lack of ability to utilize existing pipeline; No transport by waterborne vessel will be utilized;
- Visual Resource Policy 2: Proposed activity will not change the existing LFC height, scale, and design of structures. Operations will be conducted within an existing developed area.

4.4 Circulation Element

- Policy E: The proposed activity is consistent with the Land Use Element's Land Use Development Policy #4 with regard to roadway and intersection capacity. The application contains in Attachment C.2 a Trucking Quantitative Risk Analysis. This analysis demonstrates that the trucking operations will not significantly impact roadway and intersection capacity.

4.5 Local Coastal Plan

- Policy 6-3: LFC has been subjected to a previous environmental review that provided a number of mitigation measures to reduce environmental impacts. Proposed activity will not substantially change the results of the previous environmental review.
- Policy 6-8: Proposed activity will not change requirement to transport SYU processed oil by pipeline during normal operations to final refining destination unless other transportation modes are permitted; Currently SYU operations have been shutdown with the shutdown of the PAAPL; Truck transportation of product from LFC Crude Storage Tanks is required due to lack of ability to utilize existing pipeline;
- Policy 6-9: Proposed activity will not significantly change the existing emergency response plan. LFC Operations will review the current plan to determine if additional measures are required for the proposed activity.

4.6 Hazardous Waste Elements

- 7-1: Proposed activity will utilize the Crude Oil Transportation Risk Management and Prevention Program (Reference Attachment C.4) to promote strong enforcement of existing laws for full protection of public health and the environment.
- 7-2: Proposed activity will utilize the existing SYU risk management strategies for hazardous waste transportation in the County. LFC Operations will review the current strategies to determine if additional measures are required for the proposed activity.

4.7 Safety Element

- Policy Hazardous Facility Safety 1-A: Risk Estimates: Proposed activity will not significantly change the existing risks associated with operation of LFC facilities. LFC Operations will review the risks associated with the proposed activity to determine if additional measures are required.
- Policy Hazardous Facility Safety 2-B: Unacceptable Risk Involving Modifications to Existing Development: Risk Estimates: Proposed activity will not exceed any of the criteria that represent an unacceptable high level of risk. Reference Attachment C.2, Trucking Quantitative Risk Analysis and Attachment C.3, LFC Loading Risk Analysis.

Finding 3: Public comment on the proposed emergency action has been received.

Santa Barbara County to address this finding.

**ATTACHMENT B.1
VICINITY MAP**

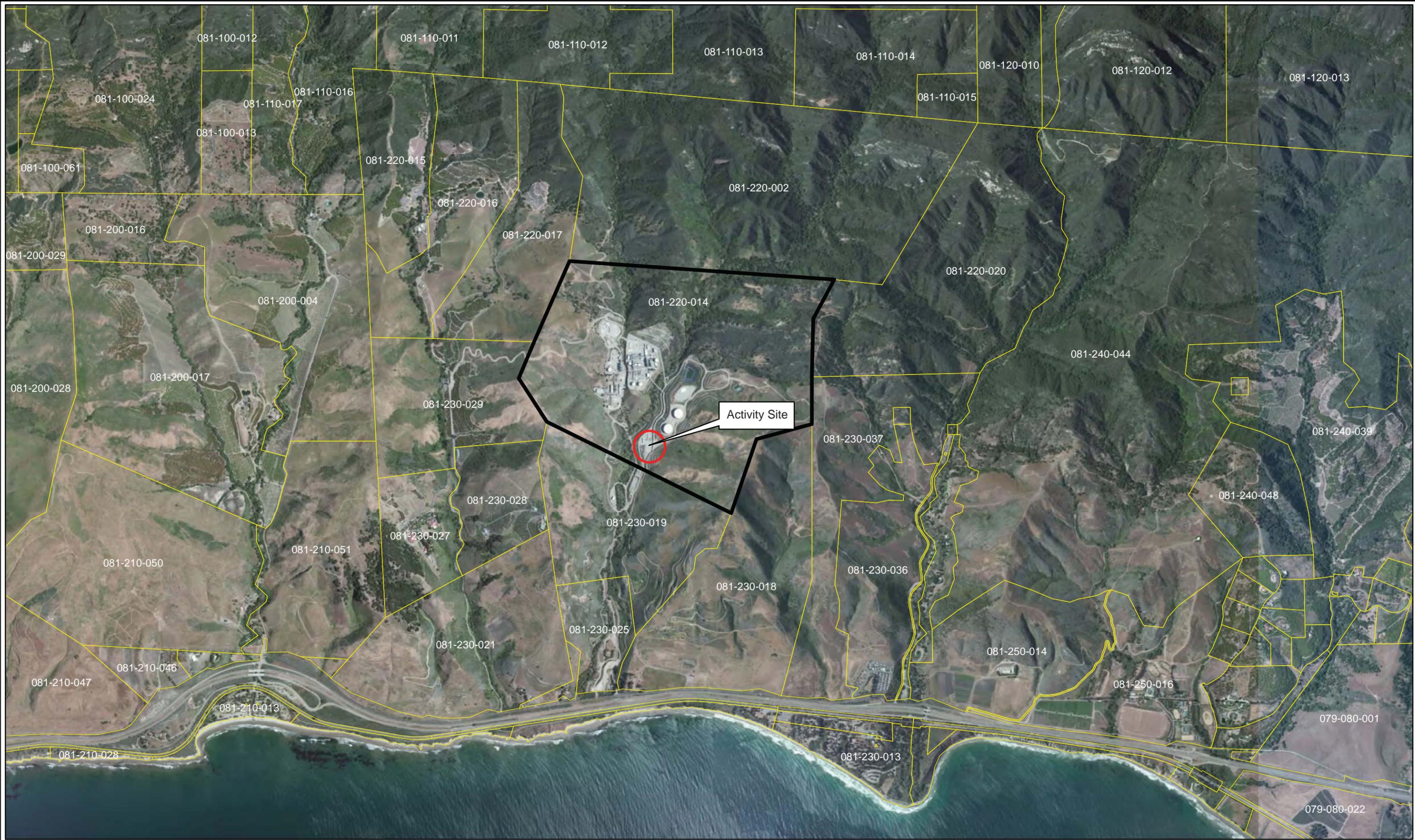


Source: GCS, NAD 83
Santa Barbara County,
California



Vicinity Map
Las Flores Canyon Facility
Exxon Mobil

**ATTACHMENT B.2
FACILITY APN MAPS**



Source: GCS, NAD 83
 Santa Barbara County,
 California

Legend

- LFC Parcel
- Assessors Parcels



Parcel Map
 Las Flores Canyon Facility
 Exxon Mobil

POR. RANCHO CANADA DEL CORRAL

81-22



NOTICE
 Assessor Parcels are for tax assessment purposes only and do not indicate either parcel legality or a valid building site.

Assessor's Map Bk, 081-Pg, 22
 County of Santa Barbara, Calif.

LD/03 3,8,11,230-05,230-06 into 20, 230-35, 230-36, 230-37; 05 into 230-31; 09 into 230-32; 10 into 230-34

**ATTACHMENT B.3
FACILITY SITE PLAN**



ExxonMobil



0 250 500 1,000 Feet

**Site Plan -
Las Flores Canyon Facility**

Prepared by:
InterAct

**ATTACHMENT B.4
SITE PHOTOS**



Image 1: Entrance to LFC, photo taken from south facing north

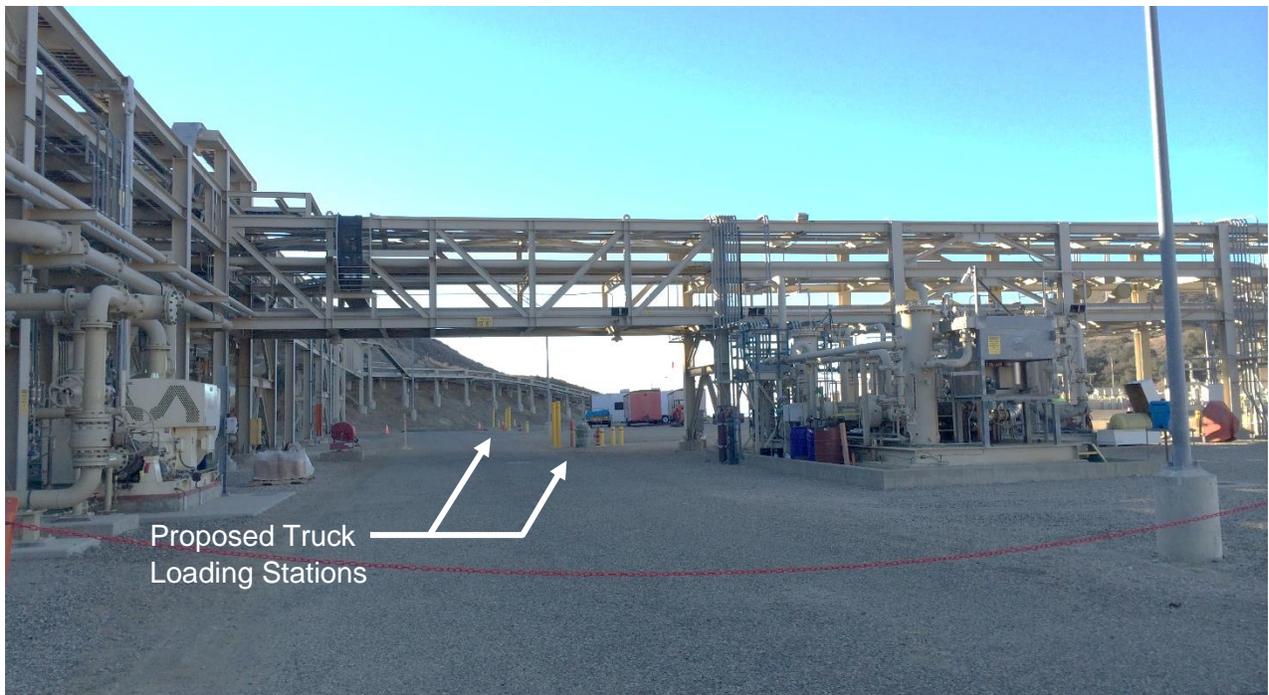


Image 2: Proposed truck loading locations at LFC, photo taken from north facing south



Image 3: Proposed truck loading location at LFC, photo taken from south facing north



Image 4: LFC Truck scale (on left) road (on right), photo taken from north facing south

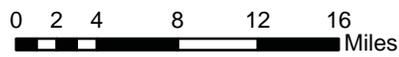
**ATTACHMENT B.5
TRUCK ROUTES MAPS**



Legend

-  Loading Location
-  Unloading Location
-  Crude Oil Truck Route

ExxonMobil



**Crude Oil Truck Transportation Route -
Las Flores Canyon to Unloading Destinations**

Prepared by:
InteAct





166

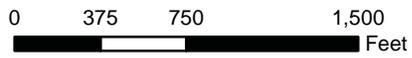
Plains Pentland Truck Rack



Legend

 Loaded Truck Route

ExxonMobil



**Transportation Route -
Plains Pentland Truck Rack from HW 166**

Prepared by:
InterAct



On-Ramp to US 101 (N Bound)

101

US 101 (S Bound) Exit 120 Off-Ramp

101

Legend

-  Loaded Truck Route
-  Empty Truck Return Route
-  US 101

Las Flores Canyon
Santa Ynez Unit Facility

Refugio Rd

Corral Canyon Rd

101

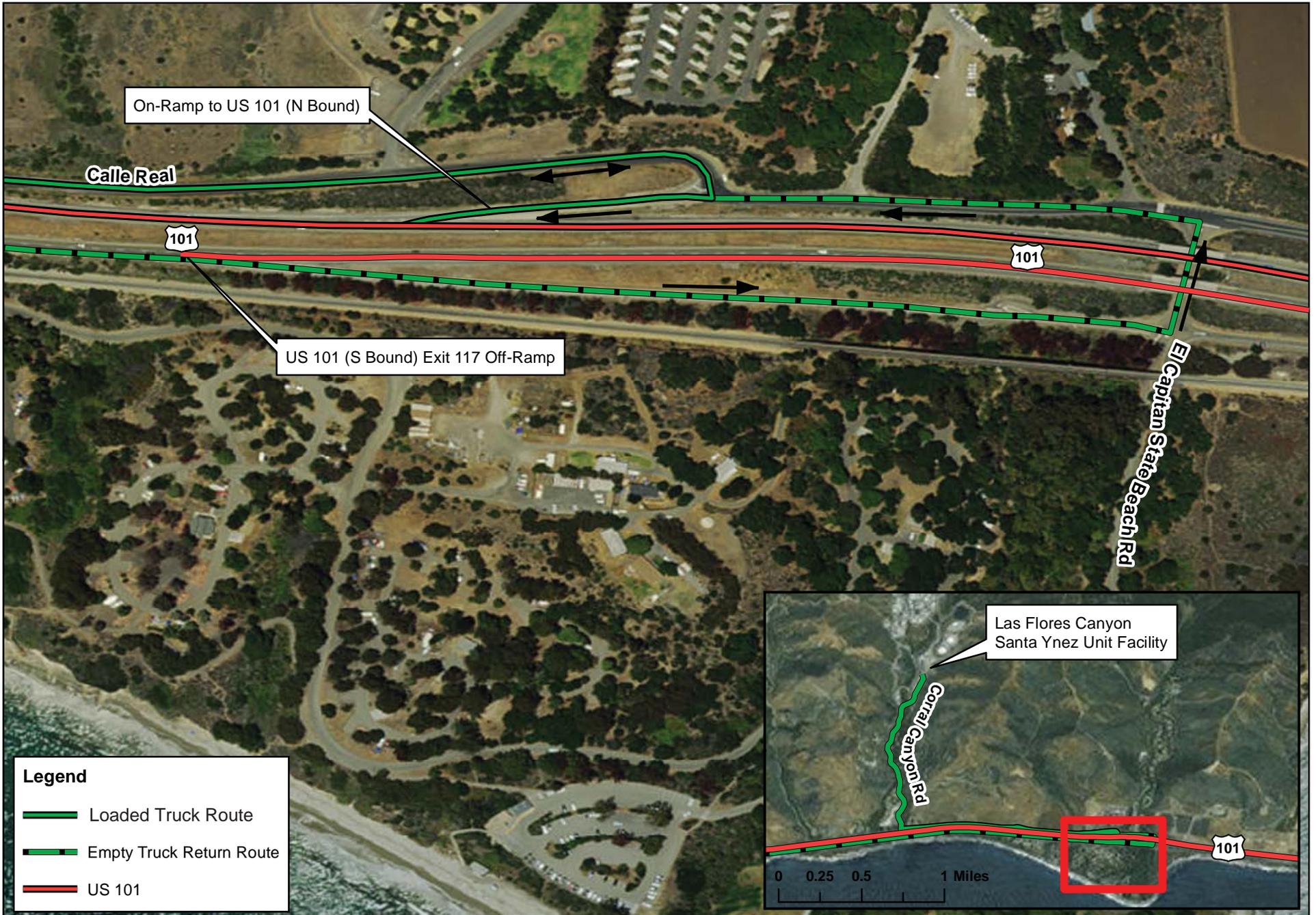
0 0.25 0.5 1 Miles



0 225 450 900 Feet

Primary Route From/To Las Flores Canyon Facility
US 101 - Exit 120 Interchange at Refugio Rd.

Prepared by:
InterAct



Legend

- Loaded Truck Route
- - - Empty Truck Return Route
- US 101

ExxonMobil

0 125 250 500 Feet

**Secondary Route From/To Las Flores Canyon Facility
US 101 - Exit 117 Interchange at El Capitan Rd**

Prepared by:
InterAct

ATTACHMENT B.6
TRUCK UNLOADING FACILITIES INFORMATION

EXXONMOBIL – SANTA YNEZ UNIT

EMERGENCY TRUCKING ACTIVITY TO DE-INVENTORY LFC CRUDE STORAGE TANKS

TRUCK UNLOADING FACILITIES INFORMATION

1. INTRODUCTION

The two crude oil truck unloading facilities (truck unloading facilities) considered in this application are listed below with facilities information provided in Section 2 and Section 3, respectively.

- Phillips 66 Santa Maria Pump Station located at 580 East Battles Road, Santa Maria, CA 93454 in Santa Barbara County (Section 2), and
- Plains All American Pipeline (PAAPL) Pentland Station located at 2311 Basic School Road, Maricopa, CA 93252 in Kern County (Section 3).

2. PHILLIPS 66 SANTA MARIA PUMP STATION

Facilities information for the Phillips 66 (P66) Santa Maria Pump Station is based upon a site visit by InterAct Engineers, performed on December 2, 2015 with P66 personnel. No pictures, electronic documentation, or hardcopy documentation was provided during the visit. However, InterAct was escorted by P66 personnel to the truck unloading Lanes 1 through 3 with verbal explanation of the facilities, operations, and maintenance activities provided by the escorts. P66 did allow hand documentation of observations by InterAct. The below paragraphs describe the facilities based upon observations and discussions with the P66 personnel.

The P66 Station operates 24 hours/day and 7 days/week including all holidays and weekends. Peak hours at the P66 Station are from 7 am to 4 pm daily and there is lighting for truck unloading at night.

There are four truck unloading Lanes (Lane 1 and 2 have Lease Automatic Custody Transfer (LACT) units, Lane 3 and 4 do not have LACT units). Lane 1 and 2 have local offload pumps, and Lane 3 and 4 do not have local offload pumps, which require a pump on the unloading truck for fluid transfer. LACT 1 on Lane 1 has a ticket printer with counter, basic sediment and water (BS&W) meter, insulated piping, pressure transmitter, temperature transmitter, 10-gallon sample pots, prover meter connections, and programmable logic controller (PLC) based control system. LACT 2 on Lane 2 has a ticket printer with counter, BS&W meter, insulated piping, pressure transmitter, temperature transmitter, 5 gallon sample pots, prover meter connections, and PLC based control system.

If the unloading truck oil temperature is lower than 100° F, the truck is not allowed to unload since the oil would be more viscous and is unable to be efficiently transferred.

Unloading trucks are accepted with a weight ticket from the loading facility, since there is no weight scale at the P66 Station. The P66 Station has dry lock connections on the facility hoses

with some couplings onsite at the truck unloading Lanes. Truck unloading procedure is posted at each of the Lanes and P66 Station personnel attend every truck unloading.

The facility has a single floating roof storage tank with 80,000 to 85,000 BBL shell capacity and a 60,000 to 70,000 BBL operating capacity. Trucks unload into the storage tank, and pumps transport the storage tank contents to the pipeline. Since the P66 Station is a truck unloading facility (not a truck loading facility), there is no vapor recovery system at the four Lanes or for the tank.

P66 personnel stated that currently the P66 Station is operating at one-third of its capacity. Before the PAAPL shutdown, the Station handled about 100 trucks/day, currently they handle about 130 trucks/day. The facility is not limited by permits to a specific number of trucks it can receive. The single storage tank is limited to 21,859 bbls/day (approximately 145 truckloads/day) oil throughput by the Santa Barbara County Air Pollution District Permit to Operate (APCD PTO).

A schematic of the Station based on an aerial is provided in Exhibit B.6-1.

Additional oil from LFC would constitute a fraction of the oil received by the facility, as the facility is designed for and already receives many oil trucks per day. Thus there will be no change in the facility operations, and thus a Management of Change (MOC) or additional Process Hazard Analysis (PHA) are not warranted.

3. PAAPL PENTLAND STATION

Facilities information for the Plains All American Pipeline (PAAPL) Pentland Station is based upon a site visit by InterAct Engineers, performed on December 3, 2015 with PAAPL personnel. Pictures were allowed, but no electronic documentation was provided during the visit. InterAct was escorted by PAAPL personnel to the truck unloading six middle Bays and one North Bay with verbal explanation of the facilities, operations, and maintenance activities provided by the escorts. PAAPL did allow hand documentation of observations by InterAct. The below paragraphs describe the facilities based upon observations and discussions with the PAAPL personnel.

The PAAPL Station operates 24 hours/day and 7 days/week including all holidays and weekends. Peak hours at the PAAPL Station are from 7 am to 4 pm daily and there is lighting for truck unloading at night. The PAAPL Station does shutdown for 4 hours per month for month end close-out.

There are six truck unloading Bays all without LACT units in the middle of the PAAPL Station, and one Bay with a LACT unit on the north side of the PAAPL Station. The six middle Bays have local offload pumps, and the north side Bay with LACT does not have a local offload pump. The north side Bay LACT has a ticket printer with counter, insulated piping, pressure transmitter, temperature transmitter, and sample pots. Producers provide weight ticket from the loading facility with periodic fluid property lab analysis. Unloading trucks are weighed on the onsite scale, oil is unloaded from the truck at one of the six middle Bays with transfer to storage tank, and the unloading trucks are weighed empty on the onsite scale prior to leaving the PAAPL Station. PAAPL performs periodic unloading truck spot check oil sample with lab analysis for basic sediment (BS&W) and API gravity. Since the PAAPL Station is a truck unloading facility (not a

truck loading facility), there is not a vapor recovery system at the Bays. The PAAPL Station has dry lock connections on the facility hoses at the truck unloading Bays. Truck unloading procedure is posted at each of the Bays at the PAAPL Station.

The facility has seven floating roof storage tanks, including a dedicated ExxonMobil storage tank (TK 204), which has a 100,000 BBL design capacity and an 85,000 to 86,000 BBL operating capacity.

Trucks that enter the station unload into one of the storage tanks, from which the oil is shipped into the oil pipeline. PAAPL personnel stated that currently the PAAPL Station is operating at one-third of its capacity. The PAAPL Station currently handles approximately 100 trucks/day, and the facility is designed to handle up to 210 trucks/day. The facility is not limited by permits to a specific number of trucks it can receive. The dedicated ExxonMobil storage tank TK 204 is limited to 120,227 bbls/day (approximately 800 truckloads/day) oil throughput by the San Joaquin Valley Air Pollution District Permit to Operate (APCD PTO).

PAAPL requires that the oil temperature in the incoming trucks is a minimum of 80° F and lower than 100° F due to PAAPL Station viscous flow and vapor pressure requirements. If the oil temperature is outside of this range, then oil is not allowed to be unloaded.

A schematic of the Station based on an aerial is provided in Exhibit B.6-1.

Additional oil from LFC would constitute a fraction of the oil received by the facility, as the facility is designed for and already receives many oil trucks per day. Thus there will be no change in the facility operations, and thus a Management of Change (MOC) or additional Process Hazard Analysis (PHA) are not warranted.

Exhibit B.6-1 - Schematic of the Phillips 66 Santa Maria Station



Exhibit B.6-2 - Schematic of the PAAPL Pentland Station

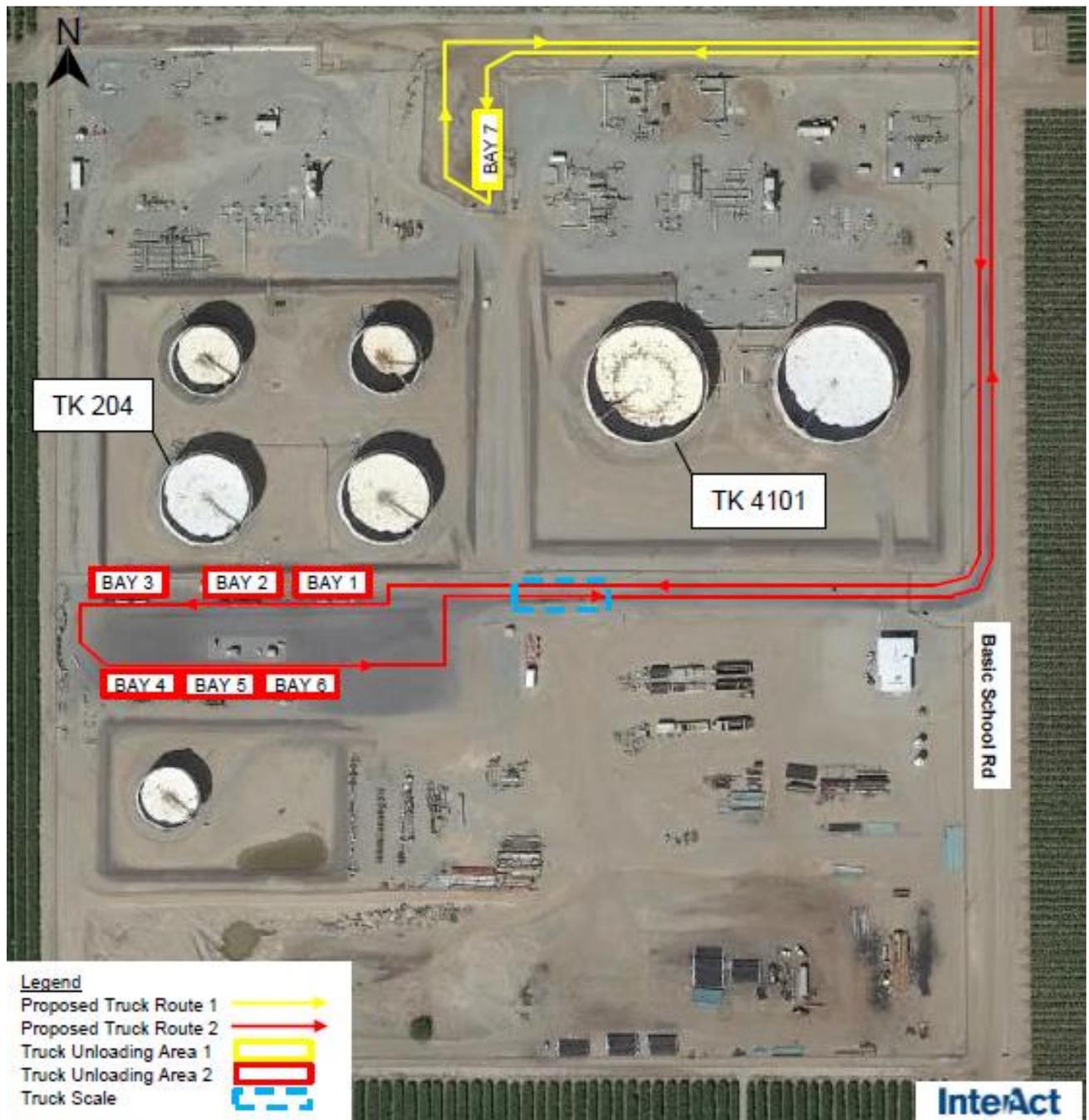


Exhibit B.6-3 - Photos of the Unloading Stations



Image 1: Entrance to P66 Santa Maria Pump Station, photo taken from northeast facing southwest.



Image 2: P66 Santa Maria Truck Pump Station lanes 1 and 2, photo taken from north facing south.



Image 3: Entrance to PAAPL Pentland Station, photo taken from north facing south.



Image 4: PAAPL Pentland Station truck scale (on left) and road (on right), photo taken from east facing west.



Image 5: PAAPL Pentland Station truck unloading bay 2, photo taken from northeast facing southwest.



Image 6: PAAPL Pentland Station truck unloading bay, photo taken from north facing south.

**ATTACHMENT C.1
AIR QUALITY ANALYSIS**

AIR QUALITY ANALYSIS

ExxonMobil Production Company, division of Exxon Mobil Corporation (ExxonMobil or “Applicant”) is requesting approval from the Santa Barbara County Air Pollution Control District (APCD) for the construction and operation of a crude truck loading area necessary to transfer product from the two LFC Crude Storage Tanks to trucks. The proposed activity will result in additional air emissions of Reactive Organic Compounds (ROCs) and respective greenhouse emissions expressed in carbon dioxide equivalents (CO₂e). Emission sources include piping components necessary to transfer product, emissions occurring during the loading operations, and emissions from the combustion of the residual hydrocarbon vapors routed to the facility Thermal Oxidizer. In addition, since the BSEE may require LACT units (fugitive components) be installed for royalty measurement determination, the fugitive component category includes the emissions from these components. Due to shut-in of production at SYU, however, total emissions for SYU will remain well below approved permit levels.

The emissions from the proposed loading operation are required to be controlled in accordance with the Best Available Control Technology (BACT) requirements defined in the APCD’s rules pertaining to New Source Review. ExxonMobil will control emissions occurring during the crude transfer process via the facility’s vapor recovery system. Captured vapors will then be routed to the existing Thermal Oxidizer for destruction.

Additionally, as the Exxon – Santa Ynez Unit stationary source has previously triggered the requirement to provide emission offsets under the APCD’s New Source Review regulation, all future projects must provide emission offsets. ExxonMobil will provide offsets from the temporary shutdown of equipment at the POPCO facility and at Platform Harmony and Platform Heritage. Greenhouse gas emissions are not required to be offset.

The estimated emissions from the proposed activity are as follows:

	ROC (Tons)	CO ₂ e (Tons)
Fugitive Hydrocarbon Components	0.151	2.027
Crude Loading Operations - VRU	1.295	3.206
Crude Loading Operations - Thermal Oxidizer	0.0013	25.767
Total Increase:	1.448	31.000

Note: As a contingency, the Fugitive Hydrocarbon Components category includes the emissions from operation of two LACT units which may be required by BSEE.

Please refer to the APCD application requesting an Authority to Construct/Permit to Operate for additional details regarding the proposed activity.

ATTACHMENT C.2
TRUCKING QUANTITATIVE RISK ANALYSIS



Quantitative Risk Analysis in support of Emergency Permit Application for Emergency Trucking Activity to De-inventory LFC Crude Storage Tanks

Date: January 2016

Prepared by:

InterAct

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TABLE OF CONTENTS

1.0	Introduction.....	1
2.0	Description of the Proposed Trucking Activity	2
3.0	Methodology	2
3.1	Hazards Identification.....	3
3.2	Probability Analysis	3
3.2.1	Truck Accident Probability	3
3.2.2	Spill and Pool Fire Probability.....	4
3.3	Consequence Analysis.....	4
3.3.1	Spill Volume	5
3.3.2	Spill Pool Area and Radius.....	5
3.3.3	Thermal Radiation Impact Areas	5
3.3.4	Impacted Population	6
3.3.5	Population Densities	6
3.4	Public Safety Risks Analysis	7
4.0	Probability and Consequence Analysis	7
5.0	Public Safety Risks	8
6.0	Conclusions	8
7.0	References	9

APPENDICES

Appendix 1	Truck Route Maps
Appendix 2	Santa Barbara County Public Risk Thresholds
Appendix 3	Risk Calculation Details
Appendix 4	Proposed Product Trucking Public Injury and Fatality F-N Curves

Quantitative Risk Analysis (QRA) in Support of Emergency Permit Application for Emergency Trucking Activity to De-inventory LFC Crude Storage Tanks

1.0 Introduction

This quantitative risk assessment (QRA) estimates the potential public safety risks associated with the proposed emergency crude oil (product) trucking activities for ExxonMobil's Las Flores Canyon (LFC) facility located at 12000 Calle Real Road in Goleta California in Santa Barbara County.

Public safety risks were calculated to be below the Santa Barbara County thresholds, and therefore the impacts to public risk from the proposed trucking activity are less than significant (Class III).

Product trucking is proposed from the LFC facility to the following locations:

1. Philips 66 Santa Maria Pump Station
2. Plains All American Pipeline Pentland Station

Product trucking is proposed as described in Table 1 below.

Table 1 Product Trucking Details

Parameter	Value
Maximum number of trucks	30 trucks per day
Maximum volume of product per truck	160 barrels (bbls) (worst case scenario for a single truck incident)
Total number of trucks	2,800 (worst case scenario for the number of trucks)
Maximum transportation duration	6 months (180 days) from start
Volume of oil transported	Approx. 425,000 Bbl (De-inventory two LFC Crude Storage Tanks)

This QRA was prepared in accordance with the requirements of the Santa Barbara County Planning and Development Department Environmental Thresholds and Guidelines Manual [Ref. 1], which specifies thresholds for significant impacts to public safety (Section 15). These thresholds focus on involuntary public exposure to acute risks that stem from certain types of activities with significant quantities of hazardous materials. In this case, the hazardous material of concern is crude oil (product) transported by trucks on public roads. In general, a QRA goal is to address worst case scenarios such that the maximum consequence can be evaluated. QRAs evaluate probability of various hazardous scenarios against the worst case consequences.

Public safety risks stem from a potential for a transportation-related incident involving trucks transporting LFC product. Under a worst-case scenario, an incident could lead to a product

spill that, if ignited, could result in a pool fire that could cause significant injury or fatality. Members of the public that could be exposed are those living or working in the areas that could be affected by a potential fire.

Public safety risks were estimated using the probabilities (annual chance of occurrence) of a truck incident, spill and fire, and consequences of serious injury and fatality of the public from the pool fire in the area of the proposed truck routes. Public safety risks estimated in this study were then compared to the Santa Barbara County’s thresholds to determine the significance of an adverse impact to public safety.

2.0 Description of the Proposed Trucking Activity

Trucking of product from LFC would occur to either or both of the two selected unloading facilities. The details of the routes and facility descriptions are provided in Table 2 below. The maps of the trucking routes are provided in Appendix 1.

Table 2 Trucking Routes Details

Parameter	Unloading Facility 1: Phillips 66 Santa Maria Station	Unloading Facility 2: PAAPL Pentland Station
Address	1580 East Battles Road Santa Maria, CA 93454	2311 Basic School Road, Maricopa, CA
Distance from LFC to destination facility	55 miles	139 miles
County	Santa Barbara	Kern
Route Details from LFC to the Unloading Facility	<ul style="list-style-type: none"> • South on internal LFC/SYU Road • Right onto Calle Real - 1.5 mi • Left onto Refugio Rd. - 197 ft • Right onto US-101 N ramp - 0.3 mi • Merge onto US-101 N - 49.2 mi • Exit 169, Betteravia Rd. - 0.2 mi • Left onto Rosemary Rd - 0.5 mi • Left onto E Battles Rd - 0.3 mi • Left into facility 	<ul style="list-style-type: none"> • South on internal LFC/SYU Road • Right onto Calle Real - 1.5 mi • Left onto Refugio Rd. - 197 ft • Right onto US-101 N ramp - 0.3 mi • Merge onto US-101 N - 54.4 mi • Exit 175, CA-166 E to Maricopa - 0.2 mi • Right onto CA-166 E/Cuyama Hwy - 80.7 mi • Right onto Basic School Rd - 0.3 mi • Right into facility

3.0 Methodology

The QRA evaluated risks using the following steps:

1. Potential hazards identification
2. Probability analysis

- 3. Consequence analysis
- 4. Public safety risk estimates

3.1 Hazards Identification

Hazards from product trucking could occur from a potential truck road accident or incident that causes an injury or fatality due to the impact with another vehicle or public member. An accident could be due to a collision with another vehicle or an object or a non-collision accident due to a driver error or truck mechanical failure. More severe hazards would involve an accident that leads to a spill and thermal radiation from a subsequent pool fire. An explosion or BLEVE are not expected from a truck accident because the product transported has relatively low vapor pressure thus formation of appreciable volume of flammable gas that can lead to an explosion is not expected.

Two hazard scenarios associated with product trucking were considered as provided in Table 3 below.

Table 3 Trucking Hazard scenarios

No.	Equipment	Potential Hazard Scenario	Hazards
1	DOT 407 Tanker Truck	Truck accident, large spill and pool fire	Thermal Radiation
2	DOT 407 Tanker Truck	Truck accident, small spill and pool fire	Thermal Radiation

3.2 Probability Analysis

3.2.1 Truck Accident Probability

The probability of the above mentioned hazards occurring were estimated as follows. A truck road collision accident probability on rural highways was set to be 0.528 per million miles (0.33 per million kilometers [km]) based on a study by Harwood, 1993 [Ref. 2]. The accident probability was then reduced using the following control factors: implementation of safety programs reduces accidents by 41%; speed control reduces accidents by 26% as listed by MRS, 2004 [Ref. 3]. The Crude Oil Transportation Risk Management and Prevention Program (CO-TRMPP) for this activity will require trucks transporting LFC product to have those controls through driver safety training and equipment installation.

Additionally, non-collision, in-transit accident rates were assumed to occur at a base rate of 20% of the collision accident rate. The non-collision rate was reduced by the controls to be implemented by ExxonMobil trucks: a reduction of 37% due to regular maintenance, and a reduction of 45% due to pre-trip truck inspection, as listed by MRS, 2004 [Ref. 3]

The resulting tanker truck spill rate (SR) was estimated to be as follows:

$$SR = [0.528/\text{million miles} \times (1-(0.41+0.26))] + [0.2 \times 0.528/\text{million miles} \times (1-(0.37+0.45))]$$

$$SR = 0.193 \text{ accidents million truck miles travelled or } 1.93 \times 10^{-7} \text{ accidents per mile}$$

3.2.2 Spill and Pool Fire Probability

For a pool fire to occur, there needs to be 3 probabilities taken into consideration, including: probability of a spill, probability of a large or small spill, and probability of the spilled oil vapor ignition (e.g., a spark or static electricity).

The 1993 Harwood study [Ref. 2] estimated the probability of a hazardous material release, given that an accident occurred, to be 9% for a rural freeway. A chance of ignition of an occurred pool fire was estimated at 2% based on the Golder, 2007 [Ref. 4]. It was assumed that large spills occurred 25% of the time, and leaks occurred 75% of the time, as a worst case scenario.

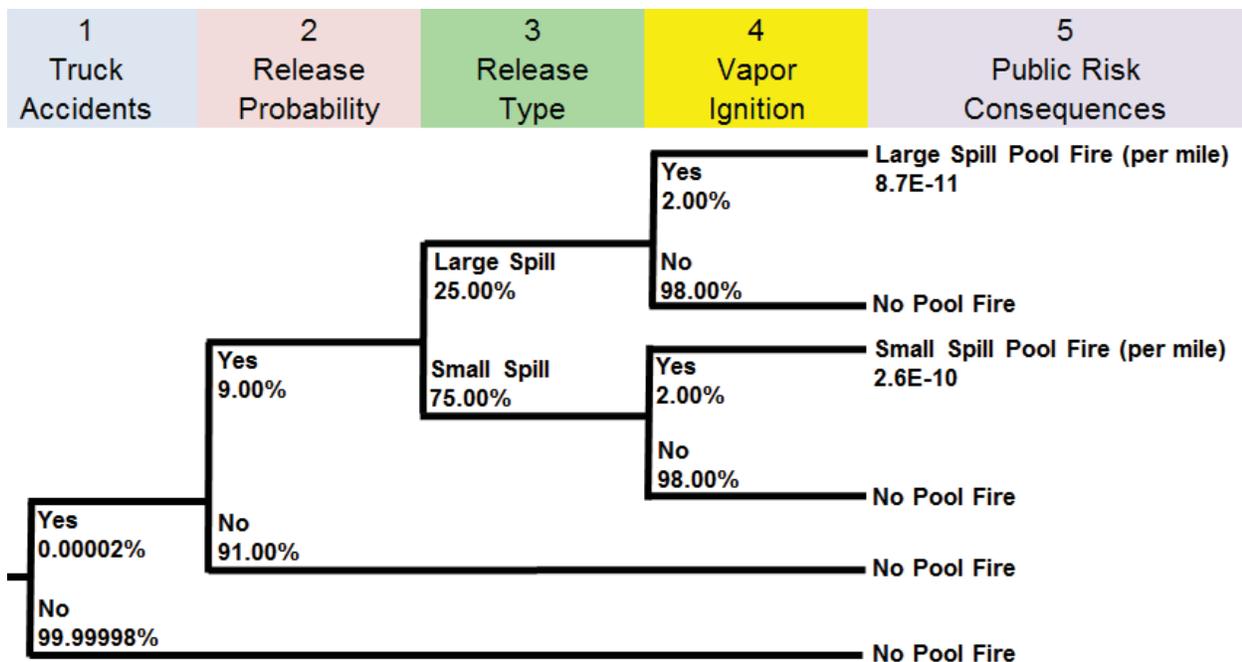
Thus, the likelihood of a pool fire (pool fire rate or PFR) is estimated as follows:

$$\text{PFR Large} = (0.193/\text{million miles}) \times 0.09 \times 0.02 \times 0.25 = 8.7 \times 10^{-11}$$

$$\text{PFR Small} = (0.193/\text{million miles}) \times 0.09 \times 0.02 \times 0.75 = 2.6 \times 10^{-10}$$

The Event Tree Analysis is presented in the Figure 1 below.

Figure 1 Trucking Hazards Event Tree



3.3 Consequence Analysis

Consequences from traffic accidents without a spill and a fire were used as identified in the Harwood 1993 study [Ref. 2]. Consequences from a pool fire were identified as follows for a small and large spill:

1. Volumes of potential spills were estimated
2. Spill area and radius were calculated
3. Thermal radiation distances for injury and fatality were calculated

4. Population affected by the respective thermal radiation levels was estimated

Toxic impacts are not expected because the product prepared for sales has a negligible hydrogen sulfide (H₂S) content.

3.3.1 Spill Volume

Two types of oil spills were considered:

- a full truck rupture releasing the entire 160 bbls (6,720 gallons); and
- a leak resulting in a 10% loss, or 16 bbls (672 gallons).

3.3.2 Spill Pool Area and Radius

Spill areas were estimated assuming 1 inch deep circular pool with the truck as a center of the circle.

$$R = \sqrt{(Spill\ Area/\pi)}$$

3.3.3 Thermal Radiation Impact Areas

For thermal exposure to fires or flames, the fatality exposure level was estimated to be 10 kilowatts per square meter (kW/m²) and the injury level to be 5 kW/m² [Ref. 3]. These levels are based on the time it takes to develop second degree burns.

The thermal radiation to injury and fatality levels are calculated per the methodology presented by Department of Transportation (DOT) and Environmental Protection Agency (EPA) [Ref. 5]:

$$X_{10} = 0.30 \times R \times EP^{0.57}$$

$$X_{05} = 0.43 \times R \times EP^{0.57}$$

Where R is the product spill pool radius determined in Section 3.3.2 above, EP is emissive power equal to 20 kW/m², X₁₀ is a radius where thermal radiation is 10 kW/m² or higher, and X₅ is a radius where thermal radiation is 5 kW/m² or higher.

Thermal impact areas A₁₀ and A₀₅ are assumed to be uniform circular areas assuming static meteorological conditions.

$$A_{10} = \pi \times (X_{10})^2$$

$$A_{05} = \pi \times (X_{05})^2$$

Where A₁₀ is area for ≥ 10 kW/m², and A₀₅ is area for ≥ 5 kW/m².

Table 4 below provides the details of the calculations.

Table 4 Product Release Volume, Area and Thermal Hazard Details

Truck Release Scenario	Volume			Area 1 inch deep pool		Spill Radius ft	Thermal Hazard Radius ft	Thermal Hazard Area sq. ft.
	bbls	gal.	cu. inch	sq. inch	sq. ft.			
Rupture (100%)	160	6,720	1,552,320	1,552,320	10,780	58.58	A ₀₅ : 138.9	29,514.5
							A ₁₀ : 96.9	60,635.9
Leak (10%)	16	672	155,232	155,232	1,078	18.52	A ₀₅ : 43.9	2,951.5
							A ₁₀ : 30.7	6,063.6

3.3.4 Impacted Population

Exposure to high heat levels can produce severe injury or fatality to exposed population within the specified area. Per Muhlbauer, 2004 ([Ref. 6], heat of 10 kW/m² would result in a fatality in approximately 40% of exposed population; heat of 5 kW/m² would result in injury after 15-20 seconds of exposure. Thus the number of fatalities and injuries for each pool and fire scenario were estimated as follows:

$$\text{No. of Fatalities} = (40\% \times A_{10}) \times \text{PD}$$

$$\text{No. of Injuries} = (60\% A_{10} + A_{05}) \times \text{PD}$$

Where PD is population density as number of people / square foot.

3.3.5 Population Densities

Population densities were estimated for accident scenarios along the trucking routes. The trucking route was subdivided into segments based on the different population density category along the roads. The population density was assumed to be constant over the entire length of a particular segment. If one side of the road was of a different population category than the opposite side of the road population category, an average of the two categories was used.

Population densities were estimated based on aerial imagery local zoning and field reconnaissance. Table 5 below summarizes the population densities used in this study, per the data published by Arthur D. Little, 1990 [Ref. 7].

Table 5 Population Densities Categories

Category	Population Density (No. of People / Sq. Mile)
Commercial High	10,000
Commercial Medium	5,000
Commercial Low	1,000
Residential High	10,000
Residential Medium	3,000
Residential Low	1,000
Mixed Use High	10,000
Mixed Use Medium	3,000
Mixed Use Low	1,000
Industrial	2,000
Rural/Farm	20
Recreational	100
Unpopulated/Open Space	5
Onsite / Private	0

3.4 Public Safety Risks Analysis

Public safety risks are based on the estimated probabilities (chance of occurrence) and consequences (serious injury or fatality) of the evaluated accident scenarios. The estimated accident risks were compared to the Santa Barbara County's thresholds to determine if adverse impacts from the proposed trucking activity are potentially significant. The two figures in Appendix 2 show the County's thresholds for Fatalities and Injuries respectively [Ref. 1]. Per the County, the plotted risk results should be interpreted as follows:

Class I – Adverse significant unavoidable impacts that cannot be mitigated: risks that fall into the Red and Amber Zones on the F-N curve.

Class II – Adverse significant impacts that can be potentially mitigated: risks that fall into the Red and Amber Zones, but that move into the Green zone with application of available mitigation measures.

Class III – Adverse impacts that are considered insignificant. For example, severe consequences that are unlikely or high likelihood hazardous events that do not have severe consequences are considered less than significant.

4.0 Probability and Consequence Analysis

Proposed product trucking probability and consequence analysis was conducted according to the methodology presented in Section 3.2 and 3.3, respectively. The details of the calculations conducted per the methodology outlined in Section 3 above, are presented in Appendix 3.

5.0 Public Safety Risks

Fatality and Injury F-N curves were constructed to show public safety risks from the proposed trucking activity, see Figures in Appendix 4. The Figures show the estimated frequencies of public injury and fatality occurrence (F) plotted against the potential number of injuries or fatalities (N) from the hazards evaluated in this study. As shown both public injury and fatality curves from the proposed activity are well within the “Green” zone.

6.0 Conclusions

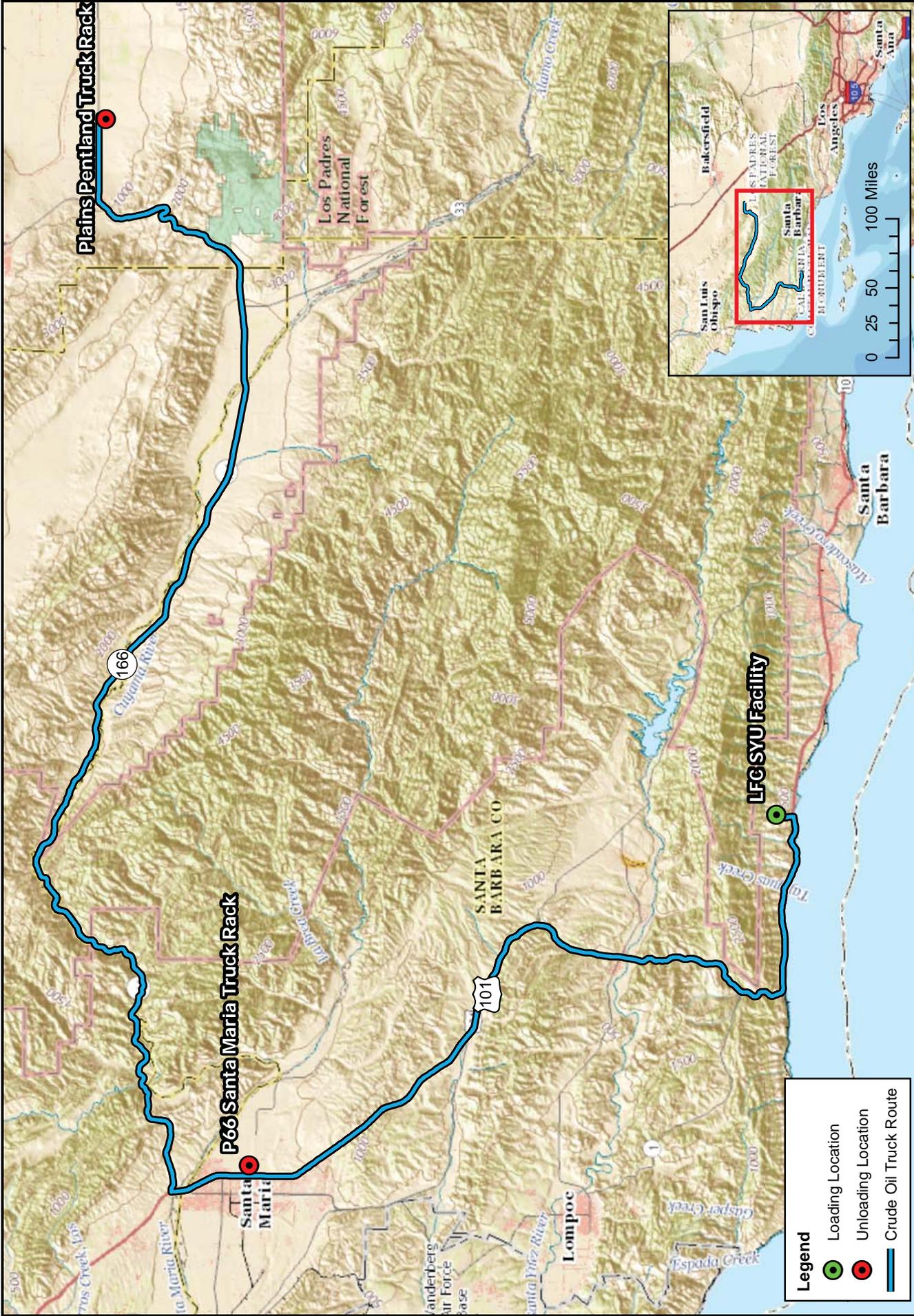
Public safety risks were calculated to be below the Santa Barbara County thresholds, as such the resulting F-N curves are entirely in the “Green” zone of the constructed F-N curves for both injuries and fatalities. Therefore, the impacts to public risk from the proposed trucking activity are less than significant (Class III).

7.0 References

1. Santa Barbara County Planning and Development, *Environmental Thresholds and Guidelines Manual*, October 2008, Revised July 2015.
2. Harwood, et. al., *Procedure for Developing Truck Accident and Release Rates for Hazardous Materials Routing*, Journal of Transportation Engineering, Vol 119, No. 2, March/April 1993.
3. Marine Research Specialists (MRS), *Nuevo LPG Transportation Risk Assessment Final Draft Report*, MRS, Ventura, CA March 2004.
4. Golder Associates, *Chevron San Ardo to Coalinga Heated Crude Oil Pipeline Risk Assessment Final Report*, Golder Associates, Inc., Roseville, CA, September 2007.
5. FEMA, USDOT, and USEPA, *Handbook of Chemical Hazard Analysis Procedures*, Washington D.C.
6. W. Kent Muhlbauer, *Pipeline Risk Management Manual, Third Edition: Ideas, Techniques, and Resources 3rd Edition*. ELSEVIER, 2004.
7. Arthur D. Little, *Risk Assessment for Gas Liquids Transportation from Santa Barbara County*, Santa Barbara, CA, July 1990.

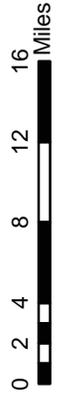
APPENDIX 1

TRUCK ROUTES MAPS



Legend

- Loading Location
- Unloading Location
- Crude Oil Truck Route



**Crude Oil Truck Transportation Route -
Las Flores Canyon to Unloading Destinations**

Prepared by:
InterAct





Legend

— Crude Oil Truck Route

ExxonMobil

0 375 750 1,500 Feet

Compass rose: N, S, E, W

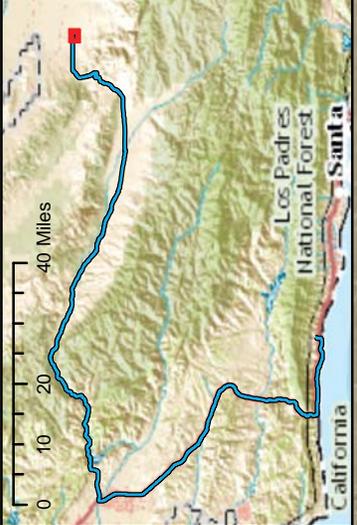
Crude Oil Truck Transportation Route - P66 Santa Maria Truck Rack from US HW 101

Prepared by: **InterAct**



Plains Pentland Truck Rack

Legend
Loaded Truck Route



ExxonMobil

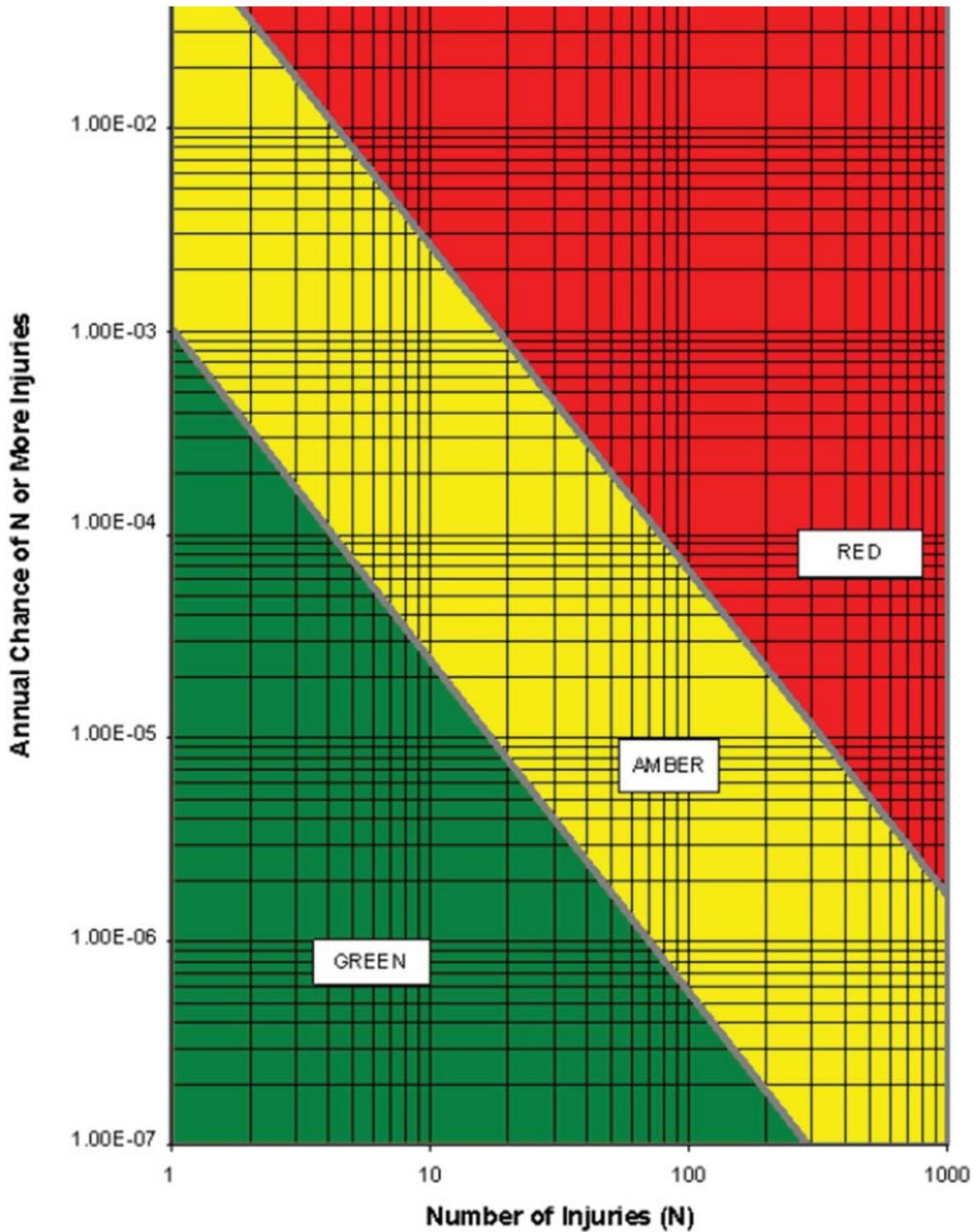
Transportation Route -
Plains Pentland Truck Rack from HW 166

Prepared by:
InterAct

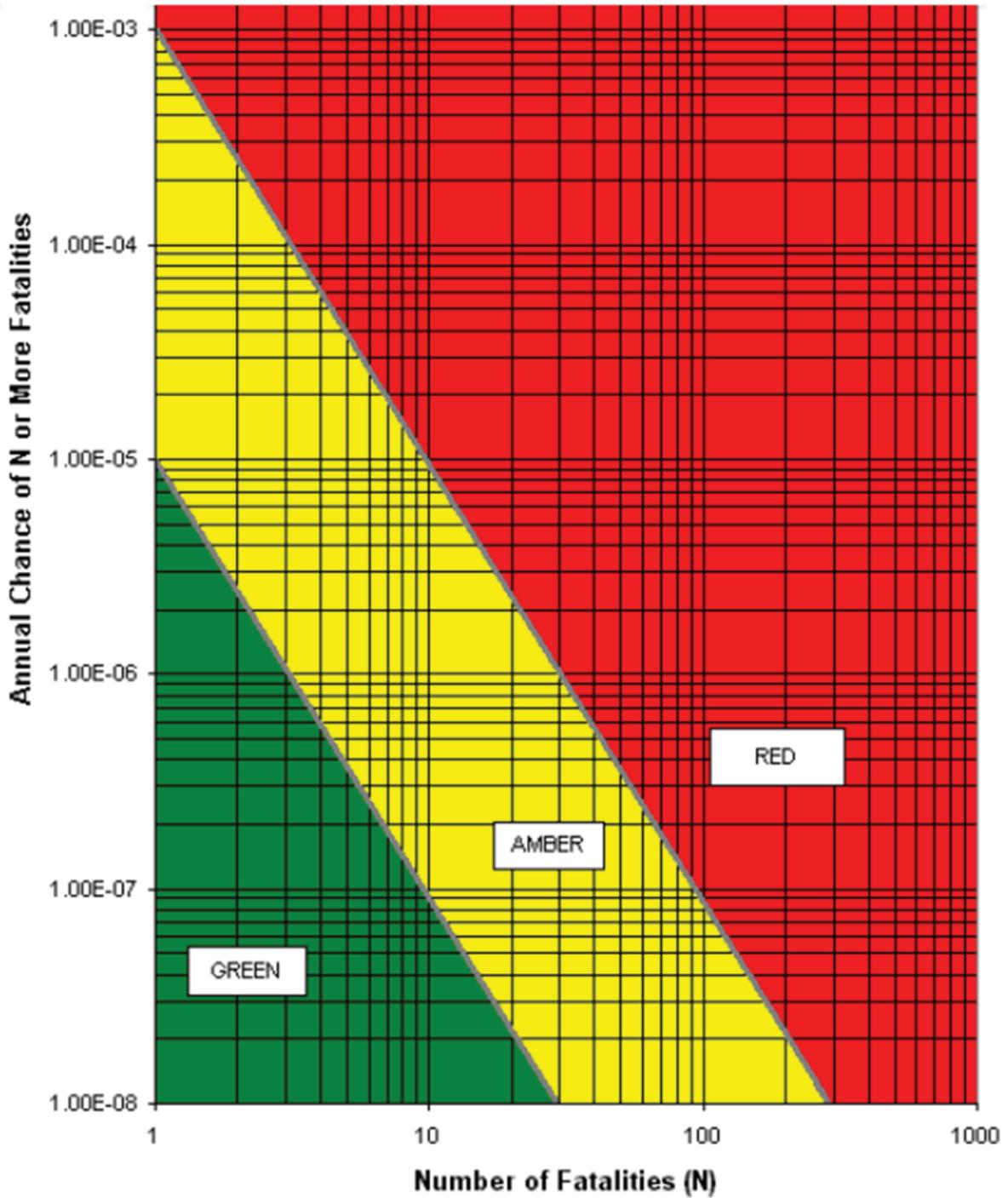
APPENDIX 2

SANTA BARBARA COUNTY PUBLIC RISK THRESHOLDS

Public Injury Risk Spectrum



Public Fatality Risk Spectrum



APPENDIX 3

RISK CALCULATION DETAILS

F-N CURVE DATA

Santa Barbara County Fatality Criteria

Red	/yr	Amber	/yr
1	1.00E-03	1	1.00E-05
300	1.00E-08	30	1.00E-08

Santa Barbara County Injury Criteria

Red	/yr	Amber	/yr
1	1.00E-01	1	1.00E-03
900	2.00E-06	300	1.00E-07

Data for Calculations

Sq. ft in sq. mile	27,878,400
Total truckloads, max	2,800

Scenario, Volume and Impact Area Calculations

Scenario	Spilled % of truck	Volume Spilled			Area			5 kW/m ² Radius ft	10 kW/m ² Radius ft	10 kW/m ² Area sq ft	5 kW/m ² Area sq ft	Probability - Accidents per mile
		bbls	gallons	cu. inch	sq. inch	sq ft	ft					
Rupture	100%	160	6,720	1,552,320	1,552,320	10,780	58.58	96.93	29,515	60,636	8.7E-11	
Leak	10%	16	672	155,232	155,232	1,078	18.52	30.65	2,951	6,064	2.6E-10	

Total Trucked Volume BBLs	Tanker Truck Volume BBLs/trip	Total Truck trips trips	Accident Rate per mile	Probability of Release	Probability of Large Spill	Probability of small Spill	Probability of Ignition

Injury Data for the FN Curve

Injuries	Accident Probability in Segment	Combined Probability
8	3.21E-07	3.21E-07
8	7.82E-08	3.99E-07
8	4.35E-07	8.34E-07
8	5.26E-07	1.36E-06
8	4.65E-08	1.41E-06
7	1.19E-07	1.53E-06
7	2.43E-07	1.77E-06
6	1.24E-07	1.89E-06
6	1.54E-07	2.05E-06
6	5.61E-08	2.10E-06
3	1.73E-07	2.28E-06
3	4.77E-07	2.75E-06
3	5.51E-08	2.81E-06
3	4.66E-08	2.85E-06
3	3.83E-07	3.24E-06
3	4.62E-08	3.28E-06
3	1.58E-08	3.30E-06
3	6.35E-08	3.36E-06
3	2.52E-08	3.39E-06
3	4.22E-08	3.43E-06
3	1.46E-07	3.58E-06
3	2.62E-07	3.84E-06
3	1.61E-07	4.00E-06
3	1.50E-07	4.15E-06
3	5.27E-08	4.20E-06
3	4.33E-06	8.53E-06
3	2.43E-08	8.55E-06
3	2.92E-07	8.85E-06
3	2.43E-07	9.09E-06
3	2.43E-07	9.33E-06
1	9.64E-07	1.03E-05
1	2.34E-07	1.05E-05
1	1.30E-06	1.18E-05
1	1.58E-06	1.34E-05
1	1.40E-07	1.36E-05
1	3.57E-07	1.39E-05
1	7.30E-07	1.46E-05
1	3.71E-07	1.50E-05
1	4.62E-07	1.55E-05
1	1.68E-07	1.56E-05
0	6.82E-07	1.63E-05
0	3.84E-08	1.64E-05
0	7.56E-07	1.71E-05
0	5.47E-08	1.72E-05
0	8.20E-07	1.80E-05
0	5.18E-07	1.85E-05
0	1.43E-06	1.99E-05
0	1.65E-07	2.01E-05
0	1.40E-07	2.02E-05
0	1.15E-06	2.14E-05
0	1.39E-07	2.15E-05
0	4.73E-08	2.16E-05
0	1.90E-07	2.18E-05
0	7.57E-08	2.18E-05
0	1.27E-07	2.20E-05

Fatality Data for the FN Curve

Fatalities	Accident Probability in Segment	Combined Probability
1	3.21E-07	3.21E-07
1	7.82E-08	3.99E-07
1	4.35E-07	8.34E-07
1	5.26E-07	1.36E-06
1	4.65E-08	1.41E-06
1	1.19E-07	1.53E-06
1	2.43E-07	1.77E-06
1	1.24E-07	1.89E-06
1	1.54E-07	2.05E-06
1	5.61E-08	2.10E-06
0	1.73E-07	2.28E-06
0	4.77E-07	2.75E-06
0	5.51E-08	2.81E-06
0	4.66E-08	2.85E-06
0	3.83E-07	3.24E-06
0	4.62E-08	3.28E-06
0	1.58E-08	3.30E-06
0	6.35E-08	3.36E-06
0	2.52E-08	3.39E-06
0	4.22E-08	3.43E-06
0	1.46E-07	3.58E-06
0	2.62E-07	3.84E-06
0	1.61E-07	4.00E-06
0	1.50E-07	4.15E-06
0	5.27E-08	4.20E-06
0	4.33E-06	8.53E-06
0	2.43E-08	8.55E-06
0	2.92E-07	8.85E-06
0	2.43E-07	9.09E-06
0	2.43E-07	9.33E-06
0	9.64E-07	1.03E-05
0	2.34E-07	1.05E-05
0	1.30E-06	1.18E-05
0	1.58E-06	1.34E-05
0	1.40E-07	1.36E-05
0	3.57E-07	1.39E-05
0	7.30E-07	1.46E-05
0	3.71E-07	1.50E-05
0	4.62E-07	1.55E-05
0	1.68E-07	1.56E-05
0	6.82E-07	1.63E-05
0	3.84E-08	1.64E-05
0	7.56E-07	1.71E-05
0	5.47E-08	1.72E-05
0	8.20E-07	1.80E-05
0	5.18E-07	1.85E-05
0	1.43E-06	1.99E-05
0	1.65E-07	2.01E-05
0	1.40E-07	2.02E-05
0	1.15E-06	2.14E-05
0	1.39E-07	2.15E-05
0	4.73E-08	2.16E-05
0	1.90E-07	2.18E-05
0	7.57E-08	2.18E-05
0	1.27E-07	2.20E-05

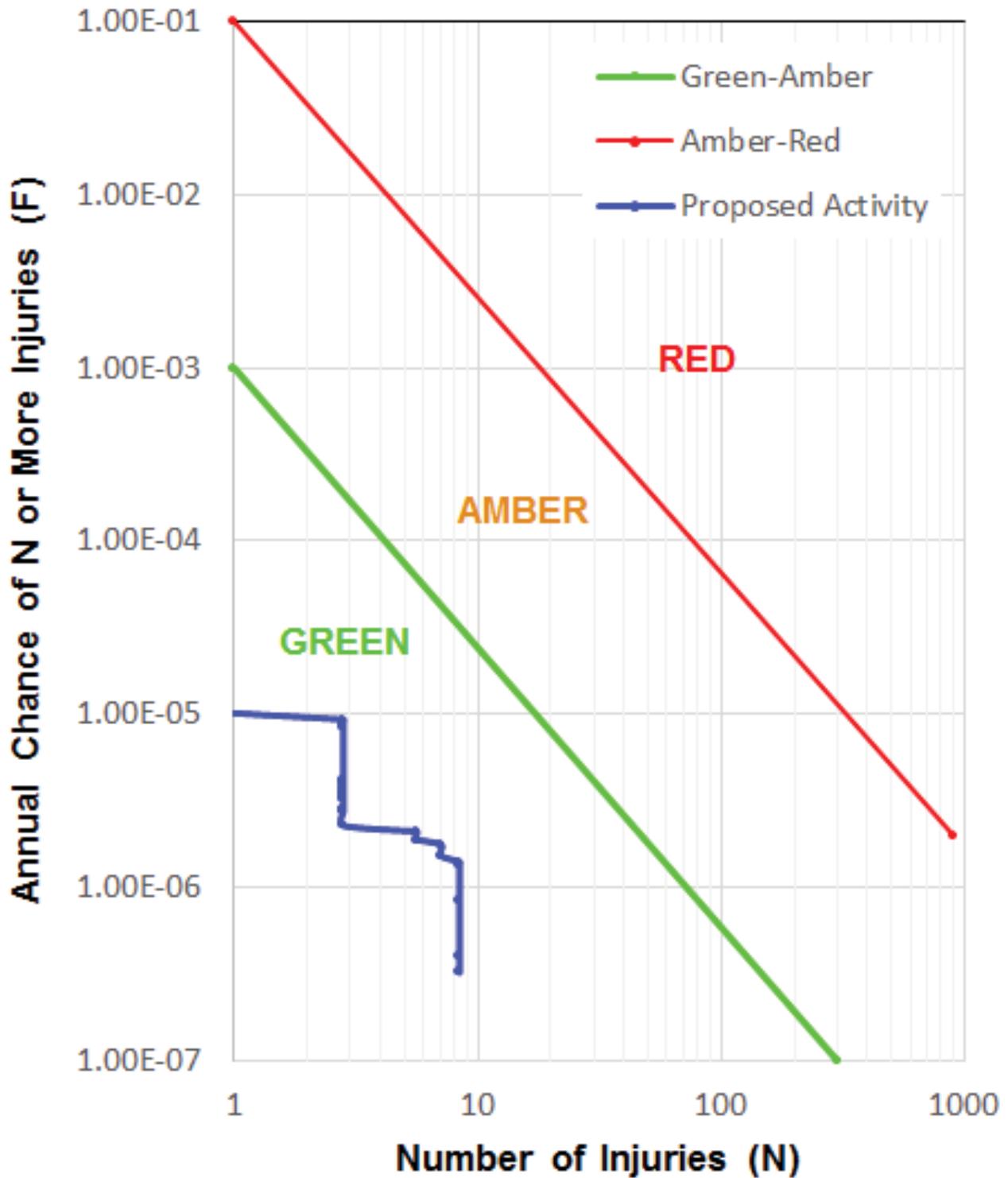
Injuries	Accident Probability in Segment	Combined Probability
0	4.39E-07	2.24E-05
0	7.85E-07	2.32E-05
0	4.84E-07	2.37E-05
0	4.49E-07	2.41E-05
0	1.58E-07	2.43E-05
0	1.30E-05	3.73E-05
0	7.30E-08	3.73E-05
0	8.75E-07	3.82E-05
0	7.30E-07	3.90E-05
0	7.30E-07	3.97E-05
0	1.42E-07	3.98E-05
0	9.62E-08	3.99E-05
0	1.87E-06	4.18E-05
0	6.66E-08	4.19E-05
0	2.79E-06	4.46E-05
0	2.25E-06	4.69E-05
0	1.28E-07	4.70E-05
0	3.92E-06	5.09E-05
0	1.70E-07	5.11E-05
0	3.89E-07	5.15E-05
0	8.27E-07	5.23E-05
0	6.81E-07	5.30E-05
0	1.73E-06	5.47E-05
0	1.41E-06	5.61E-05
0	2.05E-06	5.82E-05
0	1.15E-07	5.83E-05
0	2.27E-06	6.06E-05
0	1.64E-07	6.07E-05
0	2.46E-06	6.32E-05
0	1.16E-07	6.33E-05
0	2.21E-06	6.55E-05
0	5.35E-07	6.61E-05
0	1.95E-07	6.63E-05
0	2.72E-06	6.90E-05
0	4.25E-07	6.94E-05
0	2.89E-07	6.97E-05
0	5.61E-06	7.53E-05
0	2.00E-07	7.55E-05
0	8.36E-06	8.39E-05
0	6.74E-06	9.06E-05
0	3.84E-07	9.10E-05
0	1.17E-05	1.03E-04
0	5.11E-07	1.03E-04
0	1.17E-06	1.04E-04
0	2.48E-06	1.07E-04
0	2.04E-06	1.09E-04
0	5.18E-06	1.14E-04
0	4.23E-06	1.18E-04
0	3.48E-07	1.19E-04
0	6.64E-06	1.25E-04
0	1.60E-06	1.27E-04
0	5.84E-07	1.28E-04
0	8.17E-06	1.36E-04

Fatalities	Accident Probability in Segment	Combined Probability
0	4.39E-07	2.24E-05
0	7.85E-07	2.32E-05
0	4.84E-07	2.37E-05
0	4.49E-07	2.41E-05
0	1.58E-07	2.43E-05
0	1.30E-05	3.73E-05
0	7.30E-08	3.73E-05
0	8.75E-07	3.82E-05
0	7.30E-07	3.90E-05
0	7.30E-07	3.97E-05
0	1.42E-07	3.98E-05
0	9.62E-08	3.99E-05
0	1.87E-06	4.18E-05
0	6.66E-08	4.19E-05
0	2.79E-06	4.46E-05
0	2.25E-06	4.69E-05
0	1.28E-07	4.70E-05
0	3.92E-06	5.09E-05
0	1.70E-07	5.11E-05
0	3.89E-07	5.15E-05
0	8.27E-07	5.23E-05
0	6.81E-07	5.30E-05
0	1.73E-06	5.47E-05
0	1.41E-06	5.61E-05
0	2.05E-06	5.82E-05
0	1.15E-07	5.83E-05
0	2.27E-06	6.06E-05
0	1.64E-07	6.07E-05
0	2.46E-06	6.32E-05
0	1.16E-07	6.33E-05
0	2.21E-06	6.55E-05
0	5.35E-07	6.61E-05
0	1.95E-07	6.63E-05
0	2.72E-06	6.90E-05
0	4.25E-07	6.94E-05
0	2.89E-07	6.97E-05
0	5.61E-06	7.53E-05
0	2.00E-07	7.55E-05
0	8.36E-06	8.39E-05
0	6.74E-06	9.06E-05
0	3.84E-07	9.10E-05
0	1.17E-05	1.03E-04
0	5.11E-07	1.03E-04
0	1.17E-06	1.04E-04
0	2.48E-06	1.07E-04
0	2.04E-06	1.09E-04
0	5.18E-06	1.14E-04
0	4.23E-06	1.18E-04
0	3.48E-07	1.19E-04
0	6.64E-06	1.25E-04
0	1.60E-06	1.27E-04
0	5.84E-07	1.28E-04
0	8.17E-06	1.36E-04

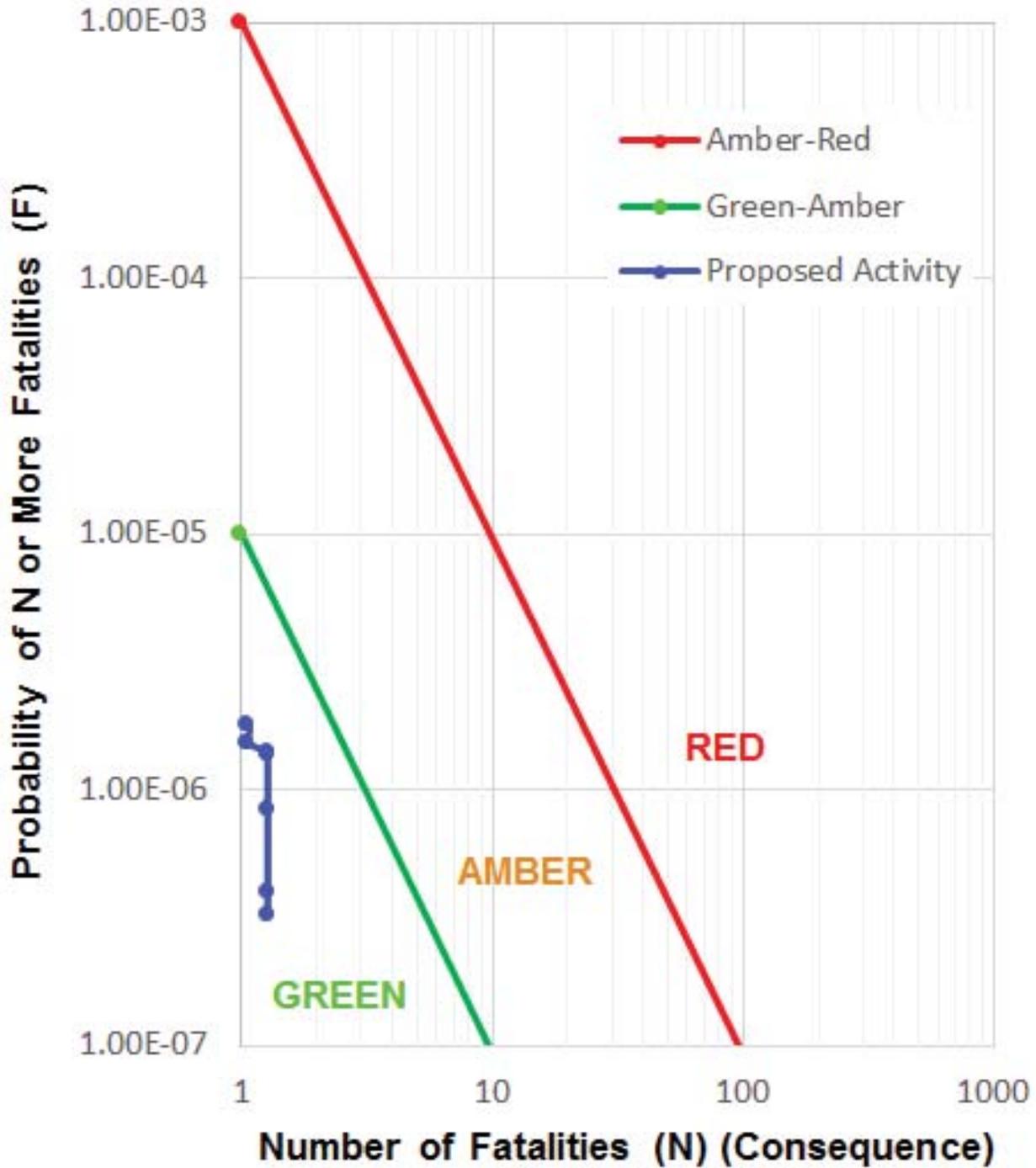
APPENDIX 4

**PROPOSED PRODUCT TRUCKING PUBLIC INJURY AND
FATALITY F-N CURVES**

LFC Product Trucking Public Injury F-N Curve



LFC Product Trucking Public Fatality F-N Curve



ATTACHMENT C.3
LFC LOADING INCREMENTAL RISK ANALYSIS



LFC Truck Loading Industrial Risk Analysis (IRA) in support of Emergency Permit Application for Emergency Trucking Activity to De-inventory LFC Crude Storage Tanks

Date: January 2016

Prepared by:

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TABLE OF CONTENTS

1.0	Introduction.....	1
2.0	Description of the Proposed LFC Crude Oil Truck Loading.....	2
3.0	Loading Risk Assessment Methodology	3
3.1	Hazards Identification.....	3
3.2	Existing and Proposed Safety Measures and Environmental Controls	3
3.3	Probability and Consequence Analysis	4
3.4	Safety Risks	5
4.0	Probability and Consequence Analysis	6
5.0	Conclusions	6
6.0	References	6

APPENDICES

Appendix 1	Truck Loading Schematic
Appendix 2	LFC Truck Loading Site Plan
Appendix 3	Truck Routing within LFC TT
Appendix 4	Risk Calculation Details
Appendix 5	U.S. Department of Transportation Risk Matrix
Appendix 6	Proposed Product Loading Risk Matrix

LFC Truck Loading Industrial Risk Analysis (IRA) in Support of ExxonMobil's Emergency Permit Application for Emergency Trucking Activity to De-inventory LFC Crude Storage Tanks

1.0 Introduction

This truck loading industrial risk analysis (IRA) estimates the potential safety risks associated with the proposed emergency crude oil (product) trucking activities at ExxonMobil's Las Flores Canyon (LFC) facility.

Based on the IRA evaluation, most of the hazards that could occur from the proposed truck loading activity within LFC are considered unlikely. Those activities that are considered to have moderate risk would result in negligible consequences. Therefore, the risk impacts within LFC from the proposed truck loading activities are less than significant.

Due to the shutdown of Line 901 operated by Plains All American Pipeline Company (PAAPL), the only way to remove (de-inventory) the product stored in the LFC Crude Storage Tanks is via temporary trucking. Temporary LFC truck loading facilities are proposed to be installed at the Transportation Terminal (TT) for this purpose. LFC contains industrial facilities that are not accessible to the public; therefore, there is a very low likelihood of public exposure to any hazards that occur within the LFC boundaries during product truck loading activities. This IRA addresses potential industrial safety risks, such as the risk of an oil spill, during the proposed loading activities.

It should be noted that the destination unloading facilities (i.e., Phillips 66 Station in Santa Maria and Pentland PAAPL station in Maricopa) are designed for truck unloading and already unload many trucks from various vendors each day. Trucks with ExxonMobil product are proposed to be received and unloaded within permitted and design capacities of the designated unloading facilities. Thus, there is no change in the unloading facilities operations and no increase in risk will result from the proposed unloading of ExxonMobil product at these designated unloading facilities. Therefore, Management of Change (MOC) or Process Hazards Analysis (PHA) are not warranted for the unloading facilities.

Santa Barbara County does not have safety criteria for risks within facilities that do not result in impacts to public. This IRA was prepared in accordance with typical safety evaluations at industrial facilities that evaluate severity of consequences versus likelihood of occurrence of a hazard [Refs. 1 and 2].

Safety risks were estimated using the probabilities (annual chance of occurrence) of an equipment failure, truck transportation incident and operator error based on the reference data widely used for such process hazard evaluations and compared to the commonly used risk criteria [Refs 3, 4, 5 and 6].

2.0 Description of the Proposed LFC Crude Oil Truck Loading

Proposed truck loading of product at LFC would occur at the Transportation Terminal (TT). Appendix 1 includes a Truck Loading Schematic showing the proposed truck loading facilities. The LFC truck loading area and proposed facility modifications, as well as contingencies against spills are shown in Appendix 2. Appendix 3 shows an aerial view of the truck routing within the LFC TT.

An empty truck will arrive at LFC, be weighed at the LFC weigh scales, and proceed to one of the two loading stations via the route shown in Attachment 3. The truck wheels will be chocked. The truck will undergo a safety inspection by the ExxonMobil operator on duty. The loading hose and vapor recovery hose will be connected to the truck. The ExxonMobil operator will open the vapor recovery system (VRS) valve, and the oil line valve to start loading. Loading will occur from the LFC Crude Storage Tanks. Loading will be attended by the ExxonMobil operator and the truck loading operator (driver) at all times. The product level in the truck will be continuously monitored via a gauge. Once full, the oil and vapor recovery line valves will be closed, the hoses will be disconnected and the truck will leave the TT area, be weighed and then leave LFC to proceed to one of the unloading facilities.

Product truck loading is proposed as described in Table 1 below.

Table 1 Truck Loading Details

Parameter	Value
Maximum number of trucks	30 trucks per day
Maximum volume loaded per truck	160 barrels (bbls) (worst case scenario for a single truck spill)
Total number of trucks	2,800 (worst case scenario for the number of trucks)
Maximum transportation duration	Up to 6 months (180 days) from start
Volume of oil transported	Approx. 425,000 bbl. (de-inventory two LFC Crude Storage Tanks)

The loading equipment consists of the following parts:

- Product transfer line and connections to the two loading stations
- Vapor recovery line and connections to the two loading stations
- Hoses to connect to the trucks; hoses equipped with dry-lock connectors.

3.0 Loading Risk Assessment Methodology

The LFC Truck Loading IRA evaluated risks using the following steps:

1. Potential hazards identification
2. Existing and proposed safety and environmental controls to reduce hazards
3. Probability and consequence analysis
4. Safety risks analysis.

3.1 Hazards Identification

Hazards from the proposed product truck loading at the LFC could occur from equipment failure, operator error, or both. In order for a spill to result in a significant consequence, both equipment failure and operator error would need to occur. An onsite truck road accident that compromises the loaded truck tank also introduces a risk that could lead to a spill or potentially injury or fatality of the truck driver or LFC personnel due to the impact with another vehicle or object.

Potential scenarios that lead to a hazard or product spill from the proposed loading include the following:

1. New piping, valve or connection leak or rupture (assume that the piping is always filled with product).
2. An operator error that results in improper hose connection and an operator error that opens the valve to allow product into the hose. Both operator errors must occur in order for a spill to occur.
3. Accidental hose disconnect during loading and failure to close the loading valve.
4. A hole in the hose and failure to inspect before loading and failure to shut off loading valve.
5. Catastrophic hose rupture during loading and failure to close loading valve.
6. An onsite truck accident (impact with another vehicle or object).

3.2 Existing and Proposed Safety Measures and Environmental Controls

The loading schematic is shown in Attachment 1. As shown, there will be two loading stations where two trucks can load simultaneously.

The loading area will be protected from spills and fire with the following containment and safety measures, see Attachment 2:

- The berms and containment area to the southwest of the loading location
- Existing grading sloped to the low point within the existing bermed area – southwest of the loading locations: “Berm Low Point”
- Existing “Containment Road Bump” on the road south of the loading locations designed to divert any spills from the road into secondary containment to the west of the “Bump”

- Existing spill containment and absorption materials stored within 50 yards of the loading location
- Proposed “Plug drainage culvert” that could serve as a conduit for any spilled oil
- Proposed containment container under truck product hose connection to capture any leakage when hoses disconnected
- Two fire hydrants and fire monitor (converted from a hydrant)
- ExxonMobil loading operator will be always present during loading activities
- Truck driver will also be present during the loading activities
- Truck drivers and loading operators will be trained on the specific loading procedures
- ExxonMobil operator will have access to the valve shut off for the loading line
- LFC facility has spill response equipment onsite
- LFC facility has a spill response plan.

3.3 Probability and Consequence Analysis

The probability of each of the above-mentioned hazards occurring was estimated as follows:

- Nominal failure rates [Ref. 7] were considered per Table 2 below.
- Probabilities of the events that need to occur at the same time in order for a spill to occur were multiplied.
- Probabilities of events that can lead to a spill if occurring independently were added together.

Probabilities of events that would result in a small leak were not estimated (e.g., a small hole in a transfer hose, small leak in hose connection, etc.), because these scenarios would result in a negligible consequence that could be quickly remedied by onsite trained personnel and within a facility designed to prevent and contain spills.

Table 2 Failure Types and Their Probabilities [Ref. 3, 5 and 7]

Type of Failure	Nominal Failure Rate Failures per year of operation
Truck Transfer: Rupture of transfer arm	3×10^{-4} per transfer arm [Ref. 7]
Truck Transfer: Rupture of transfer hose	4×10^{-2} per transfer hose [Ref. 7]
Piping (General): Rupture at valve	9×10^{-6} per valve [Ref. 7]
Piping (General): Failure of gasket	3×10^{-2} per gasket [Ref. 7]
Piping: 150-mm (6-inch) $\leq d <$ 299-mm (12-inch) catastrophic rupture	2×10^{-7} per meter of piping [Ref. 7]
Procedure failure (operator error)	5.5×10^{-2} per operation [Ref. 7]
Incorrect hose coupling	4.4×10^{-3} per operation [Ref. 7]
Truck accidents	0.2 per million miles [Ref. 3]
Spills from a truck after an accident	20% of the accident rate
Large spill as percentage from all truck spills	25% (reasonable assumption)
Ignition of a spilled pool as percentage of all spills	2% [Ref. 5]

Table 3 Failure Types and Their Consequence

Type of Failure	Worst Case Spill
Rupture or leak of transfer arm or hose	Several barrels. Spill will be stopped when the operator identifies event and shuts off the valve that allows product flow into the hose. Contained onsite.
Rupture at the new oil piping valve or connection	Several barrels. Spill will be stopped when the operator identifies event and shuts off the valve that allows product flow into the piping. Contained onsite.
Incorrect hose coupling	Several barrels. Spill will be stopped when the operator identifies event and shuts off the valve that allows product flow into the hose. Contained onsite.
Hose disconnect	Several barrels. Spill will be stopped when the operator identifies event and shuts off the valve that allows product flow into the hose. Contained onsite. (The trucks are equipped with a check valve that would not allow back flow from the filled truck if the loading hose accidentally disconnects.)
Full tanker truck failure	160 bbls – full truck contents

Consequences from piping or hose ruptures or leaks would result in a product spill with the maximum volume of 160 bbls (full truck contents). The calculation details of the probabilities are provided in Appendix 4; as shown, product spill incidents from the proposed loading are unlikely. Ignition of spilled product is valued at 2% of spills, thus a fire hazard scenario is even less likely.

3.4 Safety Risks

Safety risks are based on the estimated probabilities (chance of occurrence) and consequences (serious injury or fatality) of the evaluated incident scenarios. The estimated risks were compared to the U.S. Department of Transportation's Risk Matrix [Ref. 2 and 3] (see Appendix 5) to determine if adverse impacts from the proposed product transportation are potentially significant.

Class I – High probability and severe consequence events

Class II – High probability or severe consequence events

Class III – Low probability and negligible consequence events.

4.0 Probability and Consequence Analysis

The details of hazard scenarios probabilities calculations are presented in Appendix 4. Proposed product loading probability and consequence values were entered into a Risk Matrix, see Appendix 6.

5.0 Conclusions

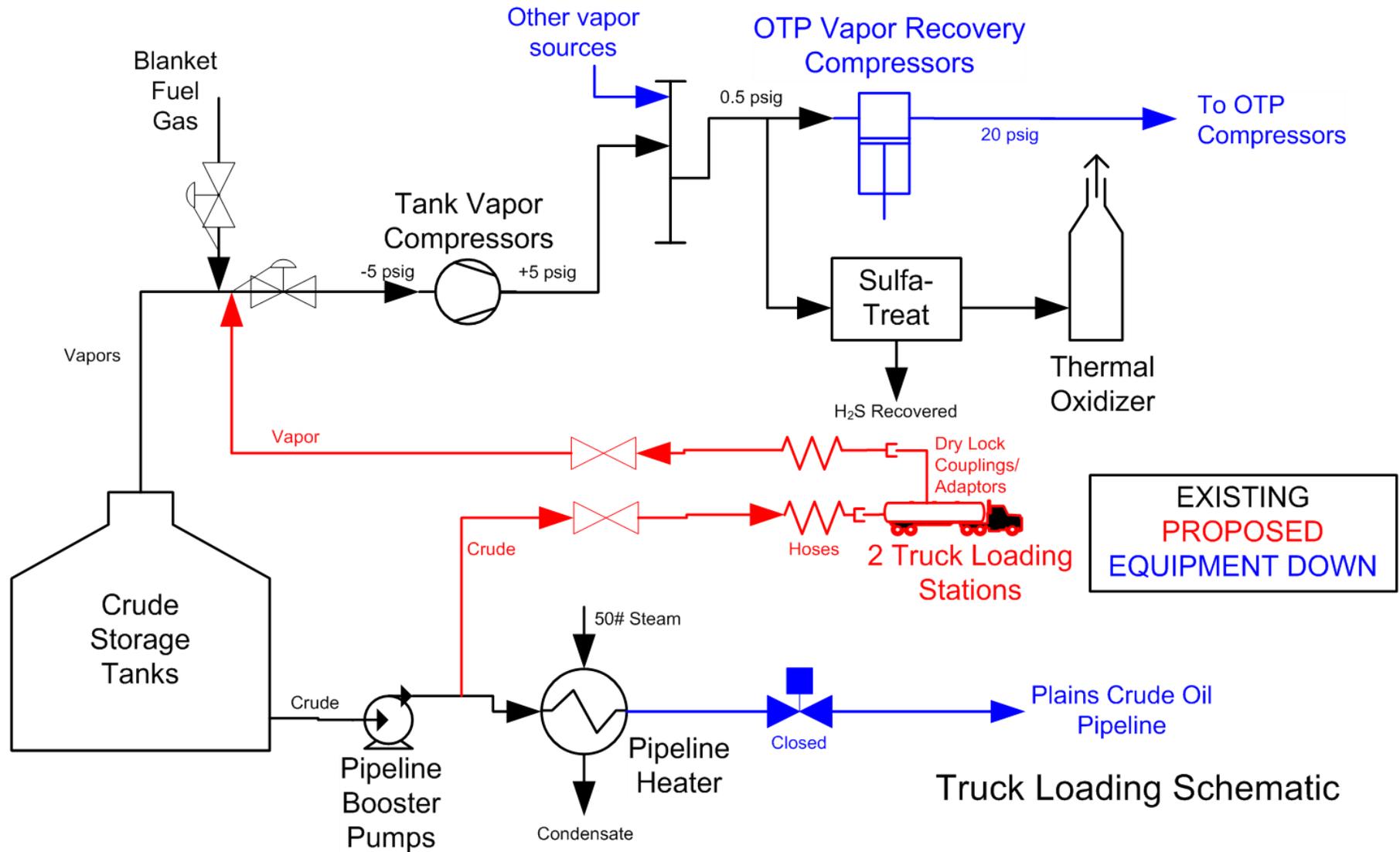
As shown on the Risk Matrix in Appendix 6, most of the hazards that could occur from the proposed truck loading activity within LFC are considered unlikely. Those activities that are considered to have moderate risk would result in negligible consequences. Therefore, the risk impacts within LFC from the proposed truck loading activities are less than significant.

6.0 References

1. <http://www.cgerisk.com/knowledge-base/risk-assessment/risk-matrices> CGI Risk Matrix
2. https://www.fhwa.dot.gov/ipd/pdfs/p3/p3_guidebook_risk_assessment_030314.pdf
Department of Transportation Risk Matrix
3. Harwood, et. al., *Procedure for Developing Truck Accident and Release Rates for Hazardous Materials Routing*, Journal of Transportation Engineering, Vol 119, No. 2, March/April 1993.
4. Marine Research Specialists (MRS), *Nuevo LPG Transportation Risk Assessment Final Draft Report*, MRS, Ventura, CA March 2004.
5. Golder Associates, *Chevron San Ardo to Coalinga Heated Crude Oil Pipeline Risk Assessment Final Report*, Golder Associates, Inc., Roseville, CA, September 2007.
6. FEMA, USDOT, and USEPA, *Handbook of Chemical Hazard Analysis Procedures*, Washington D.C.
7. Department of Transportation (DOT) and PHIMSA, *Nominal Failure Rates*, Feb 2015.
<https://primis.phmsa.dot.gov/Ing/docs/Failure%20Rate%20Table%201.pdf>

APPENDIX 1

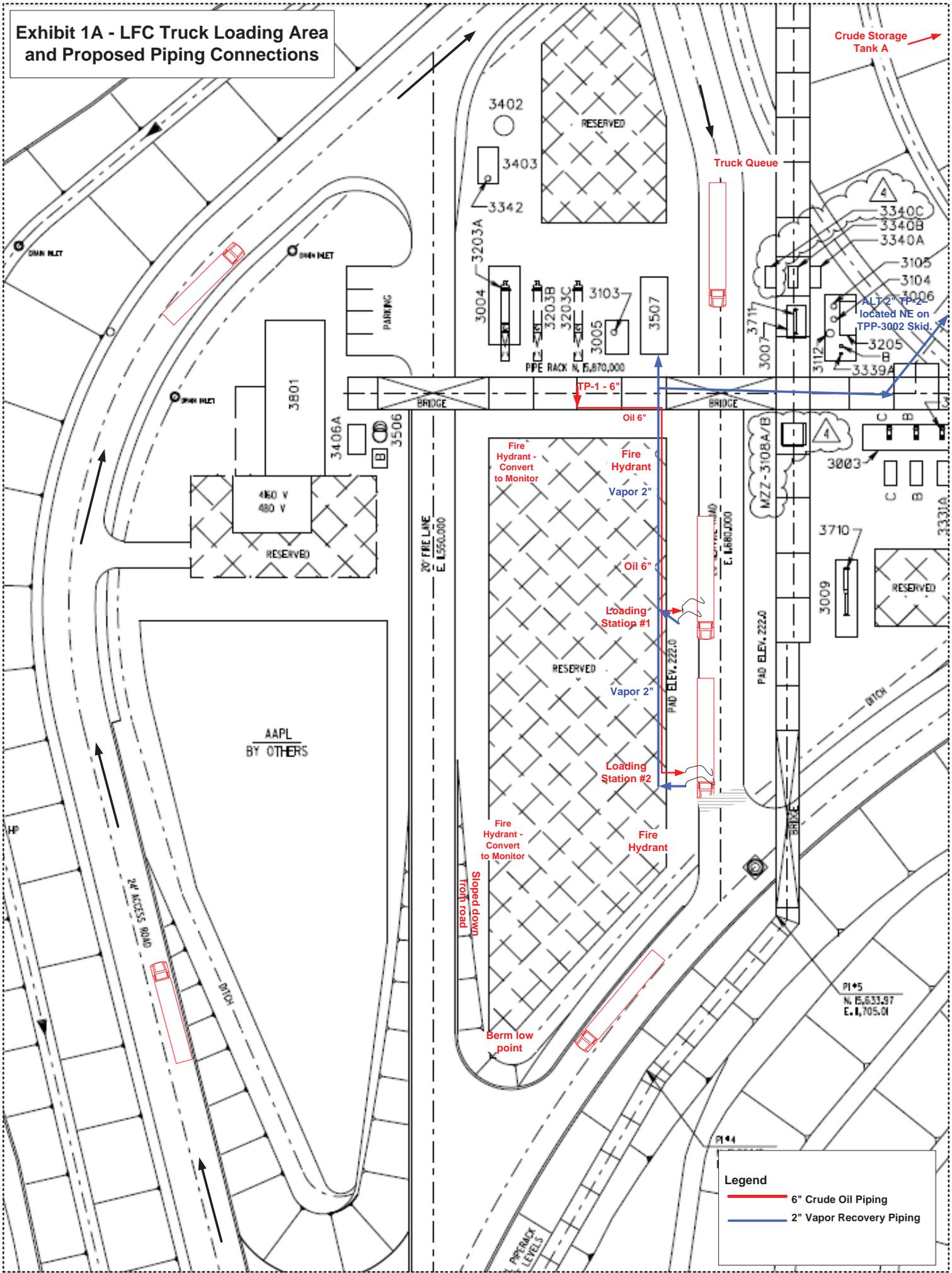
TRUCK LOADING SCHEMATIC



APPENDIX 2

LFC TRUCK LOADING SITE PLAN

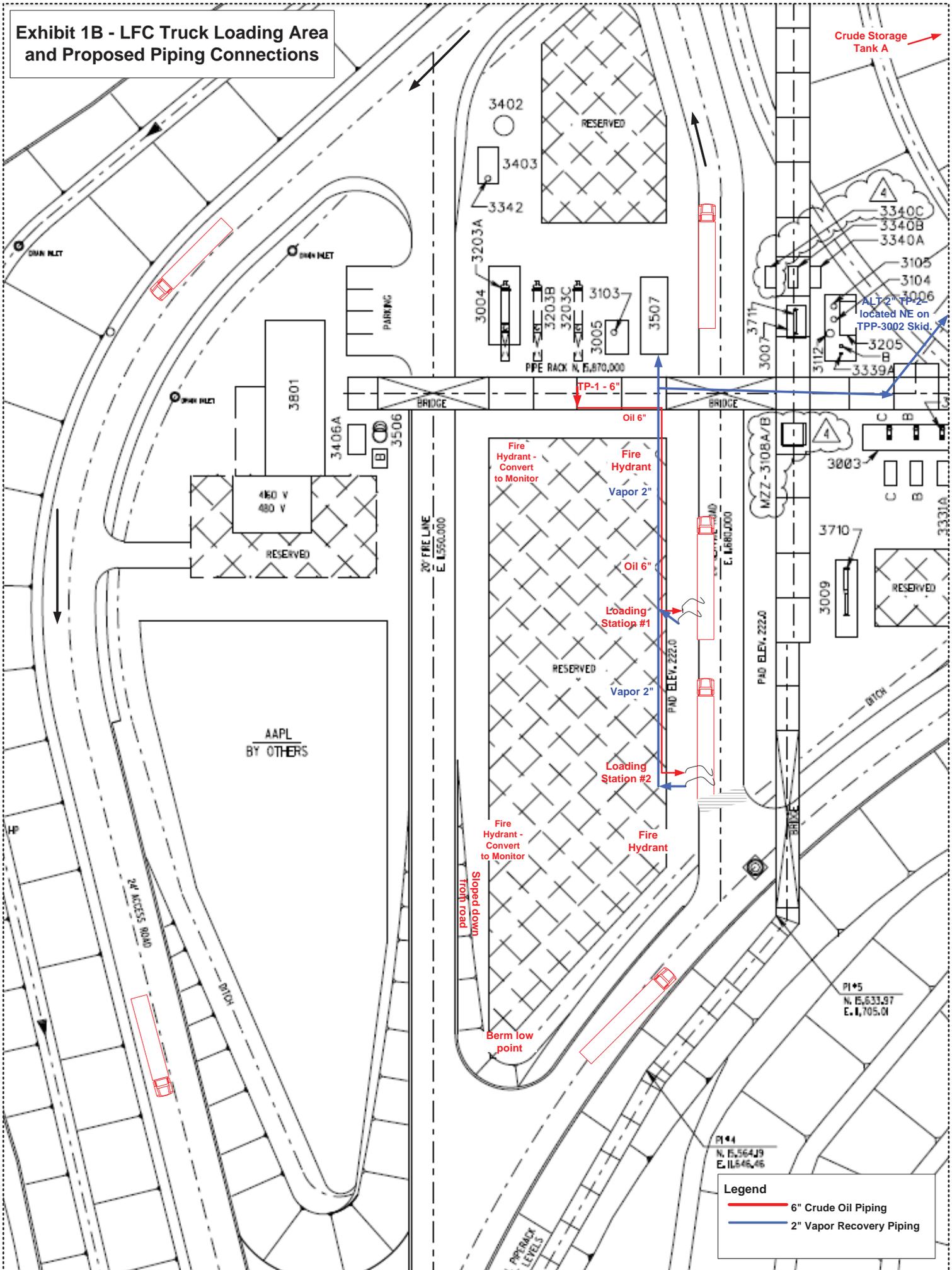
Exhibit 1A - LFC Truck Loading Area and Proposed Piping Connections



Legend

- 6" Crude Oil Piping
- 2" Vapor Recovery Piping

Exhibit 1B - LFC Truck Loading Area and Proposed Piping Connections



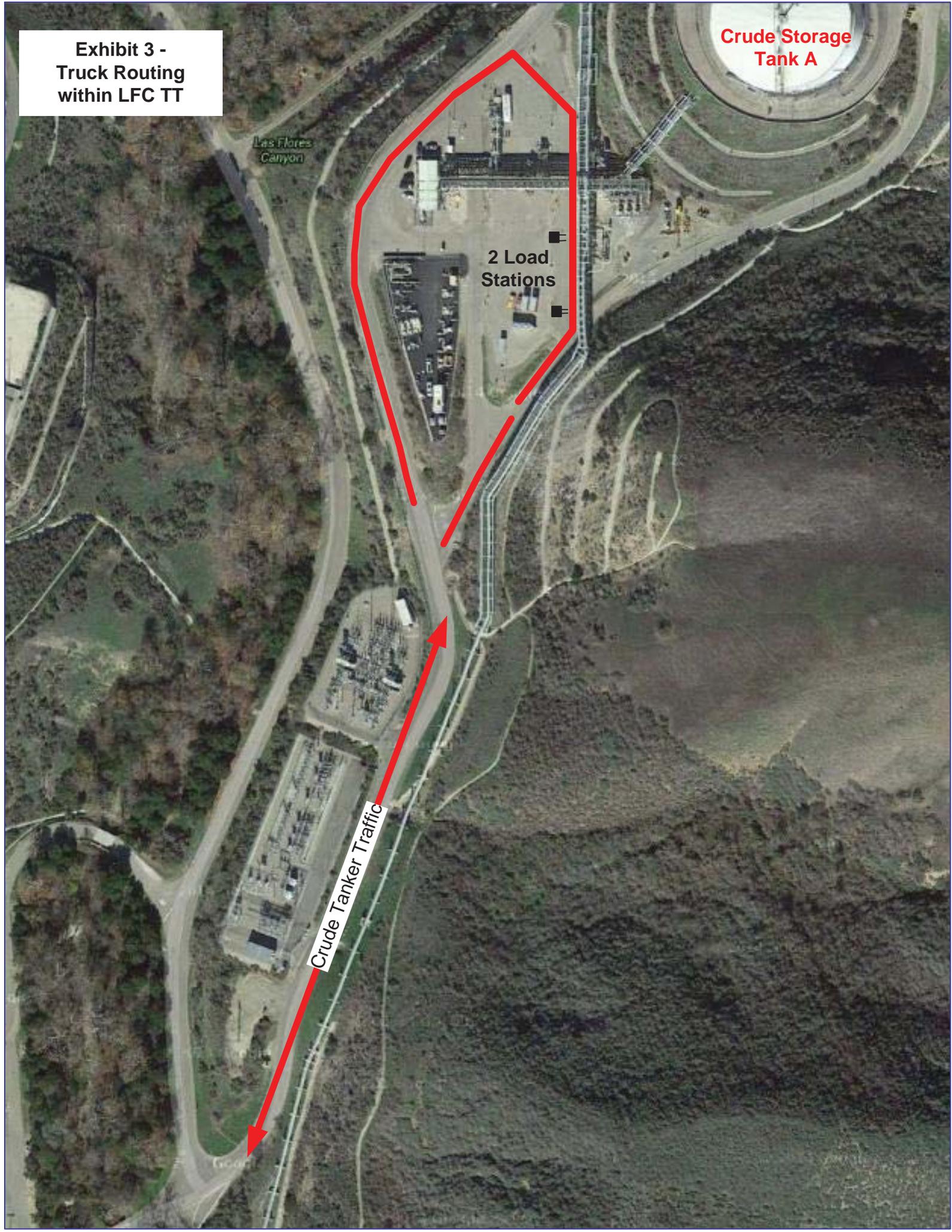
Legend

- 6" Crude Oil Piping
- 2" Vapor Recovery Piping

APPENDIX 3

TRUCK ROUTING WITHIN LFC TT

**Exhibit 3 -
Truck Routing
within LFC TT**



**Crude Storage
Tank A**

Las Flores
Canyon

**2 Load
Stations**

Crude Tanker Traffic

LFC Rd

APPENDIX 4

RISK CALCULATION DETAILS

Incremental Risk - Proposed Truck Loading: Calculations

Number	Event	Failure rate or probability	Units	Number	Event rate or probability	Reference	Total rate	Value per years
Scenario 1a Release of Crude Oil and Subsequent Fire							8.69E-11	11,514,104,778
1a1	Tanker Truck accident (1 mile within LFC)	1.93E-07	/mile/yr	1	1.93E-07	see QRA for this project		Occurs every X year
1a2	Probability of a release	9.00E-02	/accident	1	9.00E-02	see QRA for this project		
1a3	Full load spill (160 bbls)	2.50E-01	/accident	1	2.50E-01	see QRA for this project		
1a4	Probability of ignition	2.00E-02	/spill	1	2.00E-02	see QRA for this project		
Scenario 1b Release of Crude Oil, no fire							4.34E-09	230,282,096
1a1	Tanker Truck accident (1 mile within LFC)	1.93E-07	/mile/yr	1	1.93E-07	see QRA for this project		Occurs every X year
1a2	Probability of a release	9.00E-02	/accident	1	9.00E-02	see QRA for this project		
1a3	Full load spill (160 bbls)	2.50E-01	/accident	1	2.50E-01	see QRA for this project		
Scenario 2 Spill from oil loading - Piping							2.08E-02	48
2a1	Hole in pipe	2.83E-05	/miles/yr	0.095	2.68E-06			Occurs every X year
2a2	Leak at valve	5.54E-04	/valve.yr	6	3.33E-03	Assume 90% of leaks are significant but not catastrophic		
2a3	Rupture of small threaded connection	2.08E-05	/conn.yr	20	4.17E-04	CCPS with correction for annual fugitive I&M program, 10% ruptures		
2a4	Rupture of small welded connection	2.63E-06	/conn.yr	20	5.26E-05	WASH 1400, weld leaks, 10% to rupture		
2a5	Pump leak	1.70E-02	/yr	1	1.70E-02	HLID, leakage, 10% to rupture		
Scenario 3 Spill from oil loading - Hose							7.39E-01	1
2a6	Hole in loading hose	4.00E-04	/operation	1	4.00E-04	Shell rupture per operation. Leaks assumed to be 10 times greater probability.		Occurs every X year
2a7	Incorrect hose coupling	4.40E-03	/operation	1	4.40E-03	Rijnmond 1982		
2a8	Failure to Close valve (operator error)	5.50E-02	/operation	1	5.50E-02	Rijnmond 1982, failure to follow instructions		
2a9	Loading operations	2800	Operations	1	2.80E+03	Number of annual loading		

Notes

Piping Failure Rate: Rupture
Piping Failure Rate: Leak

4.50E-07 Average between WASH, Rijnmond, Lees and CCPS
2.83E-05 Average between WASH, Rijnmond, Lees and CCPS

Data - Worst possible case (not based on the Air Quality Permit data)

Length of new piping (max) 500 feet
Number of connections 30
Number of Valves 10

References

1. Rijnmond, 1982. Risk Analysis of Six Potentially Hazardous Industrial Objects in the Rijnmond Area, A Pilot Study
2. CCPS, 1989. Guidelines for Process Equipment Reliability Data, with Data Tables
3. WASH-1400. Reactor and Safety Study. 1975 (mechanical and human failure rates)
4. Lee's Loss Prevention in the Process Industries. 2005

APPENDIX 5

U.S. DEPARTMENT OF TRANSPORTATION RISK MATRIX

Risk Assessment Matrix - Risk Prioritization = Severity vs. Likelihood

Severity Table

#	Severity level	Workplace Safety	Workplace Health	Environment	Fire Damage
5	Critical	Fatality, single or multiple, permanent body injury	Acute Poisoning, Failure of Major Bodily Functions	Large Spills >1000 bbls to Sensitive Resources	More Than \$10 million damages
4	Very Serious	Injury requiring 30 days of hospitalization and/or medical leave	Moderate exposure, Reversible injury to Bodily Functions on prolong recovery	Large Spills >1000 bbls to offsite locations, no sensitive resources impacted	More Than \$1 million damages
3	Serious	Injury requiring 10 days of hospitalization and/or medical leave	Mild exposure, Reversible injury to Bodily Functions with less than 30 days recovery	Large Spills >1000 bbls outside containment within facility	More Than \$100k damages
2	Marginal	Injury requiring maximum of 3 days of medical leave only	Very Mild exposure, Reversible injury to Bodily Functions with less than 3 days recovery	Medium spills 100-200 bbls within facility outside containment	More Than \$10k damages
1	Negligible	First aid treatment only, no significant downtime	Very Mild exposure, Reversible injury to Bodily Functions with less than 3 days recovery	Spills inside containment	Less than \$5k damages

Likelihood Table

#	Likelihood Level	Likelihood of Occurrence / Exposure Criteria
5	Frequent	Likely to occur many times per year
4	Moderate	Likely to occur once per year
3	Occasional	Might occur once in three years
2	Remote	Might occur once in five years
1	Unlikely	Might occur once in ten years

Risk Level Matrix

		SEVERITY				
		Critical (5)	Very Serious (4)	Serious (3)	Marginal (2)	Negligible (1)
LIKELIHOOD	Frequent (5)	25 Not permissible	20 Not permissible	15 High priority	10 Review at appropriate time	5 Risk acceptable
	Moderate (4)	20 Not permissible	16 Not permissible	12 High priority	8 Review at appropriate time	4 Risk acceptable
	Occasional (3)	15 High priority	12 High priority	9 Review at appropriate time	6 Risk acceptable	3 Risk acceptable
	Remote (2)	10 Review at appropriate time	8 Review at appropriate time	6 Risk acceptable	4 Risk acceptable	2 Risk acceptable
	Unlikely (1)	5 Risk acceptable	4 Risk acceptable	3 Risk acceptable	2 Risk acceptable	1 Risk acceptable

APPENDIX 6

PROPOSED PRODUCT LOADING RISK MATRIX

Risk Level Matrix

		SEVERITY				
		Critical (5)	Very Serious (4)	Serious (3)	Marginal (2)	Negligible (1)
LIKELIHOOD	Frequent (5)					
	Moderate (4)					- Hose rupture or leak - Hose disconnect
	Occasional (3)					
	Remote (2)					
	Unlikely (1)			- Truck accident with a full tank spill	- Truck accident with a leak	- Piping or valve rupture

Risk Classification

Unacceptable	High Priority	Low Priority	Acceptable Risk
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ATTACHMENT C.4
CRUDE OIL TRANSPORTATION RISK MANAGEMENT AND
PREVENTION PROGRAM (CO-TRMPP)

EXXONMOBIL – SANTA YNEZ UNIT EMERGENCY TRUCKING ACTIVITY TO DE-INVENTORY LFC CRUDE STORAGE TANKS CRUDE OIL TRANSPORTATION RISK MANAGEMENT AND PREVENTION PROGRAM (CO-TRMPP)

1.0 Introduction and Objective

ExxonMobil's Santa Ynez Unit Facility (SYU) was permitted and started up in 1993. Since that time, all crude oil export has occurred via the Plains All American Pipeline Line 901 (PAAPL) which is connected to the LFC facilities at the LFC Transportation Terminal. In May 2015, the PAAPL experienced an incident where a failure in Line 901 resulted in the shutdown of the pipeline that SYU has utilized to transport crude to refineries. Recently it was determined that the subsequent pipeline repairs will prevent the pipeline from returning to active service for a number of months, if not years. During that time the LFC facility can no longer quickly empty the LFC Crude Storage Tanks (~425,000 Barrels) in response to a natural disaster or unforeseen circumstance.

ExxonMobil is requesting approval of an Emergency Permit for a temporary trucking activity to de-inventory (empty) the Crude Storage Tanks from the Santa Ynez Unit (SYU) facility located in Las Flores Canyon (LFC). The proposed activity would utilize crude tanker trucks (trucks) to de-inventory product currently stored in the two Crude Storage Tanks in LFC (Tank A and Tank B) over a three to six month period. While ExxonMobil believes the project transfers could be completed over a 12-to-16 week period, potential impacts from operational issues could increase the time to completely empty the LFC Crude Storage Tanks. ExxonMobil will monitor road conditions and delay truck transport should road conditions present hazards, including flooding and ice.

Minimal facility modifications to include extension of existing piping and possible LACT units would be installed to allow loading of up to two trucks at an existing disturbed portion of the LFC Transportation Terminal (TT). A limit of no more than thirty trucks per day would transport product from LFC to either of two offsite locations, one in Santa Barbara County (P66 Truck Rack in Santa Maria) and one in Kern County (Plains All American Truck Rack in Pentland). All transportation will be limited to State Highway 101; no truck traffic will be directed through State Highway 154.

These unloading facilities are currently permitted to handle this type of truck unloading and have the equipment and capacity to accommodate the expected number of trucks for the proposed activity. Truck loading and transportation would occur seven days a week and 24-hours per day. After unloading at one of the two designated facilities, the trucks may return directly back to LFC to reload or may be reassigned to other operations.

This Crude Oil Transportation Risk Management and Prevention Program (CO-TRMPP) has been developed to ensure that this temporary trucking activity is conducted in a safe and efficient manner.

2.0 Elements of the CO-TRMPP

The CO-TRMPP shall apply to any and all highway shipments of product from ExxonMobil's SYU facility in Las Flores Canyon to the regional receiving locations.

Product carriers shall be required to complete the "Crude Oil - Motor Carrier Safety Survey" (Exhibit A) prior to starting shipments from LFC. LFC Operations personnel will verify that each carrier meets or exceeds the safety standards. LFC Operations personnel will also confirm the safety and operability of trucks prior to loading and prior to transport from LFC. Any truck that receives an unsatisfactory inspection will no longer be permitted to transport product until the issue has been corrected.

LFC Operations will also develop a procedure for the trucks to follow during the loading activity. If, based on ExxonMobil operator observations, the carrier's actual performance in loading at LFC is inconsistent with the Safety Survey, or the procedure, ExxonMobil will re-evaluate the carrier's ability to safely load and haul product. If the issues cannot be resolved to demonstrate the carrier's ability to safely load and haul product, use of that carrier will be discontinued until they successfully satisfy ExxonMobil's requirements.

There are no specific, pre-established criteria for terminating use of a carrier insofar as there are potentially many different situations in which ExxonMobil may decide to take such action. For the most part, this decision will be based on operational and technical judgment made by LFC operating and engineering personnel after reviewing the facts of the situation at that time. In general, any human or mechanical issues that pose the potential to compromise safe operations will be cause for discontinuing use of any carrier until such issues are resolved to ExxonMobil's satisfaction.

An ExxonMobil operator will be present during the truck loading activity. Prior to commencing the proposed trucking activity, the operators will be trained in loading operations and what to inspect using the developed procedure and checklist. The operator will advise his or her supervisor if there is an issue with the truck or driver. If an issue is observed prior to loading, the truck will not be loaded and the carrier's dispatcher will be notified to correct the issue before the truck will be loaded or to send another truck. If an issue is discovered after a truck is loaded (e.g. overload, leak), the driver will be instructed not to leave LFC until the issue is corrected.

ExxonMobil will include provisions in its contracts with each carrier to require all trucks hauling 100 miles or more one-way to have vehicle speed-monitoring satisfactory to ExxonMobil. ExxonMobil will also require all carriers to have a working cellular phone aboard each vehicle involved in the proposed trucking activity.

All trucks involved in this activity will observe a curfew when travelling on Calle Real. Truck traffic will not travel on Calle Real between El Capitan exit and Refugio exit during the hours of 7:45 am to 8:30 am and 2:55 pm to 3:40 pm. This restriction only applies when the school is in regular operation and students are being bussed.

EXHIBIT A
Crude Oil- Motor Carrier Safety Survey
Santa Ynez Unit Facility

General Information

Interview Location _____

Carrier Personnel Interviewed _____

Date of Interview _____

Equipment: No. of tractors owned by Company/Operator _____

Replacement Policy for Tractors _____

No. of trailers/tanks owned by Company/Operator _____

Replacement Policy for Tanks/Trailers _____

No. of Drivers _____

Company Safety Indicators

a. DOT reportable accident rate per million vehicle miles: _____

b. Insurance premium cost per one hundred dollars of gross receipts: _____

c. Insurance Carriers _____

d. Liability Limits _____

e. Deductible _____

f. Does your insurance extend to subhaulers? _____

g. Current Bureau of Motor Carrier Safety (BMCS) rating _____

h. Date of last BMCS Safety Survey _____

i. Type of BMCS Violations Recorded _____

j. Citations/fines, if any, by Department of Transportation during past 3 years.

Company Drivers

- a. Minimum Years Driving Experience _____
- b. Physical Examination Required? _____
- c. Number of Moving Violations permitted _____
- d. Number of reportable accidents permitted _____

Driver Training

- a. Length of New Driver Training _____
- b. Frequency of Existing Driver Training _____
- c. Type of Training Used (Circle those that apply): Lecture Video Literature
- d. Training Administered by: Company Staff Driver/trainer Professional Firm
- e. Records of training maintained for each driver?

f. Training Topics Covered	Yes	No
1. Speeding Policy	_____	_____
2. Alcohol/narcotics/ drug abuse	_____	_____
3. Hazardous Materials	_____	_____
4. Placarding	_____	_____
5. Emergency Procedures	_____	_____
6. Emergency Communications	_____	_____
7. Rail/highway crossing procedures	_____	_____
8. Vehicle Inspections	_____	_____
9. Drivers Logs	_____	_____
10. Loading/bracing/blocking	_____	_____
11. Site Safety Rule Policy	_____	_____
12. Bulk Truck Specifics		
i. Loading/Unloading	_____	_____
ii. Equipment Operation	_____	_____
iii. Equipment Inspection	_____	_____
iv. Emergency Response	_____	_____

Driver Management

a. Do you have a speed limit policy? If so, summarize.

b. Do you have automated speed controls on trucks? If so, summarize.

c. Do you use remote electronic monitoring of driver performance? If so, summarize.

d. Are drivers required to report traffic violations? If so, summarize.

e. Do you have policies for logging violations? If so, summarize.

f. Do you have a method to allow for address public complaints? If so, summarize.

g. Are passengers allowed in the truck cab? If so, summarize.

h. Do you perform regular driver performance reviews, including safety compliance?

i. Do you employ a full-time safety coordinator and or team?

Vehicle Inspections & Maintenance

a. Do you drivers conduct pre-trip inspections? If so, are records kept?

b. Do you drivers conduct post-trip inspections? If so, are records kept?

c. Are vehicle inspections and maintenance performed at an in-house facility or an outside professional repair facility?

d. At what frequency are the following tractor items proactively inspected/replaced?

- | | |
|---------------------------------|-------|
| 1. Steering Controls | _____ |
| 2. Brakes | _____ |
| 3. Safety/Emergency Equipment | _____ |
| 4. Lights | _____ |
| 5. Windshield Glass | _____ |
| 6. Engine Hoses | _____ |
| 7. Fluid Levels | _____ |
| 8. Tires | _____ |
| 9. Couplings/Air Hose Condition | _____ |
| 10. Fifth Wheel Lube/Locking | _____ |
| 11. Undercarriage | _____ |

e. Where and how often are visual inspections of tank trailers performed?

f. Where and how often are hydrostatic tests of tank trailers performed?
