SUMMIT CARBON SOLUTIONS

Draft South Dakota Emergency Response Plan

Revision: 0

8/30/2023

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1   ACRONYMS

Acronym	Description
ACGIH	American Conference of Governmental Industrial Hygienists
AOC	Abnormal Operating Conditions
CFR	Code of Federal Regulations
CST	Company Support Team
CO2	Carbon Dioxide
FOSC	Federal On-Scene Coordinator
IAP	Incident Action Plan
IC	Incident Commander
ICP	Incident Command Post
ICS	Incident Command System
IDLH	Immediately Dangerous to Life and Health
LOSC	Local On-Scene Coordinator
LRT	Local Response Team
MCE	Midwest Carbon Express
NIOSH	National Institute of Occupational Safety and Health
NRC	National Response Center
O2	Oxygen
OQ	Operator Qualification
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
PHMSA	Pipeline and Hazardous Materials Administration
PSAP	Public Safety Answering Point
psi	pounds per square inch
QI	Qualified Individual
SCS	Summit Carbon Solutions
SOSC	State On-Scene Coordinator
SPA	Single point accountability
UC	Unified Command

Figure 1 - Acronyms

2 GLOSSARY OF TERMS

Term	Description
Agency Personnel	Agency personnel refers to local, county, state, and/or federal employees, contractors, or businesses employed by governmental entities.
Blowdown	The act of releasing gas from the pipeline system so work can be done safely on the depressurized facilities.
Controlled Release	Often occurs due to safety reasons surrounding facility design, or intentional venting to perform maintenance or inspection of equipment.
Immediately Dangerous to Life and Health (IDLH)	The National Institute of Occupational Safety and Health (NIOSH) defines an IDLH condition as a situation "that poses a threat of exposure to airborne contaminants when that exposure is likely to cause death or immediate or delayed permanent adverse health effects or prevent escape from such an environment". The IDLH limit represents the concentration of a chemical in the air to which healthy adult workers could be exposed (if their respirators fail) without suffering permanent or escape-impairing health effects.
Unintentional Release	A release caused by equipment leaks, defective seals, damaged pipeline, or other abnormal operating conditions.

Figure 2 - Glossary

3 PURPOSE

This Emergency Response Plan (ERP or Plan) is for the Midwest Carbon Express (MCE) pipeline system operated by SCS Carbon Transport, (SCS or Company) located in South Dakota. The purpose of the ERP is to provide guidance for quick, safe, and effective response to an emergency to protect the public, all responders, SCS personnel, and the environment.

4 SCOPE OF THE PLAN

This plan has been developed to meet the requirements of 49 Code of Federal Regulations (CFR) 195.402(e) and is intended to cover incidents that could occur along the pipeline system.

This Plan is intended to provide the necessary information for pre-emergency planning as well as procedures for Company personnel to respond to and mitigate incidents during an emergency. A description of the pipeline system operations is included in Figure 3. Response procedures and guidelines are provided in Section 6 of this plan.

General Pipeline System Information	
Pipeline Name:	Midwest Carbon Express
Operator Name:	SCS Carbon Transport, LLC
Operator Address:	
Mainline Number	24-hour Emergency: [TBD before system startup] Corporate Headquarters: 515-531-2635
Qualified Individual(s):	Director, Regulatory Compliance (see Section 5 for contact information)
States Traversed:	Minnesota, North Dakota, South Dakota, Nebraska, Iowa
Pipeline Description	
The Summit Carbon Solutions Midwest Carbon Express pipeline will consist of approximately 2,000 miles of a high-strength carbon steel comprised of 4- to 24-inch diameter pipe. The pipeline will be operated with a maximum operating pressure of 2,183 pounds per square inch (psi and the CO_2 will be maintained in a dense phase or supercritical state during normal operations.	
Product Description	
CO_2 is naturally occurring in the atmosphere, used in the food and beverage industry, and produced by the human body during ordinary respiration, so it is commonly perceived by the general public to be a relatively harmless gas. However, at concentrations of 4% by volume (40,000 parts per million [ppm]), CO_2 is Immediately Dangerous to Life or Health (IDLH), and at concentrations of 8% by volume (80,000 ppm) can cause dimmed sight, sweating, tremor, unconsciousness, and possible death by asphyxiation.[1] Because CO_2 is colorless, odorless, and heavier than air, a significant uncontrolled release may cause CO_2 to temporarily accumulate near the ground in low lying outdoor areas, and in confined spaces such as caverns, tunnels, and basements until it dissipates into the atmosphere. CO_2 is not flammable, combustible, or explosive.	

Figure 3 - General Pipeline System

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[1] https://www.fsis.usda.gov/sites/default/files/media_file/2020-08/Carbon-Dioxide.pdf

5 RESPONSE TEAMS

5.1 Introduction

This section describes organizational features and duties of the Company's Qualified Individual (QI), Local Response Team (LRT), and Company Support Team (CST). The Company's initial response to an incident will be provided by the LRT, once activated by the QI. The Incident Commander will activate a Company Support Team if an incident exceeds the local capabilities. In some cases, the initial responders to an incident may include local law enforcement and/or local fire department(s). SCS will work with these agencies to manage a coordinated response effort.

The National Incident Management System (NIMS) Incident Command System (ICS) will be used to manage emergency response activities. Because ICS is a management tool that is readily adaptable to incidents of varying magnitude, it will be used for all emergency incidents. Staffing levels will be adjusted to meet specific response team needs based on incident size, severity, and type of emergency. Local agencies are also trained on using ICS and may fill roles during a coordinated response effort. ICS principles include:

- Common Terminology
- Manageable Span of Control
- Management by Objectives
- Incident Action Planning
- Comprehensive Resource Management
- Established Incident Facilities
- Integrated Communications

As a component of an ICS, the Unified Command (UC) is a structure that brings together the responsible party (i.e., SCS) and agencies at the command level. The UC links the organizations responding to the incident and provides a forum for the responsible party and responding agencies to make consensus decisions. Under the UC, the various responding agencies and company personnel may blend together throughout the organization to create an integrated response team. The ICS process requires the UC to set clear objectives to guide the on-scene response resources. The primary entities of a UC may be two or more of the following:

- Federal On-Scene Coordinator
- State On-Scene Coordinator
- Local On-Scene Coordinator
- Company Incident Commander (Responsible Party IC)

5.2 Qualified Individual

The Qualified Individual (QI) is defined by PHMSA as a company employee that has been given authority to fund response efforts without consulting Company leadership for further authorization and knows how to commence the response procedures of this Plan. The QI is responsible for activating the ICS response organization, including the LRT and CST.

The QI will be an English-speaking SCS employee that is available on a 24-hour basis with the full authority to activate and deploy the necessary emergency response contractors. The QI or Alternate QI will activate personnel and equipment, act as a liaison with the UC, and obligate any funds required to carry out all the required or direct emergency response activities.

5.3   Local Response Team

The first Company person on scene will function as the Incident Commander (IC) and person-in-charge until relieved by an authorized person who will then assume the position of IC. The number of positions/personnel required to staff the LRT will depend on the size and complexity of the incident. The duties of each position may be performed by the IC directly or delegated as the situation demands. The IC is always responsible for directing response activities and will assume the duties of all the primary positions until the duties can be delegated to other qualified personnel.

A typical ICS organization is shown in Figure 4. The LRT will fill the necessary positions and request additional support from the Company Support Team to fill/back up any additional positions necessitated by the incident. Detailed job descriptions of the response team positions are provided in this Section.

5.4   Company Support Team

For response operations outside of the capabilities of the LRT, the QI and IC will determine the need for mobilization of a CST. The members of the LRT will typically become members of the CST.

The CST, once fully staffed, is designed to cover all aspects of a comprehensive and prolonged incident response. The number of positions/personnel required to staff the CST will depend on the size and complexity of the incident. During a prolonged response, additional personnel may be cascaded in to fill additional ICS positions or relieve responding personnel.

The CST is staffed by trained personnel from various Company locations and by various contract resources as the situation requires.
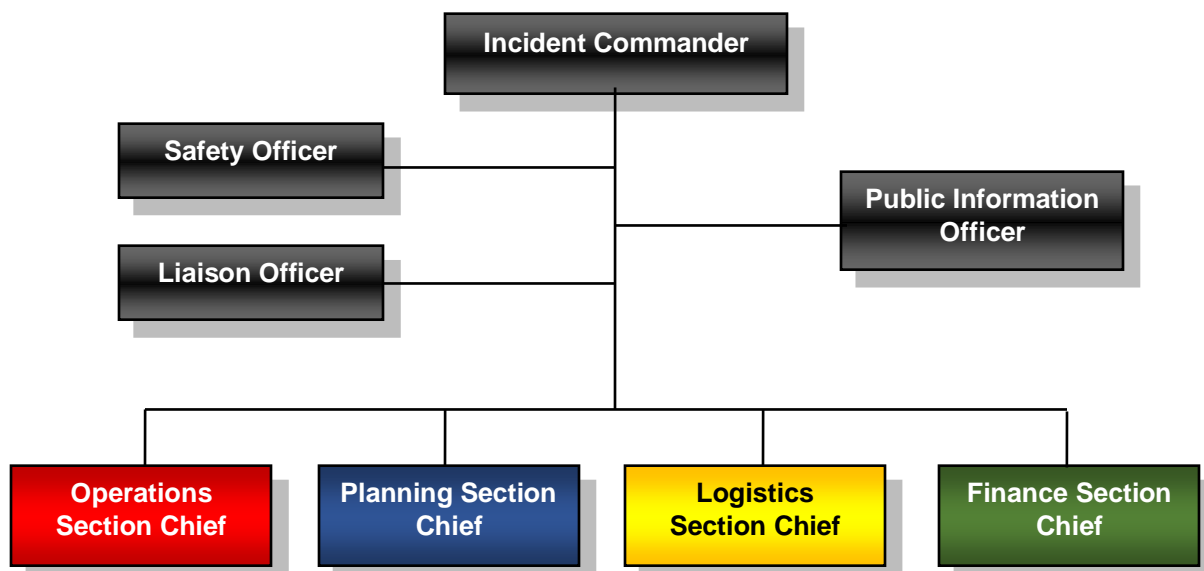

Figure 4 - Incident Command System Organization

5.5 Incident Command System Roles and Responsibilities

Incident Commander	
The IC has responsibility for overall management of the incident. The IC has the authority to approve the use of a contractor even if no "open-end" contract exists, as well as the authority to commit monies to initiate response and clean-up activities. The first employee on- site will assume the responsibilities of IC until properly relieved. Generally, the most senior employee on-site will assume the IC position. The IC also has overall responsibility for the health and safety of responders.	
○	Assess the situation and/or obtain a briefing from the prior IC.
○	Determine incident objectives and strategy.
○	Establish the immediate priorities.
○	Establish an Incident Command Post (ICP).
○	Brief Command Staff and Section Chiefs.
○	Establish an appropriate response organization commensurate with the severity of the incident and potential for impact to public health and/or the environment
○	Ensure planning meetings are scheduled as required.
○	Approve and authorize the implementation of an Incident Action Plan (IAP).
○	Ensure that adequate safety measures are in place.
○	Coordinate activity for all Command and General Staff.
○	Coordinate with key people and officials
○	Approve requests for additional resources or for the release of resources.
○	Keep appropriate agencies/organizations informed of incident status.
○	Approve the use of trainees, volunteers, and auxiliary personnel.
○	Authorize release of information to the news media
○	Ensure Incident Status Summary (ICS Form 209) is completed and forwarded to appropriate higher authority
○	Order the demobilization of the incident response when appropriate.
Safety Officer	
The Safety Officer's (SOFR) function is to develop and recommend measures for assuring personnel safety, and to assess and/or anticipate hazardous and unsafe situations. Only one SO will be assigned for each incident; however, there may be assistants.	
○	Participate in planning meetings.
○	Identify hazardous situations associated with the incident.
○	Review the IAP for safety implications.
○	Exercise emergency authority to stop and prevent unsafe acts.
○	Investigate accidents that have occurred within the incident area.
○	Review and approve the medical plan.
○	Develop the Site Safety Plan and publish Site Safety Plan summary (ICS Form 208) as required.
Public Information Officer	

The Public Information Officer (PIO) is responsible for developing and releasing information about the incident to the news media, incident personnel, and other appropriate agencies and organizations.

Only one PIO will be assigned for each incident. The PIO may have assistants as necessary. The assistants may represent assisting agencies, companies, or jurisdictions. The PIO and assistants will establish a Joint Information Center to assist with developing information releases.

○	Determine from the IC if there are any limits on information release.
○	Develop material for use in media briefings.
○	Obtain IC approval of media releases.
○	Inform media and conduct media briefings.
○	Arrange for tours and other interviews or briefings that may be required.
○	Obtain media information that may be useful to incident planning.
○	Maintain current information summaries and/or displays on the incident and provide information on the status of the incident to assigned personnel.

Liaison Officer

The Liaison Officer (LOFR) serves as a "go-between" linking the IC to various agencies. These are agencies that do not have a direct tactical assignment within the Unified Command but have an interest in the response activities or wish to offer assistance.

The Liaison Officer intercepts, greets, and briefs agency representatives as they arrive on scene. It is the responsibility of the Liaison Officer to notify the IC before escorting anyone to the Command Post. A separate Liaison Area may need to be established to accommodate agency representatives not directly involved in the Unified Command.

○	Be a contact point for Agency Representatives.
○	Maintain a list of assisting and cooperating agencies and Agency Representatives. Monitor check-in sheets daily to ensure that all Agency Representatives are identified.
○	Assist in establishing and coordinating interagency contacts.
○	Keep federal, state, local agencies supporting the incident aware of incident status.
○	Monitor incident operations to identify current or potential inter-organizational problems.
○	Participate in planning meetings, providing current resource status, including limitations and capability of assisting agency resources.
○	Coordinate response resource needs for incident investigation activities with the OPS.
○	Ensure that all required agency forms, reports, and documents are completed prior to demobilization.
○	Coordinate activities of visiting agencies or government officials arriving to survey the response.

Operations Section Chief (OPS)

The Operations Section Chief (OPS) is responsible for the management of all operations directly applicable to the primary mission (i.e., clean-up, recovery etc.). The OPS activates and supervises tactical response elements in accordance with the Incident Action Plan (IAP) and directs its execution. The OPS also requests or releases resources; makes expedient changes to the IAP(as necessary); and reports these actions to the IC.

○	Develop operations portion of IAP.
○	Brief and assign Operations Section personnel in accordance with the IAP.
○	Supervise Operations Section.

○	Determine need and request additional resources.
○	Review suggested list of resources to be released and initiate recommendation for release of resources.
○	Assemble and disassemble Strike Teams assigned to the Operations Section.
○	Report information about special activities, events, and occurrences to the IC.

Planning Section Chief

The Planning Section Chief (PSC) is responsible for the collection, evaluation, dissemination and use of information; particularly with regard to the development of the incident and the status resources. This information is needed to: 1) understand the current situation, 2) predict the probable course of incident events; and 3) prepare alternative strategies for the incident.

○	Collect and process situation information about the incident.
○	Supervise preparation of the IAP.
○	Provide input to the IC and the OPS in preparing the IAP.
○	Chair planning meetings and participate in other meetings as required.
○	Assign available personnel already on-site to ICS organizational positions as appropriate.
○	Establish information requirements and reporting schedules for Planning Section Units (e.g., Resources, Situation Units).
○	Determine the need for any specialized resources in support of the incident.
○	If requested, assemble and disassemble Strike Teams and Task Forces not assigned to Operations.
○	Establish special information collection activities as necessary (e.g., weather, environmental, toxics).
○	Assemble information on alternative strategies to meet response objectives.
○	Provide periodic predictions on incident potential. The incident potential examines the current situation and the potential future situation based on the incident specifics (e.g., adverse weather, potential community impacts, duration of incident response operations, legal concerns, etc.)
○	Report any significant changes in incident status or any Critical Reporting Requirements (CIR) to the Incident Commander. (e.g., injury, public health impacts, special request from agencies, etc.).
○	Compile and display incident status information.
○	Oversee preparation and implementation of the Incident Demobilization Plan.
○	Based on incident severity and site-specific conditions, incorporate ICS forms and plans (e.g., Traffic, Medical ICS 206, Communications ICS 205, Site Safety ICS 208) into the IAP.

Logistics Section Chief

The Logistics Section Chief (LSC) is responsible for providing facilities, services, and material in support of the incident. The LSC participates in the development and implementation of the IAP.

Resources are divided into Support and Services. Support resources are used in support of the IAP (i.e., boom, vacuum trucks, skimmers etc.). Service resources include food/water, communication, and medical resources.

○	Plan the organization of the Logistics Section.
○	Assign work locations and preliminary work tasks to Section personnel.

○	Notify the Resources Unit of the Logistics Section units activated including names and locations of assigned personnel.
○	Assemble and brief Branch Directors and Unit Leaders.
○	Participate in preparation of the IAP.
○	Identify service and support requirements for planned and expected operations
○	Provide input to and review the Communications Plan, Medical Plan and Traffic Plan.
○	Coordinate and process requests for additional resources.
○	Review the IAP and estimate Section needs for the next operational period.
○	Advise on current service and support capabilities.
○	Prepare service and support elements of the IAP.
○	Estimate future service and support requirements.
○	Recommend release of Unit resources in conformity with Incident Demobilization Plan.
○	Ensure the general welfare and safety of Logistics Section personnel.
Finance Section Chief	
The Finance Section Chief (FSC) is responsible for all financial, administrative, and cost analysis aspects of the incident and for supervising members of the Finance Section. Depending on the incident, the FSC position may or may not be assigned. Agencies within the Unified Command may require and staff the FSC position.	
○	Attend planning meetings as required.
○	Manage all financial aspects of an incident.
○	Provide financial and cost analysis information as requested.
○	Gather pertinent information from briefings with responsible agencies.
○	Develop an operating plan for the Finance/Administration Section; fill supply and support needs.
○	Determine the need to set up and operate an incident commissary.
○	Meet with Assisting and Cooperating Agency Representatives, as needed.
○	Ensure that all personnel time records are accurately completed and transmitted, according to policy.
○	Provide financial input to demobilization planning.
○	Ensure that all obligation documents initiated at the incident are properly prepared and completed.
○	Brief administrative personnel on all incident-related financial issues needing attention or follow-up prior to leaving incident.

6 PROCEDURE

6.1 Receiving, Identifying, and Classifying Incidents

Generally, an incident is a chain of events which has caused, or could have caused, injury, illness, and/or damage to the environment or the public. In this Plan, an incident refers to an event requiring some form of action on behalf of the Company. Notification of incidents may occur via phone from external sources (the public or emergency response agencies such as fire or police),

phone from employees or contractors, or operational monitoring by the Pipeline Control Center. Regardless of the source, each incident's relative risk will be continually evaluated and characterized until it has been controlled and resolved. The initial Incident Commander role will be filled by the first Company employee to arrive at the incident scene.

An emergency is defined as an urgent, sudden, and serious event that requires immediate action that may result in harm to employees or the public, environmental degradation, and/or property damage. If an emergency is reported, SCS will shut down the impacted system and make immediate notifications to ensure protection of the public and company personnel.

Incident Classification	
Low Risk	Incidents that will not need to involve outside agencies, such as Police, Fire, etc. Incidents that can be secured by the Pipeline Operations field personnel that do not impact the public or environment. Examples may include: 1. Incipient stage fires addressed with hand-held extinguishers 2. Small spills of fuel, lube oil, or other regulated materials that remain in containment or small releases that disperse immediately into the atmosphere 3. Minor injuries not requiring hospitalization
High Risk	Incidents that require an immediate response by the Pipeline Controller and Pipeline Operations Field personnel, such as: 1. Accidental/uncontrolled release of CO_2 from the pipeline 2. Fire beyond the capabilities of a handheld extinguisher or explosion occurring near or directly involving a pipeline facility 3. Operational failure causing a hazardous condition

Figure 5 - Incident Classification

6.2 Communicating to Appropriate Operator Personnel

Should notification of an event relating to a pipeline leak or potential emergency which requires immediate response be received, the following Emergency Notification Flowchart, located in Figure 6, provides guidance regarding notification of appropriate operator personnel, contractors, emergency, and public officials.
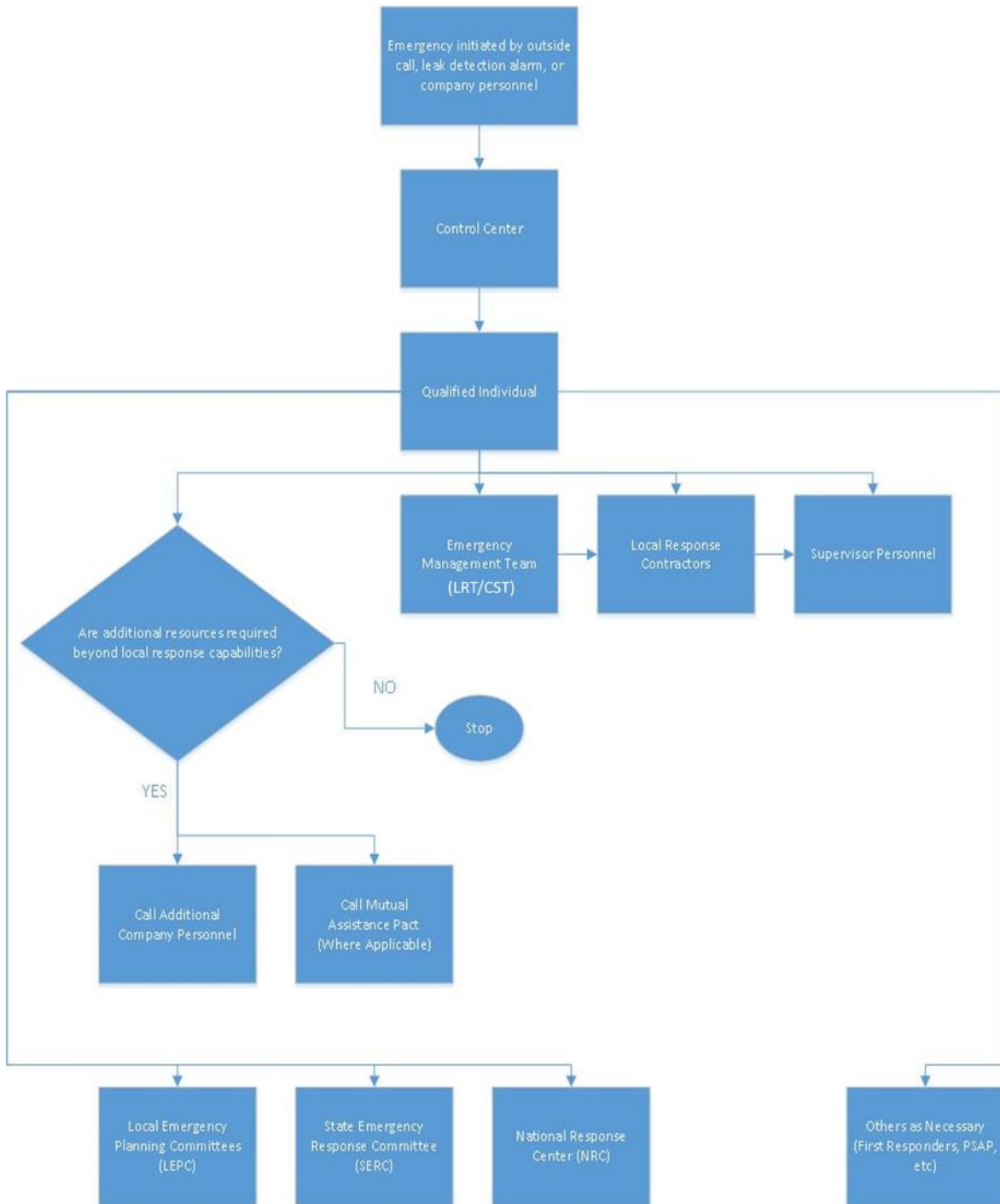
Figure 6 - Emergency Notification Flowchart

6.3 Prompt and Effective Response

A prompt and effective response to each type of incident identified in Section 6 is critical to minimizing any adverse effect to public health, the environment, and property.

- All immediate response events (high risk) identified in Section 6 should be mitigated by shutting down the pipeline segment(s) involved as soon as possible.

- If the notification is taken by the Pipeline Controller, the pipeline segment(s) involved will be shut down immediately.

- Any other individual receiving notification will immediately notify the Pipeline Controller for immediate shutdown of the affected pipeline segment(s).

- The Control Center shall determine the external notification that needs to be made based on the incident type and severity. See Section 8 for PSAP for each county and Section 9 for regulatory notifications, both federal and state, including the public.

Initial response actions are those taken by local personnel immediately upon becoming aware of a discharge or emergency incident before the LRT Team (described in Section 5) is formed and functioning.

The first SCS employee on-scene will function as the IC until properly relieved. The person functioning as the IC during the initial response period has the authority to take the steps necessary to control the situation and must not be constrained by these general guidelines.

6.4 Initial Response Actions

Initial Response Action Checklist	
❑	Take appropriate personal protective measures and utilize CO2 monitoring equipment to ensure public and responder safety, as the situation demands.
❑	Confirm Control Center has been notified.
❑	Call for medical assistance if an injury has occurred.
❑	Restrict access to the incident site and adjacent areas as the situation demands. Take additional steps necessary to minimize any threat to health and safety. Contact local police or fire to assist as needed.
❑	Assess the magnitude of the incident and quantity released.
❑	Advise public/personnel in the area of any potential threat and/or initiate evacuation procedures.
❑	Use testing and sampling equipment to determine potential safety hazards, as the situation demands.
❑	Identify/Isolate the source and minimize the loss of product, as appropriate.
❑	Take necessary fire response actions and/or contact the local fire department to assist as needed
❑	Notify Management of the incident.

Figure 7 - Initial Response Action Checklist

6.5 Incident Specific Response Actions

Should notification be received of high risk incident, the following procedures will be followed:

- Accidental/ Uncontrolled release of CO2 from the pipeline.
    - Confirmation will be made by personnel on-scene that Pipeline Control is aware of the incident to effectuate shut down of the pipeline and closure of mainline valves to isolate the release and minimize the amount of CO2 released.
    - Consideration should be given to notifying and evacuating the public downwind of the release and closing roads. Coordinate with nearby fire departments and law enforcement to aid in any evacuation efforts.
    - Pipeline Control will call the appropriate public safety answering point (PSAP) and nearby fire departments, law enforcement, and other appropriate agencies. See Section 8 for a listing of PSAPs and Section 9 for agency contacts. Personnel on-scene during an incident may call 911 directly.
    - Pipeline Control dispatches Company Response Crew to investigate the incident and notifies the Qualified Individual.
    - Company Response Crew arrives at the incident site and completes initial response actions. A designated Company person from the response crew will fill the initial IC position.
    - The IC will conduct a risk assessment and coordinate with the Qualified Individual to determine what ICS positions need to be filled for the LRT.
    - The Qualified Individual or IC will establish liaison with the local emergency coordinating agencies, such as the 911 emergency call centers or county emergency managers in lieu of communicating individually with each fire, police, or other public entity.
    - If the response exceeds local capabilities, the IC will coordinate with the QI to determine the need for mobilization of a CST.
- Fire or explosion occurring near or directly involving a pipeline facility. Note, CO2 is not flammable, combustible, or explosive.
    - Call for assistance from nearby fire departments and company personnel as needed. Take all possible actions to keep fire from spreading to pipeline equipment. If fire still threatens the pipeline, activate shutdown procedure and depressurize threatened pipeline segments as practical.
    - For an explosion involving a pipeline facility, shut down the pipeline.
    - The IC will conduct a preliminary assessment of the situation upon arrival at the scene. Evaluate scene for potential hazards. Determine what product is involved.
    - Assemble the LRT at the Command Post.
    - Coordinate response efforts with on-scene fire department.
- Operational failure causing a hazardous condition.
    - Confirmation will be made by personnel on-scene that Pipeline Control is aware of the incident to effectuate shut down of the pipeline and closure of mainline valves to isolate the release and minimize a hazardous conditions.

- o Consideration should be given to evacuating the public downwind of the release and closing roads. Coordinate with nearby fire departments and law enforcement to aid in any evacuation efforts.

- o Pipeline Control will call the appropriate PSAP and nearby fire departments, law enforcement, and other appropriate agencies. See Section 8 for a listing of PSAPs and Section 9 for agency contacts. Personnel on-scene during an incident may call 911 directly.

- o Pipeline Control dispatches LRT to investigate the incident and notifies the Qualified Individual.

- o Company Response Crew arrives at the incident site and completes initial response actions. A designated Company person from the response crew will fill the initial IC position.

- o The IC will conduct a risk assessment and coordinate with the Qualified Individual to determine what ICS positions need to be filled for the LRT.

- o The Qualified Individual or IC will establish liaison with the local emergency coordinating agencies, such as the 911 emergency call centers or county emergency managers in lieu of communicating individually with each fire, police, or other public entity.

- o If the response exceeds local capabilities, the IC will coordinate with the QI to determine the need for mobilization of a CST.

- Fire or explosion occurring near or directly involving a pipeline facility. Note, CO_2 is not flammable, combustible, or explosive.

  - o Call for assistance from nearby fire departments and company personnel as needed. Take all possible actions to keep fire from spreading to pipeline equipment. If fire still threatens the pipeline, activate shutdown procedure, and depressurize threatened pipeline segments as practical.

  - o For an explosion involving a pipeline facility, shut down the pipeline.

  - o The IC will conduct a preliminary assessment of the situation upon arrival at the scene. Evaluate scene for potential hazards. Determine what product is involved.

  - o Assemble the LRT at the Command Post.

  - o Coordinate response efforts with on-scene fire department.

6.6 Personnel and Equipment

SCS will provide personnel, equipment, instruments, tools, and material as needed to respond to an emergency incident.

- All local company personnel are available for call-out as needed for duty on a 24-hour basis to support public safety agencies.

- Additional personnel, if required, will be acquired from agency responders from public safety agencies and/or response contractors.

- If public authorities are involved, they will be given full cooperation and assistance. In no event shall such cooperation and assistance violate safety rules or consist of actions that would endanger the public or employees.

- Company employees, contractors, and agency responders will be equipped with tools, supplies, and equipment available to be used in cases of emergency conditions existing on

or near the pipeline system. CO_2/O_2 monitoring devices should be used in the event of an accidental/uncontrolled release of CO_2. Self-contained breathing apparatus may be required pending results from on site-specific hazards and monitoring results.

6.7   Release of Carbon Dioxide

In the event of a breach of pipeline integrity resulting in an uncontrolled release of CO2, the following actions will be coordinated to minimize hazards to public health, the environment, and property.

Pipeline Control will immediately identify any possible rupture and fully close any remote mitigation valves to minimize the volume of CO2 released from the pipeline.

Pipeline Control will notify the PSAP and/or other agencies such as fire and law enforcement as well as aerial patrol to assist in identifying the location of the release. Aerial patrol will look for:

- blowing soil;

- presence of frost near the pipeline right of way;

- vapor cloud similar to that produced by dry ice; and

- dead or dying vegetation on or near the pipeline right of way in an otherwise green area.

Based upon the estimated volume of the release, topography, proximity of habitable structures, and weather conditions, work with the local emergency response agencies to effect orderly evacuation or shelter in place of the public. The safety of the public and the response team comes first.

Notify emergency agencies to help control traffic, establish zones to control sightseers, and determine if it is advisable to set up roadblocks. Roadblocks may be needed for pedestrian and automotive traffic. If active train tracks are near or crossing the area of potential impact, the railroad dispatcher will be notified (telephone numbers of railroad dispatchers are included in Section 8 of this procedure).

If roadblocks are set up, advise the controlled points of any resources which have been contacted so they may be admitted to the controlled area.

6.8   Pre-planning Emergency Response Activities with Public Awareness Program, Fire, Police, and Other Public Officials

To enhance cooperation during an incident response, SCS will liaise with agency responders and public officials including participating in emergency tabletop exercises, coordinating meetings to discuss hazards and emergency response, and conducting facility tours or open houses. These and other public outreach activities will be included in the Public Awareness Program that will be developed and implemented prior to commencing operation of the pipeline.

6.9   Required Pipeline Controllers Actions

Pipeline Control actions during emergency response actions will be detailed in the Control Room Management Plan to be developed and implemented prior to commencing pipeline operations. Generally, the actions will include:

- Identifying abnormal operating conditions – including potential pipeline ruptures;

- Confirmation of abnormal conditions;

- Specific steps to take in response to certain abnormal conditions – including closing valves, notifications internal to SCS, and external to agency responders; and

- Specific steps to take following pipeline shutdown to re-establish pipeline operations.

7 SCS INTERNAL CONTACTS

Internal Contacts			
Position/Title	Name	Office	Cell
Qualified Individual Director, Regulatory Compliance			
Alternate (QI) TBD			
TBD			

Figure 8 - Internal Contacts

8 PUBLIC SAFETY ANSWERING POINTS AND RAILROAD CONTACT INFORMATION

Public Safety Answering Points (PSAPs)	
TBD	
TBD	

Figure 9 - Public Safety Answering Points

Railroad Emergency Contact – 24/7	
TBD	
TBD	

Figure 10 - Railroad Emergency Contact

9   FEDERAL AND STATE AGENCY NOTIFICATIONS

9.1   Federal Agencies

FEDERAL PIPELINE SAFETY REPORT NATIONAL RESPONSE CENTER	
c/o United States Coast Guard (CG-5335) – Stop 7581	
Washington, DC 20593-0001	
24 Hour Phone	(800) 424-8802

REPORTING REQUIREMENTS: The NRC is the sole federal point of contact for reporting carbon dioxide, CO2, releases which enter or threaten to enter the navigable waters of the United States and for pipeline related incidents/ accidents as defined by the Department of Transportation / Office of Pipeline Safety. If you have a release or a pipeline incident/accident to report, contact the NRC at the earliest practicable moment **(within 1 hour)** via the toll-free number, or visit the NRC website (https://nrc.uscg.mil/l) for additional information on reporting requirements and procedures. For those without 800 access, please contact the NRC at 202-267-2675.

Type:

Any discharge that has impacted or threatens to impact navigable waters or a release that meets the criteria of PHMSA's reporting requirements under 49 CFR 195 (see PHMSA reporting requirements on the next page).

Verbal Notification:

Immediately (not later than one (1) hour of confirmation discovery to meet 49 CFR 195.52(a)). See PHMSA notification for follow-up NRC notification criteria within 48 hours).

Written Notification:

	Telephonic Reporting Must Include the Following Information:
	Name and address and operator identification number (OPID) of Summit
	Name and telephone number of the reporter
	The location of the failure
	The time of the failure
	The fatalities and personal injuries (if any)
	All other significant facts known by Summit that are relevant to the cause of the failure or extent of the damages or extent of the damages.

Figure 11 - Federal Agency Report

PIPELINE AND HAZARDOUS MATERIALS ADMINISTRATION (PHMSA)

US Department of Transportation

1200 New Jersey Avenue, SE. Washington, DC 20590

(800) 424-8802 – 24 hours to NRC/emergency number

202-373-2428

REPORTING REQUIREMENTS

Type:

In addition to the reporting of accidents to the NRC as noted below, a written accident report (PHMSA Forms 7000-1 via the online PHMSA Portal) must be submitted for releases resulting in any of the following:

– Explosion or fire not intentionally set by Summit.

– Release of five gallons or more of carbon dioxide, except that no report is required for a release of less than five barrels resulting from a pipeline maintenance activity if the release is:

– not one described under the NRC's reporting conditions

– confined to company property or pipeline right-of-way; and

– cleaned up promptly.

– Death of any person.

– Personal injury necessitating hospitalization.

– Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000

– Written reports are required to be submitted as soon as practicable but **no later than 30 days** after discovery of the accident on DOT Form 7000-1. Reports shall be filed by the Manager, EHS or designee. Changes or additions to the original report (PHMSA Form 7000-1) must be filed as a supplemental report within 30 days.

Verbal Notification:

Call to the NRC, within one (1) hour of confirmed discovery and within 48 hours revise or confirm initial report, meets the required verbal notification under PHMSA reporting requirements.

Written Notification:

As soon as practicable, an accident meeting any of the above criteria must be report via the PHMSA Portal at the following link:

https://portal.phmsa.dot.gov/portal

Figure 12 - PHMSA Reporting Requirements

OSHA	
Occupational Safety and Health Administration	
Occupational Safety & Health Administration (OSHA) Hotline	(800) 321-6742
Basic requirement. ALL fatalities (regardless if they are work related or not) must be reported to OSHA within **8 hours** of occurrence. **Work-related inpatient hospitalizations, amputations and losses of an eye** occurring within 24 hours of the incident must be reported to OSHA within 24 hours.	

Figure 13 - OSHA Notification

9.2 State Agencies

TBD	

Figure 14 - State Agencies

10 TRAINING & EXERCISES

10.1 Training

The Director, Regulatory Compliance shall ensure that all required Company personnel have received Incident Command training and that all Company personnel working within the ICS response organization understand their roles and responsibilities and the chain of command.

Company personnel shall receive specialized initial training for their roles and will also receive annual training as required by the Company's training program. To remain active, all Company response personnel must meet all training requirements to maintain current certifications and response readiness.

As part of the training program, the Company will meet with agency personnel to discuss response preplanning and preparedness.

10.2 Exercises

A tabletop exercise is a facilitated discussion about what the Company would do in response to an emergency incident. The exercise leads participants through a simulated scenario and prompts them to examine plans, policies, and procedures without disrupting the work environment. It allows

for a facilitated discussion of roles, procedures, and responsibilities in the context of a simulated scenario.

The goals of the tabletop exercise include:

- Evaluate the ability to prepare and respond using current plans, policies, procedures, and resources.

- Identify and document improvements for plans, policies, procedures, etc.

The tabletop should be designed to help identify strengths and areas for improvement. Example tabletop objectives may include:

- Evaluate the facility's response organization and operation within the response management system.

- Evaluate internal notifications and alerts, procedures, and training needs.

- Evaluate internal and external communications, including notifications to agencies and the public.

- Evaluate designated staging areas and other emergency response support locations, including activation of Company personnel.

- Evaluate response plans and procedures.

- Evaluate responder and equipment readiness.

Agency personnel will be given an opportunity to attend and participate in these exercises to help facilitate response actions, team integration, and agency expectations.

11 OPERATOR QUALIFICATION TASKS

To comply with the Operator Qualification program requirements in 49 CFR 195 subpart G, an Operator must have written description of the processes used to determine the qualification of persons performing operations and maintenance tasks. These descriptions and the maintenance of these records will be developed prior to the system becoming operational.

12 RECORDS/FORMS

Employees involved in emergency response should keep logs documenting the times of contacts and actions taken during the emergency. These logs may be useful when conducting the post-accident review.

- PHMSA Form 7000-1 Accident Notification Report

- Incident/Accident Investigation

- SCS Safety Manual

Incident Report Form

Name (First/Last):		Day Phone:	
Title:		Evening Phone:	
Operator Name:		Organization Type:	
Facility Name:		Company:	
Address:		Address	
Facility Latitude:		Facility Longitude:	

Incident Details

Date/Time of Incident:	Date:		Time	
Spill Location/Address:				
Nearest City:		State:	County:	Zip:
Section:		Township	Range:	Borough
Distance from City			Direction from City	
Container Type:			Container Storage Capacity	
Facility Oil Storage Capacity (gallons):				

Materials

Discharge Amount	Unit of Measure	Impacted Water		Quantity Impacting Water
		☐ Yes	☐ No	
		☐ Yes	☐ No	
		☐ Yes	☐ No	

Response Actions

Actions Taken to Correct, Control or Mitigate Incident:

Impact

Number of Injuries		Number of Deaths:	
Evacuation Required:	☐ Yes ☐ No	Number Evacuated:	
Areas to be Evacuated:			
Damage Amount (approximate):			
Medium Affected:			
Medium Description:			
More information on Medium:			

Additional Information

Any information about the incident not recorded elsewhere in this report:

Call Notifications

National Response Center (NRC):	1-800-424-8802	NRC Report #	
PHMSA ☐ Yes ☐ No	OSHA ☐ Yes ☐ No		State: ☐ Yes ☐ No
Additional Notifications:			

Note: It is not necessary to wait for all information before calling NRC

Figure 15 - Incident Report Form

1. Event Name			Prepared by: Date: Time:		NOTIFICATION REPORT NOTIFICATIONS
Organization Name	Phone Number	Date/Time Notified	Person Contacted	Notified By	Notes

Figure 16 - Initial Notification Form

13 REFERENCES OR RELATED DOCUMENTS

[Reference and Related Documents to be added]

14 PLAN MAINTENANCE

14.1 Responsibility

Single point accountability (SPA) for the ERP development and maintenance rests with the Director, Regulatory Compliance. Accountabilities include:

- Development and maintenance of the ERP;

- Ensure systems (ex: Incident Command System) and response structure can meet the requirements specified herein;

- Ensure the ERP is reviewed at least annually and revised/updated as necessary; and

- Ensure SCS employees, contractors, and responders are trained on and provided a copy of the ERP.

14.2 Plan Revisions

Initially, and at regular intervals, SCS will perform hazard assessments to identify possible incidents that have the potential to negatively impact people, the environment, and/or property. This plan will be updated to address any changes to or new hazards identified in the hazard assessments.

14.2.1 Initiating Revisions

All requests for change must be made through the Director, Regulatory Compliance using the Revision Request Form incorporated in this document.

14.2.2 Revision Distribution

Plan revisions are issued with an Acknowledgement of Receipt Form and a brief description of the itemized changes. The Acknowledgement of Receipt Form must be signed and returned to the Director, Regulatory Compliance. A revised date is shown at the bottom of each updated or new page. The original date of the manual is August 28, 2023.

Distribution List	
Copy Number	Plan Holder
1	Director, Regulatory Compliance Summit Carbon Solutions 3221 North Loop Drive, Suite 221 Ames, IA 50010
2	TBD Emergency Management/Response Agency Representative(s)
3 (Electronic)	TBD

Figure 17 - Distribution List

14.2.3 Revision after Incident or Exercise

In the event SCS experiences an incident, or conducts an exercise or training session, the effectiveness of the plan will be evaluated and updated to include lessons learned as necessary. After each incident or exercise, a post incident/exercise review will be conducted in a timely

manner. The Plan will be evaluated to determine its usefulness during the incident/exercise. Items discussed after an incident include but are not limited to effectiveness of detection and detection equipment, proper and timely notifications, initial and ongoing incident assessments, mobilization of resources, and/or response effectiveness. Consideration will be given to including agency responder personnel in the post-incident or training session review.

14.2.4 Changes in Operating Conditions

If an operating condition changes that would substantially affect the implementation of the plan, SCS will modify the Plan to address such a change. Updates would be implemented prior to the change or interim operating provisions would be instituted until the update is fully implemented.

14.2.5 Change Log

Date	Rev. No.	Change Location	Brief Description of Change	By

Figure 18 - Change Log

15 DISCLAIMER

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