**BNSF Railway Company** 

Hazardous Materials Safety 2500 Lou Menk Drive, AOB-3 Fort Worth, Texas 76131

# System Hazardous Materials Emergency Response Plan

May 2024

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# **Record of Revisions/Amendment Log**

Date	Amendment Number	Pages Replaced	Summary of Changes	Individual Making Change
January 2021	0	NA	NA	NA
May 2024	1	Various	Updates associated with changes to BNSF personnel, equipment types and locations, contingency plan lists, locations and details, and response contractor information (etc.)	BNSF

# **Section 1: Introduction**

For well over a century, BNSF Railway Company (BNSF) has safely transported essential goods across the country and is proud of our commitment to the customers and communities we serve. As a leader in freight transportation, we recognize that a safe and secure railroad network is important to our way of life and essential to our nation's future. Our vision is to operate free of accidents and injuries, and we work diligently every day to make that vision a reality.

As a company, BNSF devotes extensive resources to safely move and deliver products needed for our everyday lives including hazardous materials (hazmat). Our commitment is to transport freight safely and meet the expectations of our customers, partners, employees, and the communities in which we operate.

Annually, BNSF handles over 1.6 million hazmat shipments and, on average per year, only 0.00025 percent of these shipments are involved in an accident that results in a release of hazmat to the environment. We are continuously strengthening our hazmat safety and prevention programs through forward planning and risk mitigation to reduce the potential for a hazmat incident and drive this incident rate ever closer to zero.

When incidents do occur, BNSF relies on the emergency preparedness and response programs described in this System Hazardous Materials Emergency Response Plan (SERP). The SERP has been prepared to communicate the plans, programs, personnel, and resources BNSF maintains to effectively initiate emergency responses and manage incidents in a rapid, efficient, and well-coordinated manner.

In order to describe these emergency preparedness and response programs, this document has been organized into the seven sections below:

- Section 1: Introduction
- Section 2: BNSF Contingency Plans
- Section 3: BNSF's Response Organization
- Section 4: BNSF Incident Support Resources
- Section 5: Initial Response Actions
- Section 6: Ongoing Response Actions
- Section 7: Training, Drills, and Exercises.

In general, Section 1 introduces the SERP and its intended purpose. Section 2 describes the types of contingency plans available to the BNSF Response Organization presented in Section 3. Section 4 discusses BNSF-available resources which can be used to address the initial response actions described in Section 5 and the ongoing response actions in Section 6. Finally, Section 7 contains BNSF's emergency response training, drill, and exercise programs that serve to maintain response readiness and the ability to respond to spills quickly, safely, and effectively.

The SERP is intended to provide broad topical coverage of BNSF's preparedness and response programs but does not discuss every initiative, plan, or resource, (etc.) BNSF maintains. This document is intended to be updated periodically to address changes to these BNSF programs, when needed.

# Section 2: BNSF Contingency Plans

All railroads in the United States (U.S.) have a primary responsibility for controlling incidents involving their operations, equipment, and property. BNSF recognizes and embraces this duty along with its responsibility to have effective plans and processes that minimize and control potential hazmat, health, environmental, and property risks.

BNSF writes and maintains many types of emergency preparedness and response plans serving different commodities transported, BNSF facility types, regulatory requirements, geographies, etc. This section specifically discusses several foundational BNSF plan types used and maintained by the BNSF 'Response Organization' (discussed in the next section). The foundational plan types discussed in Section 2 include:

BNSF Contingency Plans for certain oil-handling fixed facilities<sup>1</sup>

- Facility Response Plans (FRPs)
- Facility Oil Spill Response Plans (OSRPs)

**BNSF Network Operations Contingency Plans** 

- Comprehensive Oil Spill Response Plans (COSRPs)
- State/Provincial Contingency Plans

BNSF Plans for Specific Geographic Areas or Locations

- Geographic Response Plans (GRPs)
- Local Emergency Response Plans (LERPs).

Each of these plan types share common components (such as spill reporting information, notification procedures, etc.) and are aligned with respect to the overall goal of minimizing potential spill impacts. As discussed below, these plans vary with respect to their focus (i.e., fixed facilities vs. track 'facilities' vs. waterbodies) and the regulatory requirements/risk management objectives they are intended to fulfill.

Each plan is supported by various internal safety materials, playbooks, and guides and is intended to be consistent with agency-developed materials such as the National Contingency Plan (NCP) and relevant Area Contingency Plans (ACPs). Each BNSF plan described in this section is considered a 'living document' and is updated periodically due to internal changes or as required by regulation.

### 2.1 BNSF Contingency Plans for Certain Oil-Handling Fixed Facilities

Under the Clean Water Act (CWA), as amended by the Oil Pollution Act (OPA), certain fixed facilities that store one million or more gallons of oil are required to prepare and submit FRPs to respond to a worst-case discharge of oil, or a substantial threat of such a discharge occurring.

<sup>&</sup>lt;sup>1</sup> Spill Prevention, Control, and Countermeasure Plans required by 40 Code of Federal Regulations (CFR) Part 112.7 for BNSF facilities are not discussed in the SERP as they focus on spill prevention, not preparedness and response.

The U.S. Environmental Protection Agency (EPA) has established regulations that define who must prepare and submit an FRP and the required components of the FRP.

BNSF maintains 15 FRPs throughout its network as shown below in Table 2-A. In addition, BNSF maintains one OSRP for a pipeline breakout tank in Billings, Montana<sup>2</sup>.



#### Example BNSF Facility Response Plans:

BNSF FRPs (and its OSRP) are designed to:

- Present BNSF's Response Organization for that facility and the availability of response resources (i.e., equipment, trained personnel, etc.) needed to respond to an oil discharge.
- Demonstrate that response resources are available in a timely manner, thereby reducing a discharge's potential impact and severity.
- Improve discharge prevention measures through the early identification of risks.
- Aid local and regional response authorities to better understand the potential hazards and response capabilities in their area.

<sup>&</sup>lt;sup>2</sup> This OSRP is similar in structure/function to BNSF's FRPs but is prepared in a separate format due to jurisdictionally differing agency requirements.

Table 2-A: BNSF FRP and OSRP Facilities					
FRP/OSRP Facilities	State				
Barstow Yard FRP	California				
Commerce Service Facility FRP	California				
Richmond Yard FRP	California				
Denver (Globeville) Yard FRP	Colorado				
Corwith Yard FRP	Illinois				
Galesburg Yard FRP	Illinois				
Argentine Yard FRP	Kansas				
Northtown Yard FRP	Minnesota				
Alkali Creek (Billings) OSRP	Montana				
Havre Yard FRP	Montana				
Lincoln (Hobson) Yard FRP	Nebraska				
Belen Yard FRP	New Mexico				
Mandan Yard FRP	North Dakota				
Memphis Yard FRP	Tennessee				
Alliance (Haslet) Yard FRP	Texas				
Temple Yard FRP	Texas				

### 2.2 BNSF Network Operations Contingency Plans

In addition to preparing contingency plans for fixed facilities such as those described above, BNSF also maintains several types of plans covering its network operations. Network operations plans generally address linear portion(s) of the actual BNSF rail transportation network, typically associated with mainline tracks that BNSF owns.

These plans address not only emergency preparedness and response for the tracks themselves but are also inclusive of considerations for associated waterways and surrounding natural, cultural, and/or socio-economic resources that potentially may be impacted by those tracks in the event of a spill.

Coverage areas for BNSF's network operations plans range in size from 'all tracks within an individual state' (or Canadian province), to plans which address 'the entire BNSF-owned rail network in the U.S.'

### 2.2.1 BNSF Comprehensive Oil Spill Response Plan

The BNSF COSRP provides guidance to BNSF personnel on the immediate procedures, notifications, and sustained operations used in the event of an emergency response to an oil spill incident located along BNSF-owned tracks in the U.S.

BNSF's COSRP was originally prepared in 2019 in accordance with the Pipeline and Hazardous Materials Safety Administration (PHMSA) 'COSRP Final Rule' (i.e., Hazardous Materials: Oil Spill Response Plans and Information Sharing for High-Hazard Flammable Trains, 84 FR 6948, February 28, 2019, codified at 49 CFR 130 Subpart C).

The COSRP's primary purpose is to support an effective, comprehensive response that prevents injury and illness to BNSF employees and the public and mitigates possible oil spill impacts on the environment.

The specific objectives of the COSRP are to:

- Provide a COSRP 'Information Summary' used by railroad personnel responsible for initiating a response.
- Describe notification and initial response procedures to be followed when an emergency occurs.
- Provide health and safety plans/incident command forms and ACP guidelines for an emergency response.
- Define organizational lines of responsibility during the response.
- Document equipment, personnel, and other resources available to provide assistance.
- Describe the training, drills, and exercises undertaken to maintain organizational response readiness.

As depicted in the graphics below, BNSF's COSRP consists of a 'Core Plan' document and three Response Zone Plans (RZPs) collectively addressing COSRP Final Rule requirements. The Core Plan contains the majority of COSRP Final Rule compliance-driven content while the RZPs focus on resources for initiating response efforts and provide additional information which differs among BNSF's three U.S. response zone areas.

# Components Comprising the BNSF COSRP: Co





### **2.2.2 State/Provincial Contingency Plans**

BNSF also maintains the state- and province-specific Contingency Plans named below associated with BNSF tracks within the following geographies:

- State of California Inland Oil Spill Contingency Plan (pursuant to California Code of Regulations, 817.04 Inland Facilities)
- State of Minnesota Prevention and Response Plan (pursuant to Chapter 115E of the Minnesota Statutes)
- State of Oregon Oil Spill Contingency Plan (pursuant to Oregon Administrative Code 340-141)
- State of Washington Oil Spill Contingency Plan (pursuant to Washington Administrative Code 173-186)
- Province of British Columbia Spill Contingency Plan (pursuant to British Columbia Regulation 186/2017).



#### Example BNSF State/Provincial Contingency Plans:

These plans share many common components with the COSRP but vary with respect to stateand province-specific regulatory requirements for plan content, planning standards, drills and exercises, plan update frequencies, and/or submission requirements (etc.).

Where state-specific contingency plans are required, they are prepared such that the required elements of the state contingency plan are activated as part of the COSRP. Where differences in the state contingency plan and the COSRP exist, the more stringent requirement is implemented. For example, Washington state has more specific training and drill requirements than the COSRP Final Rule; therefore, in Washington, the state regulations are used for network operations training and drill compliance.

Both the state/provincial contingency plans and the COSRP are maintained and updated as required when significant information changes or after a discharge requiring plan modification occurs.

### 2.3 **BNSF Plans for Geographic Areas or Locations**

BNSF preparedness and response plans discussed in this section include those addressing specific geographic areas or locations, including: GRPs and LERPs. These plans tend to focus not only on 'how to respond', but also present specific geographic information about 'where to respond'.

Additional geographic or location-specific plans, such as those for critical and/or sensitive BNSF infrastructure (i.e., bridges, tunnels, avalanche enclosures), are also maintained by BNSF but are not discussed in detail in the SERP.

### 2.3.1 Geographic Response Plans

The GRP process was developed by the EPA and U.S. Coast Guard (USCG) to meet requirements of OPA. GRPs present plans, procedures, and field guides to support incident response management following spills or discharges throughout the GRP's coverage area.

In the event of a spilled material release, information contained within a GRP is intended to assist response personnel to coordinate an initial assessment, set response priorities, provide containment and recovery activities, and establish an incident action plan.

GRPs incorporate map-based geographic information showing approximate locations of railroad tracks, roadways, geographical features, waterbody access points, response strategy locations, and notification information. They also address readily identified sensitive natural, cultural, and socio-economic resource locations. The GRP's plans, procedures, and field guides focus on managing releases of spilled materials to surface water but may also be used to support response efforts for incidents involving releases to other media (soil, air, etc.).

#### Example BNSF-Developed GRPs:



Though railroad GRP development is not regulatorily driven, GRPs voluntarily developed by BNSF include (but are not limited to):

- Flathead River GRP
- Kootenai River GRP
- Lake Pend Oreille (subsequently adopted as a Northwest Area Committee GRP)
- Lower Colorado River GRP
- Upper Colorado River GRP (jointly developed by BNSF and Union Pacific Railroad)
- Upper and Lower Deschutes River GRPs (subsequently provided to the Northwest Area Committee)
- Upper Mississippi River GRP (jointly developed by BNSF and CPKC and subsequently provided to EPA Region 5)
- Wind River GRP.

BNSF has additionally identified agency- and other industry-developed GRPs relevant to waterbodies along BNSF's track network and has adopted their use where geographically relevant. Several examples of BNSF-relevant agency/industry GRPs include (but are not limited to):

- Middle Columbia River GRPs (Northwest Area Committee et al.)
- North Puget Sound GRP (Northwest Area Committee et al.)
- Spokane River GRP (Northwest Area Committee et al.)
- Sector Lake Michigan Geographic Response Strategies (USCG Sector Lake Michigan)
- Upper Mississippi River Pool GRPs (EPA et al.)
- Response Strategies contained within Agency ACPs, Regional Contingency Plans (RCPs), and Sub-Area Contingency Plans.

### 2.3.2 Local Emergency Response Plans

LERPs are primarily developed for specific BNSF yards, terminals, and/or intermodal facilities and contain the following types of facility-specific information:

- Local emergency notification procedures
- Immediate procedures in the event of a hazmat, medical, fire, or weather event
- Evacuation/shelter in place procedures.

As described further below, LERP facilities additionally undertake exercises on either an annual or biennial basis.

#### Example BNSF LERP:

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Emergency Alert Planning	
Emergency Alert and Notification Plan	
Evacuation and Shelter in Place Planning	
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LERPs are generally developed and maintained locally by onsite facility personnel and/or the designated facility 'Safety Committee'. BNSF has developed LERPs at the locations presented in Table 2-B below. This list is subject to change.

Table 2-B: BNSF LERP Facilities							
Facility Location	Exercise Frequency		Facility Location	Exercise Frequency			
Albuquerque, NM	Biennial		Logistics Park KC Gardner, KS	Annual			
Alliance Intermodal	Annual		Logistics Park, IL	Annual			
Alliance, NE	Biennial		Lubbock/Slaton, TX	Biennial			
Amarillo, TX - North Yard	Annual		Mandan, ND	Biennial			
Amarillo, TX - South Yard	Annual		Memphis, Memphis Intermodal, TN	Annual			
Arkansas City, KS	Biennial		Minot, ND	Annual			
Aurora/Eola, IL	Biennial		Missoula, MT	Annual			
Avondale, LA	Biennial		Murray - KC	Annual			
Bakersfield, CA	Biennial		New Westminster, BC	Biennial			
Barstow, CA	Annual		Newton, KS	Biennial			
Beaumont, TX	Biennial		North Bay, CA Intermodal	Biennial			
Belen, NM	Biennial		Northtown, MN	Annual			
Birmingham, AL	Biennial		Oakland, CA Intermodal	Biennial			
Brookfield, MO	Biennial		Oklahoma City, OK	Annual			
Carlsbad, NM	Biennial		Omaha, NE	Biennial			

Table 2-B: BNSF LERP Facilities						
Facility Location	Exercise Frequency		Facility Location	Exercise Frequency		
Casey, TX	Biennial		Pasco, WA	Annual		
Casper, WY	Biennial		Phoenix, AZ	Biennial		
Centralia, IL	Biennial		Richmond, CA	Biennial		
Cicero, IL	Annual		Salt Lake City (Utah Railway)	Biennial		
Clovis, NM	Annual		San Bernardino, CA	Biennial		
Corwith, IL	Annual		San Diego, CA	Biennial		
Dayton, TX	Annual		Seattle, WA Terminal Complex			
Denver, CO (Includes Intermodal)	Annual		(Interbay, Balmer, Seattle/			
Dilworth, MN	Annual		Stacy/SIG Hub/So Seattle Hub)	Annual		
El Paso, TX Terminal and Intermodal	Annual		Shelby, MT	Biennial		
Emporia, KS	Biennial		Sioux City, IA	Biennial		
Enid, OK	Biennial		Spokane, WA	Annual		
Everett, WA	Biennial		Springfield, MO	Biennial		
Fort Madison, IA	Biennial		St. Joseph, MO	Biennial		
Fort Worth, TX (Alliance and N. Yard)	Annual		St. Louis, MO	Biennial		
Fresno, CA	Biennial		St. Paul Intermodal	Biennial		
Galesburg, IL	Annual		Stockton, CA	Biennial		
Gallup, NM	Biennial		Stockton, CA - Intermodal	Biennial		
Galveston, TX	Biennial		Superior-Duluth, WI	Biennial		
Gillette, WY	Biennial		Tacoma/Auburn/Centralia, WA	Annual		
Hastings, NE	Biennial		Teague, TX	Biennial		
Hauser, ID	Biennial		Temple, TX	Annual		
Havre, MT	Biennial		Tulsa, OK	Annual		
Helena, MT	Biennial		Vancouver, WA Terminal Complex			
Houston, TX - HUB	Biennial		(VAW, T-6, Willbridge,			
Houston, TX - South Yard	Annual		Portland HUB)	Annual		
Joliet, IL	Biennial		Watson, CA (LA Terminal)	Annual		
KC – Argentine	Annual		Wellington, KS	Biennial		
Klamath Falls, OR	Biennial		West Quincy, MO	Biennial		
La Crosse, WI	Biennial		Whitefish, MT	Biennial		
La Mirada	Annual		Wichita Falls, TX	Biennial		
LA Terminal (Commerce, Hobart)	Annual		Williston, ND	Biennial		
Lafayette, LA	Biennial		Willmar, MN	Annual		
Laurel, MT	Annual		Willow Springs, IL	Biennial		
Lincoln, NE	Annual		Winslow, AZ	Biennial		

BNSF's annual/biennial LERP exercises are targeted at all employees working at a particular facility and are focused on evaluating and implementing the LERP itself. Engagement and participation in LERP exercises by local community responders (i.e., fire, police, city/county Emergency Management, etc.) are encouraged as it helps to maintain existing BNSF-responder relationships and allows local responders to learn the layout of the facility and become familiar with BNSF's emergency procedures.

LERP exercises are designed with the following intended outcomes:

- To demonstrate the ability to alert, mobilize, and activate personnel for emergency response and maintain operations until the situation is brought under control.
- To develop and maintain coordinated action plans to accomplish operational objectives.
- To identify and implement appropriate actions to protect emergency workers and the public.
- To demonstrate the ability to direct, coordinate, and control emergency activities using the Incident Command System (ICS).

# Section 3: BNSF's Response Organization

Contingency Plans described in the previous section represent important tools in BNSF's overall emergency preparedness and response programs but plans alone cannot be effective without a robust response team trained in their use and implementation.

This section describes the BNSF Response Organization 'team', including the personnel, experts, and processes BNSF uses to effectively initiate an emergency response, implement the proper tools, and effectively manage incidents.

Details on the BNSF Response Organization provided in this section include:

- The BNSF Incident Management Planning Process
- BNSF Qualified Individuals (QIs)
- The BNSF Incident Management Team (IMT)
- BNSF's Hazardous Materials Emergency Response Team.

#### 3.1 Incident Management

BNSF Contingency Plans, incident management approaches, and planning processes are intended to be consistent with those contained in the BNSF and USCG Incident Management Handbooks and National Incident Management System (NIMS) ICS. The graphic to the right shows the planning process BNSF generally adopts during spill responses.

### 3.2 BNSF QIs

As part of the BNSF Response Organization, BNSF QIs are to be immediately notified of a spill and are responsible for, and authorized to, initiate immediate response activities and commit BNSF resources to the response effort.

BNSF QI minimum authorities include but are not limited to:

- Activate, direct, and engage in contracting with BNSF Response Contractors and Oil Spill Removal Organization(s) (OSROs)
- (2) Act as a liaison with agency On-Scene Coordinator(s) (OSCs)
- (3) Obligate company funds for response activities.





It is the responsibility of the QI or their designee to immediately coordinate with the Federal, State, Local, and/or Tribal OSC in the initial stages of a response until relieved by a more senior QI or Incident Commander. The QI representing BNSF may also serve as the Incident Commander as defined by OPA.

The QI determines the need for activation and mobilization of the BNSF IMT in consultation with OSC(s). The IMT may be activated as a group or individually, depending upon the size, location, nature, and complexity of an incident. During a prolonged response, additional personnel may be cascaded in to sustain 24-hour or multiple day operations.

# 3.3 Incident Management Team

BNSF uses a tiered approach to managing emergency incidents. The organizational structure of the BNSF IMT allows for the mobilization of resources at varying levels as dictated by incident circumstances. BNSF's IMT maintains a large group of well-trained personnel to lead and assist with emergency response incidents and is comprised of a Local or State IMT, a Regional Away Team, and a Corporate Crisis Management Team (known as a "Go-Team"). This generalized tiered approach is illustrated below.



BNSF uses the following process to activate the IMT organization by cascading personnel to the incident location based on site-specific conditions and IMT needs:

- At the beginning of a response, and subsequently during incident operations, the QI/Incident Commander assesses the size, scope, complexity, and severity of the incident to determine full or partial activation of local team members.
- If conditions warrant, meaning additional support is needed above and beyond the local IMT, the Incident Commander (or Unified Command) mobilizes additional personnel to be activated and cascaded into the IMT organization.

IMT roles and responsibilities for each position are intended to be consistent with the job descriptions contained in the BNSF and USCG Incident Management Handbooks.

The ICS organizational chart on the next page provides an example of a BNSF IMT organizational ICS structure potentially implemented for a worst-case discharge (WCD) incident.

**Example Organizational Chart:** Possible spill response structure for a WCD. [Actual organization is determined based on the specifics of an incident.]



In addition to its emergency response functions, the BNSF IMT also develops and maintains emergency notification procedures, trains and supports emergency response teams, conducts drills and exercises, and maintains relationships with organizations that provide emergency response support.

BNSF integrates (by contract) OSROs and other spill response experts who are able to provide response resources and additional IMT expertise in areas such as incident management, wildlife management, water and air dispersion modeling, toxicology, chemistry, firefighting, communications, and railroad and commodity salvage. Contracted incident management experts are capable of supporting the BNSF IMT to manage large-scale incidents.

IMT members generally receive system, team, and position-specific ICS training. IMT members also participate in table-top drills ranging from discussion-based to full-scale functional exercises, as well as participate in equipment deployment exercises (discussed further in Section 7).

### 3.4 BNSF Hazardous Material Emergency Response Team

BNSF's Hazardous Material Emergency Response Team (HMERT) consists of trained BNSF personnel located throughout the BNSF network. The HMERT program is comprised of employees from various BNSF departments, with each team member having completed 40 hours of initial training and 24 hours of annual refresher training.

BNSF's HMERT network, shown in the graphic below, aids in quickly initiating the early stages of a response by staging trained personnel who may be able to respond locally and in-person during the time it takes BNSF QIs and/or IMT members to mobilize onsite and directly assume those activities.

HMERT personnel may undertake the following types of responsibilities while the QIs/IMT mobilize onsite:

- Identify extent of release and needs for notification
- Assume initial command as Responsible Party Incident Commander and assign roles to other responders until relieved by a more senior officer
- Provide information to authorities with response roles
- Coordinate initial assessment of hazards to human health/environment
- Initiate/implement actions to contain/remove the substance released
- Coordinate rescue and response actions with the local fire department
- Coordinate cleanup activities
- Coordinate with State or Federal OSC
- Coordinate with local fire department for firefighting activities (if necessary).





# Section 4: BNSF Incident Support Resources

The BNSF Response Organization described in Section 3 represents an important source of human capital which drives BNSF's emergency preparedness and response programs. Section 4 describes the incident support resources available to this Response Organization that may be implemented once a spill has occurred.

Incident support resources discussed in this section allow the BNSF Response Organization to effectively initiate an emergency response and manage incidents in a rapid, efficient, and well-coordinated manner.

### 4.1 BNSF Response Contractors

Assets available under contract to BNSF's Response Organization include USCG-classified OSROs, other approved emergency response specialty contractors, spill cooperatives, and Community Awareness Emergency Response groups (collectively, 'Response Contractors'). The QI or other authorized BNSF personnel provide immediate communications to BNSF Response Contractors, when needed.

Resources provided by BNSF's Response Contractors generally consist of personnel and/or equipment described as follows:

- Response Contractor-provided personnel have the authority to work within the IMT and primarily contribute to field operations or IMT support where they may fulfill roles in the Planning Section, Environmental Unit, etc.
- Response Contractor-provided equipment generally consists of emergency response resources dispatched to the site of an incident. This typically includes containment boom, oil skimmers, spilled material storage containers, and support/rigging equipment. Other equipment may also include vehicles, watercraft, mobile command post and supporting equipment, communications equipment, computers and specialized software, Unmanned Aerial Vehicles (UAVs)/Drones, containerized specialty equipment, personal protective equipment (PPE), decontamination equipment, etc.

For example, BNSF's contract with the Marine Spill Response Corporation (MSRC), a nationwide OSRO, provides access to personnel and equipment throughout the BNSF rail network. MSRC and other BNSF-contracted OSROs maintain, or make available by contract, the resources and/or capabilities necessary to respond to a spill that may float, sink, weather, or submerge; inspect and maintain this equipment in accordance with manufacturers' recommendations; and have identified related specialized service contractors to provide support with side-scan sonar, dredging, and diving services.

As an example, tabular listings of MSRC and National Response Corporation (a Republic Services Company) (and their contracted network) locations in states containing BNSF-owned tracks are provided below in Table 4-A.

#### Table 4-A: BNSF Available MSRC and NRC Locations

		-			Table 4A: BNS	F-Avai	lable MS	RC, Nationa	I Response Co	orporation, and	STAR	/ ICN Co	ntractor Lo	cations <sup>1</sup>					
City	State	OSRO	Latitude	Longitude	City	State	OSRO	Latitude	Longitude	City	State	OSRO	Latitude	Longitude	City	State	OSRO	Latitude	Longitude
Alabaster	AL	NRC	33.187748	-86.781226	Galesburg	IL	NRC	40.95160	-90.36880	Libby	MT	NRC	48.39429	-115.56631	Ingleside	TX	MSRC	27.85047	-97.22055
Bayou Labatre	AL	NRC	30.402373	-88.245283	Glenwood	IL	NRC	41.53671	-87.62723	Sidney	MT	NRC	47.71801	-104.18195	Ingleside	TX	MSRC	27.85031	-97.22131
Birmingham	AL	NRC	33.583614	-86.635368	Lemont	IL	NRC	41.66570	-87.96660	Sidney	MT	NRC	47.69935	-104.16845	Kenedy	TX	NRC	28.76950	-97.83540
Birmingham	AL	NRC	33.58406	-86.632587	Loves Park	IL	NRC	42.32131	-88.95498	North Platte	NE	NRC	41.13480	-100.77390	Kilgore	TX	NRC	32.36798	-94.88782
Mobile	AL	NRC	30.688307	-88.031365	Mokena		NRC	41.531604	-87.853913	Omana	NE	NRC	41.08873	-96.25877	La Marque	TX	NRC	29.35754	-94.99508
Theodore	AL	NRC	30.567065	-00.129400	Roxana	11	NPC	38 81257	-90.050314	Omaha	NE	NRC	41.22327	-90.12999	La Porte	TX	NRC	29.07233	-95.03748
Trussville	AL	NRC	33.558145	-86.614671	Sauget	IL	NRC	38.59764	-90.18211	South Sioux City	NE	NRC	42.46629	-96.42078	LaPorte	TX	NRC	29.66758	-95.03114
Chandler	AZ	NRC	33.3203	-111.8664	Sauget	IL	NRC	40.644444	-107.769167	Albuquerque	NM	NRC	35.11269	-106.61275	Laredo	TX	NRC	27.49297	-99.42865
Cabot	AR	NRC	34.917945	-92.082758	Wood River	IL	NRC	38.861944	-90.096667	Albuquerque	NM	NRC	35.08657	-106.71841	Laredo	TX	NRC	27.49085	-99.43354
El Dorado	AR	NRC	33.179089	-92.748224	Davenport	IA	NRC	41.527073	-90.582944	Belen	NM	NRC	34.66040	-106.77690	Lincoln	TX	MSRC	30.27879	-96.94521
Little Rock	AR	NRC	34.731	-92.3484	Des Moines	IA	NRC	41.636036	-93.600524	Beulah	ND	NRC	47.28396	-101.88638	Longview	TX	NRC	32.49169	-94.80792
Little Rock	AR	NRC	34.67721	-92.31648	Des Moines	IA	NRC	41.65621	-93.78428	Dickinson	ND	NRC	46.97034	-102.77899	Midland	TX	NRC	31.93607	-102.07628
Alameda	CA	NRC	38 766667	-122 983333	Des Moines	IA	NRC	41.618088	-93.617979	Eargo	ND	NRC	46.86456	-96.83266	Orange	TX	NRC	30.052021	-93 91107
Alameda	CA	NRC	37.776306	-122.299011	Great Bend	KS	NRC	38.36168	-98.815938	Grand Forks	ND	NRC	47.93611	-97.09687	Port Arthur	TX	MSRC	29.83282	-95.95679
Bakersfield	CA	NRC	35.35387	-118.92249	Olathe	KS	NRC	38.8932	-94.8713	Grand Forks	ND	NRC	47.93391	-97.11396	Port Arthur	TX	NRC	29.89076	-93.93005
Benicia	CA	MSRC	38.043317	-122.15248	Olathe	KS	NRC	38.88093	-94.80257	Keene	ND	MSRC	47.88803	-102.94350	Port Arthur	TX	NRC	29.89876	-93.97848
Benicia	CA	NRC	38.0683	-122.1616	Wichita	KS	MSRC	37.757733	-97.304515	Mandan	ND	NRC	46.82793	-100.88654	Port Arthur	TX	NRC	29.92373	-94.01593
Bioomington	CA	MSBC	34.0621	-117.4001	Wichita	KS	NRC	37.729581	-97.318291	Minot	ND	NRC	48.22394	-101.29606	Port Arthur Bound Book	TX	MSBC	29.95077	-93.88216
Chico	CA	NRC	39.803423	-121.85285	Wichita	KS	NRC	35.120262	-101.820265	Watford City	ND	NRC	47.73816	-103.29328	Runge	TX	MSRC	28.92997	-97.79195
Chico	CA	NRC	39.7372	-121.8328	Baton Rouge	LA	NRC	30.56768	-91.21099	Williston	ND	NRC	48.17632	-103.62935	Runge, TX	TX	MSRC	28.92997	-97.79195
Compton	CA	NRC	33.8971	-118.225	Bell City	LA	NRC	30.069444	-93.018611	Williston	ND	NRC	48.18325	-103.64055	Saginaw	TX	NRC	32.85970	-97.37530
Concord	CA	MSRC	38.01153	-122.033579	Belle Chasse	LA	MSRC	29.83709	-90.05021	Ardmore	OK	NRC	34.19338	-97.16986	San Antonio	TX	NRC	29.44326	-98.41116
Corona	CA	NRC	33.761272	-117.481305	Belle Chasse		NRC	29.7657	-90.0116	Ardmore	OK	NRC	34.17896	-97.13081	San Marcos	TX	NRC	29.77626	-97.94643
El Segundo	CA	MSRC	33.912835	-118.398865	BUSSIER CITY		MSBC	32.5493	-93.66707	Bartlesville	OK	NRC	36.78603	-95.93627	San Saba	TX	MSRC	31.07069	-98.73353
Eureka	CA	MSRC	40.790013	-124.104031	Buras		MSRC	29.354943	-89.460361	Noble	OK	NRC	35 16167	-97.39222	Victoria	TX	NRC	28 95230	-96 98310
Eureka	CA	NRC	40.807678	-124.151451	Chalmette	LA	NRC	29.958817	-89.955259	Oklahoma City	OK	NRC	35.46964	-97.48570	Zapata	TX	NRC	26.89060	-99.13080
Fairfield	CA	MSRC	38.211362	-122.132591	Fort Jackson	LA	MSRC	29.357718	-89.455056	Tulsa	OK	NRC	36.17302	-95.86262	Aberdeen	WA	NRC	46.97610	-123.81830
Fields Landing	CA	MSRC	40.7234	-124.2218	Fourchon	LA	NRC	29.3682	-90.2	Tulsa	OK	NRC	36.19411	-95.91825	Aberdeen	WA	NRC	46.96969	-123.84750
Hayward	CA	NRC	37.63833	-122.12349	Galliano		NRC	29.421944	-90.301111	Tulsa	OK	NRC	36.15000	-95.98333	Anacortes	WA	MSRC	48.51049	-122.60824
Highland		MEDC	33,810124	-117.20833	Geismar Golden Moodern		NRC	30.45	-91.15	Tulsa	UK	NRC	36 17079	-95.89811	Anacortes	WA	MSRC	48.51091	-122.60853
Long Beach	CA	MSRC	33.772321	-118.210974	Golden Meadow	LA	NRC	29.11556	-90.19704	Wilson	OK	NRC	34.17390	-97.43951	Anacortes	WA	NRC	48.50060	-122.62980
Long Beach	CA	MSRC	33.772336	-118.210957	Golden Meadow	LA	NRC	29.217361	-90.218734	Astoria	OR	MSRC	46.18666	-123.85866	Anacortes	WA	NRC	48.51370	-122.60958
Long Beach	CA	MSRC	33.74504	-118.11689	Gonzales	LA	NRC	30.2241	-90.9201	Astoria	OR	MSRC	46.18897	-123.86067	Auburn	WA	NRC	47.30243	-122.22953
Long Beach	CA	NRC	33.74962	-118.27485	Grand Isle	LA	MSRC	29.253967	-89.973833	Astoria	OR	MSRC	46.18756	-123.86087	Bellingham	WA	MSRC	48.75432	-122.50576
Long Beach	CA	NRC	33.76880	-118.17905	Harvey	LA	NRC	29.8673	-90.069	Astoria	OR	MSRC	46.19019	-123.85678	Bellingham	WA	NRC	48.75310	-122.50240
Long Beach	CA	NRC	34.76667	-118.18333	Harvey	LA	NRC	29.893426	-90.076222	Astoria	OR	NRC	46.09470	-123.68560	Bellingham,	WA	MSRC	48.75323	-122.48708
Long Beach	CA	NRC	29.78333	-95.11667	Houma	LA	MSRC	29.571046	-90.701318	Clackamas	OR	NRC	45.42443	-122.57535	Blaine	WA	MSRC	48.86857	-122.74874
Martinez	CA	MSRC	38.02582	-122.07030	Houma		NRC	29.583333	-90.710007	Clatskania	OR	NRC	45.40417	-122.03722	Eastsound	WA	MSRC	43.00203	-122.00072
Martinez	CA	NRC	37 97880	-122 16470	Jefferson	IA	NRC	29 96055	-90 156682	Fugene	OR	NRC	44 11785	-123 18822	Everett	WA	MSRC	47 94017	-122 25234
McClellan Park	CA	MSRC	38.65933	-121.38530	Lafavette	LA	NRC	30,15344	-91,99429	Portland	OR	MSRC	45.57939	-122.76169	Everett	WA	NRC	47.95170	-122.21590
Monterey	CA	MSRC	36.59046	-121.84417	Lafitte	LA	NRC	29.660713	-90.108517	Portland	OR	MSRC	45.56559	-122.74507	Ferndale	WA	MSRC	48.82885	-122.70558
Moss Landing	CA	NRC	36.80000	-121.78333	Lake Charles	LA	MSRC	30.110337	-93.22292	Portland	OR	NRC	45.51667	-122.66667	Ferndale	WA	NRC	48.85580	-122.59670
National City(Pier 32)	CA	MSRC	32.65007	-117.10847	Lake Charles		MSRC	30.105503	-93.302014	Portland	OR	NRC	45.56887	-122.71709	Ferndale	WA	NRC	48.86169	-122.70433
National City	CA	MSRC	32.65753	-117.11801	Laplace		NRC	30.077	-90.486667	Portland	OR	NRC	45.59000	-122.77794	Friday Harbor	WA	MSRC	48.60385	-123.15612
Orange	CA	NRC	34 20034	-119 18012	Morgan City		NRC	29.683333	-91.2	St Helens	OR	NRC	45.86090	-122.93417	Hoguiam	WA	NRC	46.98140	-123.88090
Port Hueneme	CA	MSRC	34.15060	-119.20190	Morgan City	LA	NRC	29.701241	-91.202919	Sherwood	OR	NRC	45.33326	-122.78686	Kent	WA	NRC	47.36562	-122.23447
Port Hueneme	CA	NRC	34.14819	-119.19492	New Iberia	LA	NRC	30.004825	-91.84408	Sisters	OR	NRC	44.29514	-121.55294	Longview	WA	NRC	46.20980	-123.06440
Port Hueneme	CA	NRC	34.14772	-119.19991	New Iberia	LA	NRC	30.0034	-91.8189	Tualatin	OR	NRC	45.38059	-122.78563	Longview	WA	NRC	46.10748	-122.94173
Port Hueneme	CA	NRC	33.75861	-118.23796	New Iberia	LA	NRC	30.006897	-91.830097	Piedmont	SD	NRC	44.16597	-103.09923	Longview	WA	NRC	46.11379	-122.93876
Richmond	CA	MSRC	37.94398	-122.36740	New Orleans		NRC	30.029418	-89.93191	Rapid City Blouthallo	SD	MSRC	44.09603	-103.16709	Monroe Mosos Lako	WA	NRC	47.86579	-122.00331
Richmond	CA	MSRC	37.94623	-122.37003	Shreveport	IA	NRC	32 4605	-93 7761	Chattanooga	TN	NRC	35.00613	-85.37844	Neah Bay	WA	MSRC	48.36737	-124 61255
Richmond	CA	MSRC	37.91620	-122.36990	Shreveport	LA	NRC	32,553655	-93,773362	Chattanooga	TN	NRC	35.09237	-85.24724	Neah Bay	WA	MSRC	48.34738	-124.66795
Richmond	CA	NRC	37.90596	-122.37135	St. Gabriel	LA	NRC	30.248514	-91.082195	Goodlettsville	TN	NRC	36.28323	-86.74820	Neah Bay	WA	MSRC	48.36730	-124.61235
Richmond	CA	NRC	37.92539	-122.35587	St. Rose	LA	NRC	29.963367	-90.304239	Greenbrier	TN	NRC	36.41815	-86.79102	Neah Bay	WA	MSRC	48.36849	-124.59627
Richmond	CA	NRC	44.10000	-69.11667	Sulphur	LA	NRC	30.207118	-93.331295	Knoxville	TN	NRC	35.97850	-84.00150	Neah Bay	WA	NRC	48.36850	-124.62380
San Diego	CA	MSRC	32.09924	-117.14/14	Sulphur		NRC	30.177	-93.4055	Lenoir City	TN	NRC	35.87252	-84.24382	Olympia	WA	NRC	48.30038	-122.80410
San Diego	CA	MSRC	32.69745	-117.15150	Venice	LA	NRC	29.31632	-89.38972	Memphis	TN	MSRC	35.11953	-90.07826	Pasco	WA	NRC	46.22582	-119.04202
San Diego	CA	NRC	32.88231	-117.18172	Venice	LA	NRC	29.2037	-89.3875	Memphis	TN	NRC	35.00091	-89.88090	Pasco	WA	NRC	46.22910	-119.07943
San Diego	CA	NRC	32.70000	-117.15000	Anoka	MN	NRC	45.221557	-93.411293	Memphis	TN	NRC	35.06137	-90.03950	Pasco	WA	NRC	46.24814	-119.07766
San Diego	CA	NRC	32.88092	-117.17665	Bemidji	MN	NRC	47.478833	-94.875333	Memphis	TN	NRC	35.00472	-89.88321	Pasco	WA	NRC	46.23780	-119.10480
San Francisco	CA	NRC	37.76667	-122.41667	Cannon Falls	MN	NRC	44.532031	-92.912801	Millington	IN	NRC	35.27598	-89.94472	Port Angeles	WA	MSRC	48.12235	-123.44549
San Jose	CA	NRC	37 39026	-121 91143	Elk River	MN	NRC	45.314222	-93 603564	Nashville	TN	NRC	36 14390	-86 73340	Port Angeles	WA	MSRC	48 12467	-123 44016
San Jose	CA	NRC	45.90861	-122.73944	Eveleth	MN	NRC	47.46055	-92.54099	Nashville	TN	NRC	36.10872	-86.74985	Port Angeles	WA	MSRC	48.12512	-123.43945
San Pedro	CA	MSRC	33.73392	-118.27066	Eveleth	MN	NRC	47.459783	-92.538808	Alice	TX	NRC	27.75180	-98.06940	Port Angeles	WA	MSRC	48.12577	-123.45482
San Pedro	CA	MSRC	33.73515	-118.27089	Moorhead	MN	NRC	46.857349	-96.739384	Aransas Pass	TX	NRC	27.87398	-97.15760	Port Angeles	WA	NRC	48.12846	-123.47407
Santa Fo Springs	CA CA	NRC	33,05205	-118.27826	New Hone	MN	NRC	40.834862	-90.705508	Baytown		NRC	29.72988	-95.00077	Port Angeles	WA	NRC	47.95550	-123.81320
Sausalito	CA	NRC	37,85690	-122,48880	Plymouth	MN	NRC	44,993312	-93,403822	Beaumont	TX	NRC	30.03442	-94,09650	Port Angeles	WA	NRC	48,12160	-123,44183
Signal Hill	CA	NRC	33.80696	-118.17020	Rodgers	MN	NRC	45.20337	-93.57468	Beaumont	TX	NRC	29.93417	-94.17043	Port Angeles	WA	NRC	48.12381	-123.44316
Stockton	CA	MSRC	37.95137	-121.32816	Stacy	MN	NRC	45.396442	-92.996489	Channelview	TX	NRC	29.79120	-95.11650	Port Townsend	WA	NRC	48.11850	-122.77700
Stockton	CA	NRC	37.94513	-121.32216	Two Harbors	MN	NRC	47.01947	-91.677862	Cibolo	TX	NRC	29.56503	-98.23708	SeaTac	WA	NRC	47.42417	-122.31750
Stockton Torminal Jalanci	CA	NRC	37.94983	-121.36129	Clinton	MS	NRC	32.35736	-90.36097	Corpus Christi		NRC	27.79250	-97.45444	Seattle	WA	MSRC	47.67814	-122.41060
Terminal Island	CA CA	NRC	33 73761	-118,26364	Hernando	MS	NRC	34 823333	-00.000824	Cuero		MSRC	29 11860	-95.08498	Seattle	AWA AW	MSRC	47.38088	-122.30/01
Valleio	CA	MSRC	38.10981	-122.27111	Jackson	MS	NRC	32.3239	-90.2068	Dallas	TX	NRC	32.90458	-96.89042	Seattle	WA	NRC	47.60000	-112.31667
Vallejo	CA	MSRC	38.10980	-122.27111	Moss Point	MS	NRC	30.410563	-88.475899	Dallas	TX	NRC	32.78120	-96.87900	Seattle	WA	NRC	47.51797	-122.32034
Ventura	CA	NRC	34.31398	-119.29075	Nesbit	MS	NRC	34.880453	-90.004427	Dallas	TX	NRC	32.70782	-96.67392	Seattle	WA	NRC	47.63359	-122.38115
Ventura	CA	NRC	34.16552	-119.22838	Pascagoula	MS	MSRC	30.35686	-88.50808	Darrouzett	TX	NRC	36.44595	-100.33308	Seattle	WA	NRC	47.65859	-122.38274
West Sacramento	CA	MSRC	38.56260	-121.54540	Pascagoula	MS	MSRC	30.35409	-88.50865	Deer Park		NRC	29.70825	-95.13326	Snohomish	WA	NRC	47.92811	-122.09690
West Sacramento	CA CA	NRC	38 58760	-121.03430	Pascagoula	MS	NRC	30.300523	-00.008400	Deer Park		NRC	29.70046	-95.13809	Spokane Vallov	VVA WA	NRC	47.66054	-117 31504
West Sacramento	CA	NRC	38,57939	-121,55363	Southaven	MS	NRC	34,99325	-90,10126	Deer Park	TX	NRC	29,70324	-95,12983	Spokane Valley	WA	NRC	47.66128	-117,31654
West Sacramento	CA	NRC	38.57221	-121.33634	Arnold	MO	NRC	38.460731	-90.427754	Denton	TX	NRC	33.23688	-97.08116	Tacoma	WA	MSRC	47.262569	-122.432794
Arvada	CO	NRC	29.31861	-89.81417	Kansas City	MO	NRC	39.092288	-94.577745	Edinburg	TX	NRC	26.36200	-98.16160	Tacoma	WA	NRC	47.086981	-122.360849
Carr	CO	NRC	40.89616	-104.87008	Kansas City	MO	NRC	39.1628	-94.4478	Ennis	TX	NRC	32.36353	-96.57031	Tacoma	WA	NRC	47.2534	-122.4432
Commerce City	C0	NRC	39.86410	-104.82190	Kansas City	MO	NRC	38.870921	-94.537093	Florence	TX	MSRC	30.80203	-97.76885	Tacoma	WVA	NRC	47.30409	-122.51215
Denver	00	NRC	39,75347	-104.89187	Liberty	MO	NRC	39.103882	-94.463/52	Fort Worth		NRC	32.00221	-97.20411	Tacoma	AWA AW	NRC	47.15500	-122.40132
Henderson	CO	NRC	39,87426	-104,87374	Sprinafield	MO	NRC	37.214841	-93,269411	Galveston	TX	MSRC	29,28733	-94,86458	Westport	WA	NRC	46,8875	-124,101667
Windsor	CO	NRC	40.47426	-104.88413	Springfield	MO	NRC	37.1961	-93.2841	Galveston	TX	MSRC	29.31407	-94.78401	Germantown	WI	NRC	43.22496	-88.117996
Boise	ID	NRC	43.54164	-116.18274	St. Louis	MO	NRC	38.616667	-90.183333	Galveston	TX	MSRC	29.31407	-94.78410	Hudson	WI	NRC	44.9732	-92.7448
Boise City	ID IF	NRC	43.54192	-116.18223	St. Louis	MO	NRC	38.689774	-90.389193	Galveston	TX	NRC	29.20290	-94.95760	Kaukauna	WI	NRC	44.303869	-88.259561
Boise City		NRC	43.57541	-116.25565	University City	MO	NRC	38.66371	-90.29933	Houston	TX	MSRC	29.94608	-95.34281	Milwaukee	VVI	NRC	43.015252	-88.205055
Decatur	11	NRC	39.81049	-88.87223	Billings	MT	NRC	45.74651	-108.58458	Houston	TX	NRC	29.67469	-95,23012	Casher	WY	MSRC	42.854744	-106.249455
Decatur	IL.	NRC	39.86858	-88.93453	Helena	MT	NRC	46.59370	-112.02750	Houston	TX	NRC	29.72215	-95.27551	Cheyenne	WY	NRC	41.12446	-104.84116
Dotton	IL	NRC	41.64456	-87.60567	Helena	MT	NRC	46.59278	-111.97421	Houston	TX	NRC	29.92449	-95.34365	Cheyenne	WY	NRC	41.18142	-104.82811
Edwardsville	IL	NRC	38.82168	-90.03940	Laurel	MT	NRC	45.67732	-108.72567	Houston	TX	NRC	29.75000	-95.35000	Newcastle	WY	MSRC	43.850287	-104.211618
Galesburg	IL	NRC	41.00516	-90.36413	Libby	MT	NRC	48.39346	-115.56708	Houston	TX	NRC	29.76058	-95.36968	Sheridan	WY	MSRC	44.664867	-106.902895
															Sheridan	WY	NRC	44.79516	-106.95586

Notes: 1: Table contains MSRC, National Response Corporation, and applicable STAR / ICN Contractor locations in states containing BNSF-owned tracks based on data provided in 2022. Additional BNSF-available OSRO locations are located throughout the U.S. Source: BNSF COSRP, 2024.

In addition to MSRC and NRC asset locations above, BNSF maintains additional contracts with other OSROs and specialty contractors [such as the Oiled Wildlife Care Network (OWCN), Whitewater Rescue Institute, etc.].

If needed, BNSF is prepared to supplement OSRO-provided equipment with additional BNSFowned emergency resources discussed in Section 4.2.

### 4.2 BNSF-Owned Specialized Equipment

As an organization, BNSF has purchased and staged numerous types of emergency response equipment throughout its network to support the Response Organization. This equipment varies from conventional containerized oil spill response equipment to highly specialized commodity-specific leak capping kits, ice-response assets, firefighting trailers, and breathing air equipment. Collectively, this specialized equipment helps BNSF attain Best Achievable Technology (BAT) capabilities.

In general, this equipment is staged at strategic locations throughout BNSF's network to provide capabilities that may not be available locally from Response Contractors (i.e., in rural portions of the network), or to aid in addressing commodity-specific or volume-related needs of a particular location or rail subdivision. Figures 1 through 8 at the end of the SERP depict locations of this equipment, by equipment type. The graphic below presents all BNSF-owned equipment types on a single network-wide map.



# 4.3 BNSF Geographic Information System (GIS)

BNSF has developed a web-based GIS mapping application, the BNSF 'Environmental Viewer' (depicted below), to provide both cached and real-time data on locations of assets, infrastructure, and natural, cultural, and socio-economic resources across the BNSF network.



The Environmental Viewer provides detailed information that allows BNSF to quickly evaluate incidents and answer important response initiation questions such as:

- Which federal, state, county, and local emergency agency jurisdictions are the spill located in?
- Does demographics information suggest community air monitoring may need to be initiated immediately?
- Is the spill located near a waterway?
  - o If yes, where does that waterway go?
  - Are pre-developed GRP response strategies located along the waterway that could be implemented?
- Are readily identifiable natural, cultural, or socio-economic resources located in the vicinity of the spill (or downstream)?

- Where is the closest BNSF-owned emergency response equipment located and how far away is it?
  - What is the inventory of equipment available at that location?
  - Who should be called to mobilize this equipment to the incident?

This web-based mapping application represents one of many technology-based incident support resources available to the BNSF Response Organization. Other examples include the BNSF 'Hazmat Center', ICS-driven software platforms, the AskRail® mobile application, air and water spill dispersion models, etc.

# **Section 5: Initial Response Actions**

By providing plans, personnel, and equipment, the resources described in Sections 2 through 4 allow BNSF to remain poised to initiate an emergency response at any time and at any location throughout its rail network. Once an incident has occurred, the response actions described in Section 5 are intended to be implemented (as appropriate to the spill) in the initial phases of the response.

BNSF resources, such as standalone 'Emergency Response Action Plans' (ERAPs), describe these initial response actions and provide time-critical information for the emergency phase of a spill.

#### Example BNSF ERAPs:



Initial response actions are designed to be scalable across a spectrum of incident types and magnitudes and are also used for training and exercises. This section presents a general summary of several key BNSF initial response actions, including:

- BNSF's Initial Response Checklist
- Health and Safety
- Notifications
- Evacuations/Site Safety
- Spill Assessment and Tracking
- Air Monitoring
- Resource Identification
- Resource Protection.

#### 5.1 Initial Response Checklist

In the event of a spill, BNSF may implement the actions listed in the Initial Response Checklist (Checklist) as an aid to address incident objectives.

An example Checklist is provided on the following pages.

# **Initial Response Checklist**

Instructions: The checklist below provides a summary of potential items to be undertaken and the resources available to complete each item. Use the checklist as an aid in completing the items which follow.

#### 1. Spilled Material Incident Internal Reporting:

In the event you are immediately present at the location of a railroad spilled material incident, do the following immediately:

- 1.1 Take all precautions necessary to protect yourself and your coworkers.
- 1.2 Check the wind direction.
- 1.3 Isolate and secure the immediate area and directly down wind.
- 1.4 Attempt to verify that railroad employees, contractors, and the public do not enter the affected area or are escorted from the area.
- 1.5 Evaluate the potential for oil to submerge or sink, depending on its chemical properties, environmental factors (weathering), and method of discharge.
- 1.6 If safe to do so obtain as much information on the situation as possible, including:
  - Exact location of the incident.

involved.

- ✓ Circumstances of the incident.  $\checkmark$  Initials, placard information, and numbers of cars that may be
  - $\checkmark$  Weather conditions, including wind direction, at the incident site.
  - ✓ Distance to the nearest populated areas. ✓ Possible impact to waterways.
- Commodities or materials involved. [Utilize consist (if available) to access shipper/ commodity-specific information, SDS(s), and/or emergency contact number(s).]
- ✓ Where the train or switch crew can be located and how they can he identified ✓ Severity of the incident, specifically situations that may pose nmediate danger to life, health, or the environment
  - ✓ Any emergency response activities already initiated and by whom.

#### Initiate BNSF Internal Notification Procedures:

[See Section 1.2: Notification Procedures]

#### 2. External Notifications:

The notifications checkbox is checked only after components below are obtained.

		2.1	Confirm Internal Notification Procedures have been undertaken. [See Section 1.2 Notification Procedures]
Tasks: Resources:	urces:	2.2	Confirm applicable railroad Hazmat Manager(s) (and/or Qualified Individuals, Spill Management Team, etc.), Emergency Response Contractor(s) (PRCs/OSROs), and other applicable personnel have been notified in a timely manner. Document notifications made. [See Section 1.1 Contact Sheet & 1.2: Notification Procedures] [See Section 1.3 Hazmat Release Checklist] [See Section 2 ER Equipment]
	Reso	2.3	Confirm government incident support agencies and other government stakeholders (as warranted) have been notified in a timely manner. Document notifications made. [See Section 1.2 Notification Procedures] [See Section 1.3 Hazmat Release Checklist]
		2.4	Complete and update applicable spill reporting form(s) containing available initial spill information, including an assessment of environmental conditions. Document notifications made. [See Section 1.3 Hazmat Release Checklist & Env. Conditions]

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# **Initial Response Checklist**

#### 3. Initial Staff and Equipment Mobilization:

The staff/equipment mobilization checkbox is checked only after components below are obtained.

		3.1	Mobilize applicable railroad Hazmat Manager(s) (and/or Qualified Individuals, Spill Management Team, etc.), PRCs and/or Emergency Response Contractor(s). [See Section 1.1 Contact Sheet & 1.2: Notification Procedures] [See Section 2 ER Equipment]
asks:	esources:	3.2	Mobilize BNSF TacTox air monitoring equipment and contractor(s). [Call CTEH: 866-869-2834 (24-hr.) CTEH will contact BNSF TacTox contractors for dispatch and establish action levels and equipment/materials required for initial air monitoring.]
	R	3.3	<ul> <li>Mobilize personnel/equipment owned by PRCs, ER contractors and/or BNSF.</li> <li>Notify/mobilize regional equipment if additional and/or cascading resources are anticipated to be needed.</li> <li>[See Section 2 ER Equipment]</li> </ul>

#### 4. Initial Response Actions:

The initial response actions checkbox is checked only after components below are obtained.

		4.1	Identify spilled materials type and acquire SDS. Request and ensure SDS(s) are
			available to safety officer.
			[See Train Consist or utilize AskRail ® mobile application]
			[Contact Shipper via Consist information]
			[Contact Chemtrec: 800-424-9300]
		4.2	Assess initial site safety issues and first responder/public safety.
			Work with local responders to protect life safety and minimize property damage
			Develop Health and Safety Plan, including an assessment of Personal Protective
			Equipment (PPE) requirements. Implement site sofety assessment /PPE requirements
asks:			See Section 3.1 BNSE Health and Safety Plan
			Deference and de experience in manifesting
	e S	4.5	Fenomi and document air monitoring.
	- Ž		[Coordinate with CTEH of enorts initiated under Step 5.2]
	- Fi	4.0	within 6-hours, as appropriate:
	keso		• Confirm the Incident Commander or their designee has initiated assessment(s)
H			regarding the potential for oil to submerge or sink and has initiated the associated
1 ·	-		assessment/ consultation tasks. Use NWACP Section 9412 and Attachment A – 9412.At
			Considerations Form if persently
		47	Portorn Job Hezard Analysis and Safety Briofing(s)
		4.1	Le data initial apill atatua information. [Stana balaw non-accumutially ordered ]
		L 4.0	Determine if the spill source is controlled, as if it is an angoing selesse. (If angoing attempt to determine
			the release rate.)
			Calculate preliminary spill volume and/or estimate the potential spill-impacted area.
			For example: Comparing initial volume versus final volume of container. Estimating
			dimensions of sheen or pooled area.]
			If spill to land, evaluate the potential for groundwater impacts.
			Update assessment of environmental conditions.
			See Section 5 Geographical Response Plans and Resource References/Links

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# **Initial Response Checklist**

		Analyze where spilled materials are going (using trajectory, river speed). Engage agencies/contractors to request modeling and/or refine estimates. [NOAA Office of Response and Restoration: 206-526-4911 (24-hr.); BNSF-contractor Polaris Applied Sciences: 206-359-5686/206-660-5753] Refine instructions to dispatched personnel/equipment to allocate resources intended to address the spilled material's estimated downstream leading edge. [See Section 2 ER Equipment]
		Evaluate whether federal, state, and/or local permit(s) may be necessary to perform initial response actions. Begin permit application process(es), if warranted. [See Section 3.2 BNSF Emergency Permit Matrix] Update BNSF Health and Safety Plan with additional assessment information above, if warranted.
		[See Section 3.1 BNSF Health and Safety Plan]
	4.9	Contact WA Ecology, review NWACP GRPs and other tools to identify potential populations at risk, natural, economic, and/or cultural resources within the spill trajectory.
	OR	[See Section 5 Geographical Response Plans and Resource References/Links]
		Not applicable.
<b>SS</b>	□ 4.10 <u>or</u> □	Evaluate potential response strategies for implementation.
[as]		[See Section 5 Geographical Response Plans and Resource References/Links] Not applicable.
T Re	4.11	<ul> <li>Document early actions on ICS 201 form.</li> <li>Develop Initial Incident Map.</li> <li>Develop Objectives.</li> <li>Document Current Actions including input from key team members.</li> <li>Initial ICS Organization.</li> <li>Document Initial Resources ordered on ICS 201 form.</li> <li>[See Section 3.3 Blank ICS 201 Forms]</li> </ul>
	4.12	<ul> <li>Transition key personnel from initial response team to the spill management team through completion of an Initial Incident Briefing (ICS 201).</li> <li>Use ICS 201 or equivalent handout available for Unified Command.</li> <li>Follow ICS 201 format for briefing.</li> <li>Identify Objectives during briefing.</li> <li>Identify and introduce key members.</li> <li>[See Section 3.3 Blank ICS 201 Forms]</li> </ul>
	4.13	<ul> <li>Activate supplemental response resources – as warranted.</li> <li>Call out/mobilize additional resources.</li> <li>Integrate and coordinate those resources with other plan resources.</li> <li>[See Section 2: ER Equipment]</li> </ul>

# **Resources Under Separate Cover:**

• Emergency Response Guidebook (ERG), Wireless Information System for Emergency Responders (WISER), NIOSH Guide, or other reference resources.

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Supporting materials maintained by BNSF expedite completion of individual Checklist tasks by providing resources such as:

- The BNSF Health and Safety Plan
- Notification procedures flow charts
- Emergency contact phone numbers
- The BNSF initial spill report form
- Maps and tables of BNSF-available emergency response resources
- Blank ICS 201 forms.

Checklist supporting materials used, when appropriate, by BNSF during responses are described in the following sections.

# 5.2 Health and Safety

In any response, the priority response objective is protection of public health and safety which includes response worker health and safety. Reflecting this, health and safety considerations are integrated by BNSF throughout all aspects of response initiation and are located throughout the Checklist, beginning with Checklist Task #1.1. Health and safety-specific Checklist tasks include (but are not limited to):

- Assessing initial site safety issues and first responder/public safety
- Working with local responders to protect life safety
- Developing BNSF's Health and Safety Plan/Implementing site safety assessment(s)/PPE requirement(s)
- Performing and documenting air monitoring
- Performing Job Hazard Analyses and Safety Briefing(s)
- Maintaining the Health and Safety Plan with updated assessment information.

BNSF's health and safety programs comply with federal requirements contained in Occupational Safety and Health Administration (OSHA) regulations regarding Hazardous Waste Operations and Emergency Response as outlined in 29 CFR, Part 1910.120. These requirements, commonly referred to as

#### Example BNSF Health and Safety Plan Template:



HAZWOPER regulations, were established for the health and safety of personnel involved in response and cleanup operations.

## 5.3 Notifications

#### 5.3.1 Spill Reporting

In concert with development and integration of health and safety considerations, notification tasks are one of the Checklist's first response actions. Materials supporting the completion of notification tasks include example BNSF internal and external notification procedures (provided below), BNSF's 'Governmental Spill Notification Procedure for Environmental and Hazardous Material Releases' Manual, and Hazardous Material Customer Notification Protocol.

These prioritized notification procedures are designed to guide the communication of information from the time an incident occurs through agency spill reporting, stakeholder and customer notifications, and personnel/equipment dispatch.



# **BNSF Internal Notification Procedures**



# **BNSF External Notification Procedures – RZ 1 Central**

As part of these internal/external notification procedures, BNSF hazardous material customers are notified via the emergency response contact phone number listed on their shipping paper when the shipment (load or residue/car load or intermodal) is in destress. Destress means:

- Has sustained a release
- Is derailed and NOT upright
- Has car body or tank shell damage.

Information that should be provided in both initial and follow-up notifications includes:

- Name of railroad
- Time of discharge
- Location of discharge

- Name of spilled material(s) involved
- Reason for discharge
- Estimated volume discharged
- Weather conditions on-scene
- Actions taken or planned by persons on-scene.

### 5.3.2 Informing the Public

The ability of BNSF and civil authorities to share incident information and keep potentially impacted members of the public informed is a paramount health and life safety function. As discussed in the next section, information regarding evacuations, closures, or shelter-in-place directives outside of BNSF's property are made by civil authorities using tools such as reverse 911, incident hotlines, social media, etc.

Other information regarding the incident, its status, and progress may be generated and communicated by the BNSF External Communications or Corporate Relations departments, in coordination with public agencies.

General roles/responsibilities for these BNSF departments include:

- External Communications: In coordination with BNSF Corporate Relations and Social Media teams, External Communications provides the media with accurate information pertaining to BNSF's role in an incident as soon as possible and with timely updates. External communications personnel generally serve as the BNSF Public Information Officer (PIO), coordinate with other agencies' PIO(s), and take part in the Joint Information Center (JIC). External Communications also develops media messaging, press releases, and other media-specific communications.
- Public/Tribal Affairs: BNSF's Corporate Relations and Tribal Relations personnel coordinate with BNSF officials on-scene and serve as liaison to federal, provincial, state, local, and/or tribal officials, as appropriate. Corporate and/or Tribal Relations personnel may also handle media inquiries as needed on the ground.

# 5.4 Evacuations and Site Security

In the event of a spill requiring facility or area evacuation, BNSF personnel establish, in conjunction with local law enforcement agencies, initial security and limit access into the incident area utilizing other on-duty railroad personnel as needed until civil law enforcement agencies can assume area security. BNSF Resource Protection personnel then provide liaison with the civil law enforcement agencies and help maintain area security.

The decision to evacuate personnel from railroad property is generally made by the railroad supervisor in charge based on U.S. Department of Transportation (DOT) Emergency Response Guidebook evacuation information. Decisions to evacuate beyond railroad property are made by civil response officers (i.e., Fire Chief) and such evacuation is under the jurisdiction of that civil authority.

The BNSF Resource Protection Department provides security in BNSF facilities and patrols BNSF yards periodically. All BNSF personnel, including Resource Protection personnel, are

required to contact the BNSF Service Interruption Desk (SID) if any indication of a spill is observed, or if the security at the facility has been breached.

# 5.5 Spill Assessment and Tracking

Subsequent to notifications, spill assessment and tracking are additional tasks identified in the Checklist under Initial Response Actions. Spill assessment and tracking are used to help confirm response operations are commensurate with the potential of the situation and are likely to be conducted by initial personnel on-scene and continued by response personnel. Spill assessment and tracking tasks requiring field data collection or field verification efforts are undertaken after initial health and safety considerations are developed and integrated into the response.

Checklist tasks specific to spill assessment and tracking include (among other items) the determination of:

- Product type and potential spill volume
- Environmental conditions
- Trajectory.

### 5.6 Air Monitoring

A release of hazmat to the environment may pose a risk to human health and the environment. While significant releases occur infrequently, they potentially could occur anywhere along BNSF's track network. If needed, BNSF collects air monitoring data surrounding hazmat incidents for the determination of the potential for impacts to nearby communities, as well as emergency responders.

Air monitoring equipment and trained, qualified air monitoring scientists are mobilized as soon as possible to monitor and maintain public and worker potential air exposures. BNSF and its lead toxicology contractor have established the BNSF Tactical Toxicology Program (TacTox) as a means of providing enhanced protection for its workers and the communities it serves in the event of a release of hazmat to the environment.

TacTox was designed to enhance the response and management of hazmat releases by refining air monitoring capabilities and establish a network of BNSF environmental contractors trained to conduct air monitoring, air modeling, and emergency toxicology services. BNSF's air monitoring plan describes the BNSF approach to air monitoring under the TacTox Program implemented by BNSF, including:

- Initial site characterization
- Air monitoring instruments and detection limits for community air monitoring
- Community and worker action levels for airborne constituents and fire smoke
- Approach to data quality and reporting
- Hazard communication to stakeholders
- Determination of protective actions and safe distances for workers and communities as part of the Unified Command.

# 5.7 Identification of Resources at Risk

In addition to addressing potential air quality and public safety impacts through BNSF's air monitoring program, BNSF maintains separate procedures and protocols for the identification of potentially impacted resources.

Whether for environmentally sensitive areas or the identification of other resources potentially at risk (e.g., cultural, socio-economic, life safety), minimizing potential spilled material impacts is an objective common to all spill response efforts or significant threats of spills.

BNSF resource identification tools include:

- ACPs for the EPA Region and/or USCG Sector relevant to an incident.
- Direct contact/engagement with federal, state, tribal, and/or local response/stakeholder agencies and integration of such resources into the Environmental Unit.
- Use of Environmentally Sensitive Area (and other) GIS data contained in the BNSF Environmental Viewer.

In the event of a spill, the Environmental Viewer can be augmented by additional ACP-specific priority resource data, data provided by resource stakeholders, or via credentials to their internal mapping applications.

### 5.8 Protection of Resources at Risk

#### 5.8.1 Geographic Response Plans/Control Point Locations

BNSF may use ACP and/or GRP control point/response strategy data to identify locations where resources potentially at risk may exist, or where response contractors can deploy personnel and equipment to contain a spill, protect resources, etc. Individual response strategy sheets generally contain description(s) of equipment and/or personnel necessary to implement a particular strategy at a particular location.

BNSF continues to evaluate areas where additional GRP and/or control point development may be warranted or is being completed by others.

For incidents at locations where response strategies have not been developed, BNSF can implement a variety of shoreline resources and considerations to set priorities and make informed decisions. These types of resources and considerations include (but are not limited to):

- Shoreline Type Mapping
- Shoreline Countermeasures Matrices
- Habitat Factsheets.

#### 5.8.2 Strategy Implementation Tactics

In general, tactical strategies for the protection of vulnerable resources generally involve the use of containment, diversion, and exclusion booming objectives and spilled material collection:

- Containment boom is deployed to contain a floating spill and prevent its migration. This
  requires the placement of boom in a body of water in front of the oncoming spill mass.
  Containment boom is usually first placed around the spill source to limit the spread of
  spilled material. The ends of the boom are anchored onshore or in open water.
  Containment boom can also be used to encircle or otherwise entrap the floating spill
  body so it can be recovered or removed.
- Diversion/Deflection: Diversion boom directs spilled material <u>toward</u> a desirable recovery site whereas deflection boom deflects the floating spill body <u>away</u> from a bank. Deflection/diversion boom placed at an angle across a moving waterbody is a suitable option when strong currents are present that may make containment otherwise impossible.
  - Entrainment or loss of spilled material under the boom can occur when a boom is placed perpendicular to a current of more than about 1 mile per hour. Angling the boom has the net effect of deflecting or diverting the floating spill to, or away from, banks where currents may be less severe.
  - A cascade set of deflection booms or staggered chevron boom configurations can be used to remove, intercept, or move a floating spill body in areas with strong currents, channel obstructions, or meanders. Several booms can be deployed in this configuration when a single boom cannot be used because of fast currents or because of the need to leave navigational openings. Shorter sections of boom, when used in a cascade or chevron deployment, are easier to handle in faster water. Additional equipment is required to set and maintain this system in comparison to the single boom configuration.
- Exclusion booming is deployed across or around sensitive areas such as marshlands, water intakes, and shorelines, thereby forming a protective barrier. Exclusion boom is most efficient in low current areas.

The types of boom used, and techniques used to deploy boom or perform collection, vary significantly depending on spilled material characteristics and site conditions. The information contained above includes only general guidelines and topical coverage. Additional agency and industry resources on these topics are available from multiple sources including relevant ACPs.

### 5.8.3 Procedure for Obtaining Approval for Use of In-situ Burning and Dispersants/Other Chemicals (if applicable)

Relevant ACPs are also used as necessary to address the use of alternative response strategies such as in situ burning and/or use of dispersants or other chemicals. U.S. Regional Response Teams (RRTs) may preauthorize or prohibit the use of dispersants in the waters of their region. Most of the RRTs have established preauthorized zones for dispersant use. During an incident, the Federal OSC has the authority to approve alternative response strategies in consultation with the RRT made up of federal, state, and/or local members.

# Section 6: Ongoing Response Actions

Section 6 describes tasks generally undertaken after initial response actions have been initiated or as the emergency phase of the spill begins to close. These include (but may not be limited to) wildlife response, groundwater assessment, waste management, claims resolution, and post-spill review tasks.

The following sections describe these tasks and the BNSF resources available to address them. Depending on the location, magnitude, and other spill-specific characteristics, some tasks are not warranted in every instance and are to be implemented as appropriate to aid in addressing incident objectives as determined by the Incident Commander or through Unified Command.

### 6.1 Wildlife Response

If wildlife are impacted or are at risk of impacts from a spill, the Wildlife Branch is activated as part of the ICS Operations Section. Wildlife operations are carried out in accordance with state and federal requirements, including those contained in applicable ACP(s).

BNSF maintains contracts with the OWCN to act as a "Wildlife Response Service Provider". BNSF also has direct access to Focus Wildlife, another such provider, through its OSROs. These organizations provide trained wildlife handlers that have both federal and state-specific rehabilitation permits and oil spill-specific federal permits to handle oiled wildlife. Table 6-A lists these and other service providers available to BNSF.

Table 6-A: Wildlife Rescue and Rehabilitation Contractor				
Resource	Capability	Contact Information		
OWCN	Wildlife Response Service Provider, trained wildlife response personnel, oiled wildlife response equipment and supplies	877-823-6926		
Focus Wildlife	Trained wildlife response personnel, oiled wildlife response equipment and supplies	301-386-5965		
Clean Rivers Cooperative	Wildlife response trailers and tents; trained wildlife responders (via OWCN and Focus Wildlife)	503-220-2040		
MSRC	Wildlife response trailers	703-326-5600		

### 6.2 Waste Management

The collection, storage, transport, treatment, and disposal of wastes generated during a spill cleanup can require a significant logistics effort and must be managed in compliance with local, state, and federal regulations. Whenever possible, BNSF attempts to recycle commodities recovered and materials generated during response efforts to reduce waste quantities. Materials which cannot be recycled may include both hazardous and non-hazardous wastes such as oily debris, oiled material (such as sorbent and boom, contaminated PPE, contaminated soil, oil/water mixes), and non-oiled waste from staff support and logistics.

• BNSF has contracted with consultants/disposal company(s) to coordinate all nonhazardous waste disposals.

- The disposal of hazardous waste requires specialized training in profiling, manifesting, and recordkeeping.
  - Per BNSF procedures, the disposal of hazardous waste from emergency response or remediation activities should be coordinated through the BNSF Manager Environmental Remediation or Manager Environmental Operations.
  - All BNSF staff and consultants/contractors involved in the management, transportation, and disposal of hazardous waste are required to have training in accordance with 40 CFR Part 262 (or respective state regulation) and 49 CFR Part 172.

BNSF prepares waste management plans to describe the details of how waste is to be managed and how the entire volume of recovered spill material and associated wastes is tracked and accounted for over the course of the response effort. The plan covers all aspects of waste management including regulatory compliance, quantities and types of waste, waste minimization and segregation, temporary and interim storage, transport, and disposal arrangements.

# 6.3 Claims

Upon notification of an event, the BNSF Claims Department (BNSF Claims) assembles personnel and resources depending on the location and nature of the incident. BNSF Claims representatives first deploy locally and subsequently cascade to a regional or national scope depending on the type of the incident and the corresponding expected resource needs.

BNSF Claims communicates and coordinates with BNSF Corporate Relations, Public Affairs, Government Affairs, Law, and/or other departments. Through coordination with these groups and Incident Command, BNSF Claims:

- Uses various social and traditional media resources (X, Facebook, television, radio, newspaper, etc.) based on the type and location of the event and local media resources available.
- Works with local law enforcement to protect the immediate safety of the community through evacuation and shelter in place methods. Established local/regional points of contact, a telephone hotline number, and/or designated email address or website may also need to be communicated depending on the nature of the response, nature of the incident, and potential community impact.
- Working through the Incident Command, BNSF Claims coordinates with local, tribal, state, provincial, and/or federal agencies to confirm that affected community members are reasonably accommodated in the event of an evacuation.
- Responds to and investigates claims related to the incident as they are presented.
- Clearly communicates established points of contact along with instructions for the handling of any potential claims including establishing a local Claims Processing Center, if necessary.

# 6.4 Incident Termination / Post-Spill Review

Systematic procedures for terminating a hazmat incident should be enacted to facilitate any remaining cleanup or restoration actions that are required. BNSF's termination procedures generally focus on:

- Proper decontamination of personnel and equipment to eliminate the potential for contamination to be conveyed off-site.
- Proper handling, documentation, and disposal of all waste materials and products resulting from the incident or generated by the response activities.
- Site restoration and rehabilitation measures which address damages caused by the incident or response activities. Typically, final clean-up is a negotiated position with regulatory agencies.
- Medical surveillance, as necessary, to confirm response personnel are examined as part of the termination phase to document the potential for health effects related to the incident.

BNSF conducts and documents post-spill assessments and debriefings with participating parties/organizations. This assessment generally addresses questions such as:

- Procedures Were adequate or correct orders given and actions taken? Were these the result of sufficient information, good judgment, and procedures? Can procedures or training be improved?
- Communication Was communication adequate? Was contact with appropriate resources readily available?
- Involvement Were responders sufficiently or properly involved in managing the response?
- Equipment Was the hazmat equipment (BNSF- and/or contractor-provided) adequate? Are changes necessary?
- Contractors Were the hazmat contractors adequate? Are changes necessary?

If deficiencies are identified during the assessment, appropriate follow-up actions are implemented to improve future response preparedness.

# 6.5 Site Remediation / Closure

Though an incident may have been terminated and the IMT, OSCs, and responders have demobilized back to their home bases, the site of a hazmat incident is not closed until it has been remediated. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended with the Superfund Amendments and Reauthorization Act (SARA), establishes a mechanism for the immediate and subsequent long-term cleanup of contamination from accidental spills and chemical releases and helps drive the final site remediation phase and defines when a site can actually be considered closed.

Supporting this process, BNSF identifies, documents, and records relevant environmental data before, during, and after the response. These data are used to generate an understanding of the vertical and horizontal extent of potential contamination, along with a risk assessment and a feasibility study. These data and reports are then used to negotiate subsequent cleanup criteria, remedies, and final cleanup approach with the applicable federal, state, local, and/or tribal authority(s).

### 7.1 Training

This section describes BNSF's emergency response training programs that serve to maintain response readiness and the ability to respond to spills quickly, safely, and effectively.

### 7.1.1 IMT Training

BNSF maintains an Incident Management and Response Personnel Team training schedule. BNSF employees and contracted IMT members assigned to the IMT receive training prior to being placed into critical ICS positions and/or have ICS trained deputies to support them.

BNSF QIs receive QI and ICS 100, 200, 300, 700, and 800 training; team training (ICS 220 and 320); and ICS position training (ICS 310, 430, 440) for Incident Commander, Operations Section Chief, and Planning Section Chief Level(s).

### 7.1.2 BNSF-Employed Responder Training

BNSF-employed responders are trained to meet applicable federal and state HAZWOPER requirements as discussed in Section 5.2. Additional training required for BNSF's HMERT personnel was discussed in Section 3.4.

### 7.1.3 Response Contractor Training

Response Contractor personnel are trained and qualified to the level of response duties performed. BNSF regularly conducts boom deployment training with OSROs and agencies at locations across its system in various waterways and terrain.

Additionally, BNSF Response Contractors maintain listings of qualified personnel available to support response operations, including documentation of trainings performed and attended. Response Contractor personnel who are responsible for operating spill response equipment receive hands-on training in the actual deployment and operation of equipment and vessels. Response Contractors may perform their hands-on training classes in conjunction with the deployment of their equipment.

BNSF requires all Response Contractors to provide HAZWOPER training to their personnel. This training documentation is maintained by each Response Contractor and is provided to BNSF upon request.

### 7.1.4 Community Training

BNSF's Hazmat Team has a strong commitment to training local responders on hazmat awareness and emergency response. BNSF wants to ensure that we can work with communities and respond quickly in the unlikely event that a hazmat emergency occurs.

BNSF's community training focuses on identifying and training fire departments and emergency responders in smaller communities along relevant rail lines, areas where trained emergency

responders are less common. Through this program, BNSF trains approximately 6,000 responders per year.

### 7.2 Drills and Exercises

Drills and exercises are designed to provide response personnel with an opportunity to apply training, test and evaluate response plans, and learn from previously held exercises and actual spill events. BNSF uses National Preparedness for Response Exercise Program (PREP) Guidelines for all its exercise programs.

Table 7-A provides an outline of the types of exercises and frequency requirements as outlined by PREP guidelines for DOT/ PHMSA-regulated 'facilities' applicable to BNSF under the COSRP Final Rule. Additional exercise matrices are required for BNSF facilities regulated by the EPA and other states/provinces.

BNSF tracks exercise progress over a 3-year triennial cycle using an exercise tracking matrix and has adopted PREP guidelines to assist in meeting the requirements of the exercise program.

Table 7-A: BNSF DOT/PHMSA Exercise Matrix						
Type of Exercise	Frequency of Exercise	Instruction for scheduling				
Table Top Exercise	One annually					
Deployment Exercise	Annually. BNSF relies on OSRO- owned equipment. OSROs are required to conduct and maintain all documentation regarding training, equipment deployment exercises, equipment inspections, and testing in accordance with manufacturer's minimum recommendations (including the methods used).	Plan holders are encouraged to notify their DOT/PHMSA regional office at least one month in advance of conducting their PREP exercises. When possible, DOT/PHMSA participates in and/or evaluate their exercise.				
Worst-case Table Top Exercise	Once every 3 years, within a triennial cycle					
Qualified Individual Notification Exercises (one after-hours/year)	Quarterly	NA				
Unannounced Exercise Table Top or Deployment	Once annually	An Unannounced Government-Initiated Exercise or an actual spill event, if properly documented, may meet the annual unannounced exercise requirement.				

Components to be tested during the triennial cycle include the 15 PREP Core Components listed in Table 7-B.

Table 7-B: PREP Core Components					
	PREP Component	PREP Description			
1.	Notifications	Test the notifications procedures identified in the response plan being exercised.			
2.	Staff Mobilization	Demonstrate the ability to assemble the Incident Management Organization identified in the response plan being exercised. [And establish the Incident Command Post.]			
3.	Ability to operate within	Unified Command – Demonstrate the ability of the Incident Management Organization to work within a Unified Command.			
	the response management system described in the plan	Response Management System – Demonstrate the ability of the Incident Management Organization to operate within the framework of the response management system identified in their respective plans.			
4.	Source/Discharge Control	Demonstrate the ability of the Incident Management Organization to control and stop the discharge at the source, and to effectively coordinate source control activities within the response management system used for the overall incident.			
5.	Assessment	Demonstrate the ability of the Incident Management Organization to provide an initial assessment of the discharge or potential discharge and provide continuing assessments of the effectiveness of the tactical planning.			
6.	Containment	Demonstrate the ability of the Incident Management Organization to contain the discharge at the source or in various locations for recovery operations.			
7.	Mitigation/Recovery	Demonstrate the ability of the Incident Management Organization to mitigate the discharged product through the use of spill countermeasures, including, but not limited to, dispersants, in-situ burning, and bioremediation, in addition to mechanical recovery.			
8.	Protection	Demonstrate the ability of the Incident Management Organization to protect the environmentally and economically sensitive areas identified in the industry response plan.			
9.	Disposal	Demonstrate the ability of the Incident Management Organization to dispose of the recovered material and contaminated debris.			
10.	Communications	Demonstrate the ability to establish an effective communications system for the Incident Management Organization.			
11.	Transportation	Demonstrate the ability to provide effective multimode transportation, both for execution of the discharge and support functions.			
12.	Personnel Support	Demonstrate the ability to provide the necessary support of all personnel associated with the response.			
13.	Equipment Maintenance and Support	Demonstrate the ability to maintain and support all equipment associated with the response.			
14.	Procurement	Demonstrate the ability to establish an effective procurement system.			
15.	Documentation	Demonstrate the ability of the Incident Management Organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken.			

BNSF is committed to inviting agencies with jurisdictional authority and key stakeholders to observe and/or participate in its exercises.

### Acronyms

ACP	Area Contingency Plan
DAI	Best Achievable Technology
BINSE	BNSF Railway Company
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COSRP	Comprehensive Oil Spill Response Plan
CPKC	The Soo Line Railroad Company, Dakota, Minnesota & Eastern Railroad
	Corporation, Delaware and Hudson Railway Company, Inc., Central Maine &
	Quebec Railway US Inc., and The Kansas City Southern Railway Company, all
0.14	each and together operating as "CPKC"
CWA	Clean Water Act
DOI	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
ERAP	Emergency Response Action Plan
FRP	Facility Response Plan
GIS	Geographic Information System
GRP	Geographic Response Plan
hazmat	Hazardous Material
HMERT	Hazardous Material Emergency Response Team
ICS	Incident Command System
IMT	Incident Management Team
JIC	Joint Information Center
LERP	Local Emergency Response Plan
MSRC	Marine Spill Response Corporation
NCP	National Contingency Plan
NIMS	National Incident Management System
OPA	Oil Pollution Act
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSRP	Oil Spill Response Plan
OSRO	Oil Spill Removal Organization
OWCN	Oiled Wildlife Care Network
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIO	Public Information Officer
PPE	Personal Protective Equipment
PREP	National Preparedness for Response Exercise Program
QI	Qualified Individual
RCP	Regional Contingency Plan
RRT	U.S. Regional Response Team
RZP	Response Zone Plan
SARA	Superfund Amendments and Reauthorization Act
SERP	System Hazardous Materials Emergency Response Plan
SID	Service Interruption Desk
TacTox	Tactical Toxicology Program
UAV	Unmanned Aerial Vehicles

U.S.	United States
USCG	U.S. Coast Guard
WCD	Worst-Case Discharge

# **Figures**

Figure 1 – BNSF-Owned Oil Spill Response Trailer Locations
Figure 2 – BNSF-Owned Industrial Fire-Fighting Trailer Locations
Figure 3 – BNSF-Owned Wildland Fire-Fighting Trailer Locations
Figure 4 – BNSF-Owned Breathing Air Trailer Locations
Figure 5 – BNSF-Owned Tank Car Capping Kit Locations
Figure 6 – BNSF-Owned Incident Command Asset Locations
Figure 7 – BNSF-Owned ICS/Communications Trailer Locations
Figure 8 – BNSF-Owned Training Trailer and Training Car Locations



### Figure 1 – BNSF-Owned Oil Spill Response Trailer Locations



#### Equipment typically found in Oil Spill Trailers:

Boom, skimmer and power pack, absorbents, collapsible tanks, personal protective equipment (gloves, waders, helmets, safety vests, etc.), miscellaneous tools, buoys, anchors, rigging, suits (rain, chemical, etc.).





Figure 2 – BNSF-Owned Industrial Fire-Fighting Trailer Locations





#### Equipment typically found in Industrial Fire Fighting Trailers:

Monitor(s), pump(s), fire-fighting foam, portable water tank, hoses, nozzles, fittings, miscellaneous tools.



#### Figure 3 – BNSF-Owned Wildland Fire-Fighting Trailer Locations





#### Equipment typically found in Wildland Fire Fighting Trailers:

Monitor(s), pump(s), firefighting foam, nozzles, chainsaw(s), portable water tank, shelters, fire suits, personal protective equipment, fittings, miscellaneous tools.



#### Figure 4 – BNSF-Owned Breathing Air Trailer Locations





# Equipment typically found in Breathing Air Trailers:

Air respirators, air cylinders, protective suits, personal protective equipment (gloves, safety vests, ear plugs, etc.), handheld radios, miscellaneous tools.



### Figure 5 – BNSF-Owned Tank Car Capping Kit Locations







#### Equipment typically found in Tank Car Capping Kit:

Gaskets, O-rings, socket sets, wrenches, nuts, bolt cutters, miscellaneous tools.











#### Incident Command Assets typically provide:

Mobile command posts with meeting space, generator(s), tables, chairs, and/or other general office amenities.







# Equipment typically found in ICS/Communications Trailer:

Radios, modem/router, batteries, printer, command vests, generators, antenna, signal booster, table, chairs.



### Figure 8 – BNSF-Owned Training Trailer and Training Car Locations



#### **Training Trailers:**

Contains training props and supporting materials such as housing assemblies, air compressor, capping kits, generator, hoses, safety suits.

#### **Training Cars:**

BNSF maintains and stages 'Training Cars' in its rail network as in-field classrooms for handson Tank Car training and simulations. Training cars generally contain example valve housings and configurations, training props, supporting materials, and A/V equipment.