

Does Your Rail Yard Really Need a Facility Response Plan?

James Cunningham, BNSF Railway
Peter T. Masson, Conestoga-Rovers & Associates



- A Facility Response Plan is a plan for responding, to the ***maximum extent practicable***, to a worse case discharge, and to a substantial threat of such a discharge, of oil.

What is a Facility Response Plan?

- Does your facility have a total storage capacity greater than or equal to 1,000,000 gallons of oil?
- You may need a Facility Response Plan under 40 CFR 112.

When is a Facility Response Plan needed?

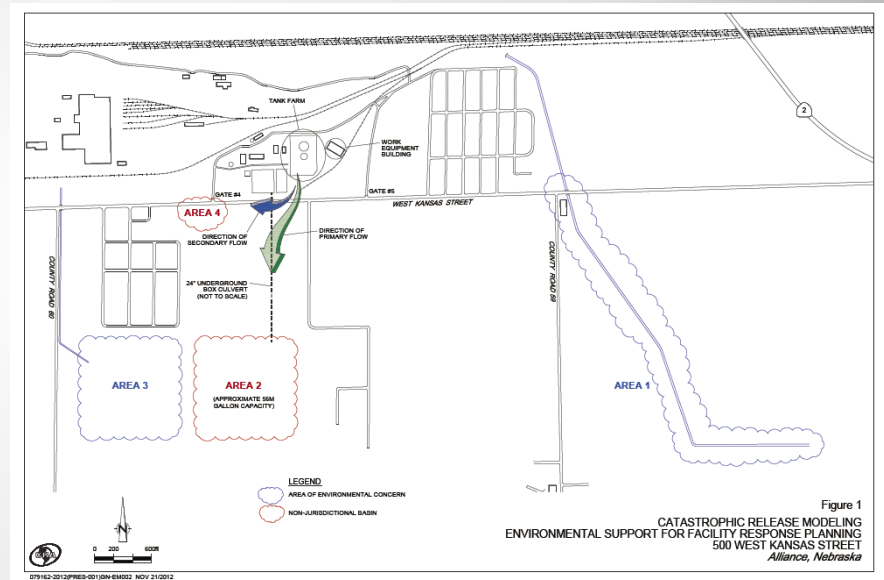


BNSF's Facility Response Plan development

- Is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
- Is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
- Has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?

Do you always need a Facility Response Plan?

- Wetland survey
- Topographic survey
- 40 CFR Part 112 Appendix C Attachment C-III flow model

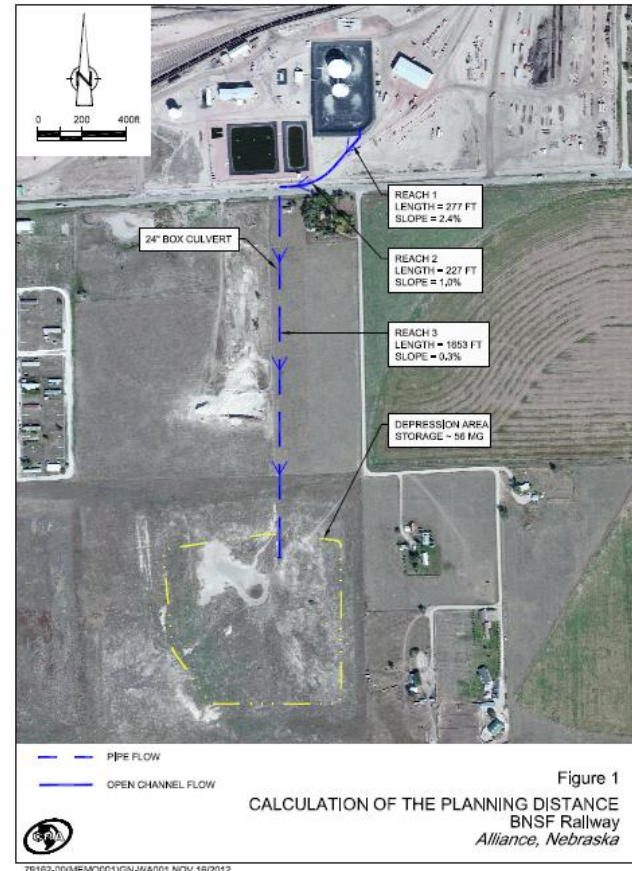


Modeling where the release might go



Alliance, NE: No FRP needed

- Sensitive resources present but not impacted
- No drinking water intake
- No previous release
- So no FRP required



Alliance, NE: No FRP needed



Guernsey, WY: FRP needed

- Impact to sensitive resources
- Potential to impact drinking water resources
- No previous release



Guernsey, WY: FRP needed

- FRP needed
- Modeling shows where to place engineered controls



Legend

- Discharge Point
- Culverts
- Storage Area
- Drainage Pathway
- Tank Area

Figure 2
STORAGE CAPACITY
BNSF RAILWAY
Guernsey, Wyoming

Guernsey, WY: FRP needed



Barstow, CA: No FRP needed

- No sensitive resources present
- No drinking water intake
- No previous release

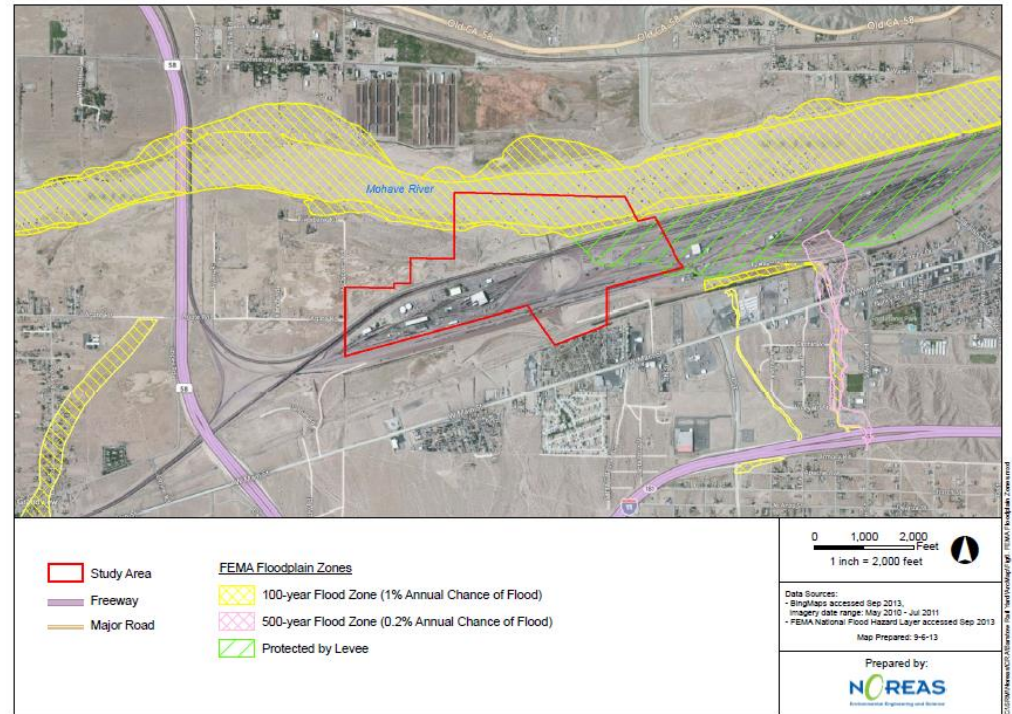


Figure 6. FEMA 100-Year Flood Zone

Barstow, CA: No FRP needed

Obligations:

- Still need SPCC planning
- Still have to respond to release
- Still need to maintain facility and equipment

Benefits:

- No need to comply with FRP maintenance requirements
- Saves money from exercises/inspections
- Even if still need FRP, better understanding of release

So why ask?

James Cunningham

James.Cunningham@BNSF.com

402-458-7633

Peter T Masson

pmasson@CRAworld.com

510-459-5226

Contact

