

## Vulnerability Analysis Expanded Capabilities in Spill Response

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A vulnerability analysis is required under 40 CFR Part 112, Appendix F, Section 1.4.2 to identify the potential impacts of an oil discharge at those facilities required to maintain a Facility Response Plan (FRP). This includes completing a substantial harm evaluation, worst case discharge analysis, and planning distance for potential impacts to sensitive areas indicated below.

Water intakes (drinking, cooling, or other)

Schools

Medical facilities

Residential areas

Businesses

Wetlands or other sensitive environments

Fish and wildlife

Lakes and streams

Endangered flora and fauna

Recreational areas

Transportation routes

Utilities

Other areas of economic importance including terrestrially sensitive environments, aquatic environments, and unique habitats

Normally, because this is an analysis used to plan the response, this information is incorporated into the FRP. Because the FRPs and Emergency Response Action Plans are voluminous to meet the regulatory mandates, CSXT decided that the information is sufficiently valuable that it provides a good resource during an incident. This information is incorporated into a standalone document that also includes drawings of the worst case discharge impact zone, potential drainage pathways, planning distances, and response times along these pathways. The sensitive areas are identified on the drawings to allow facility personnel and/or first responders to plan response measures effectively. This document was used during annual training exercises to better prepare for actual spill response actions. The vulnerability analysis provides the necessary information for planning effective countermeasures to an oil discharge. This presentation will detail the process for developing a vulnerability analysis and describe the value it provides the facility as a standalone document, as well as the benefits of using this analysis for enhancing facility preparedness to an oil spill.