



CONTINGENCY PLAN FOR THE TRANSPORTATION
AND MARITIME SHIP AND BARGE LOADING OF
SULFUR BY PORT OF ANACORTES

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INTRODUCTION

Marsulex via its contractors, transports sulfur by truck from its Skagit Valley plant to the Port of Anacortes, where the Port of Anacortes (PORT), and its contractors, load the sulfur onto ships and barges.

The PORT has prepared this plan to minimize the risks of spills or accidents during the transfer of sulfur from its production and storage facilities to vessels at the Port of Anacortes, and to minimize the potential for sulfur spills to the land or water. The plan also provides contact persons or agencies to be notified in the event of any emergency.

The shipping process is divided into three segments. The initial element is the transfer of stored sulfur onto highway transport trucks at the production facility. The next element of the shipping process is the transport of the sulfur to the Port of Anacortes by a commercial trucking company. MARSULEX's trucking contractor has primary responsibility for assuring compliance during this segment of the operation. The final element is the transfer of the sulfur from the delivery trucks into the holds of vessels at the shipping berth. A sub-contractor to the Port of Anacortes performs this function on behalf of the Port of Anacortes. The Port of Anacortes is responsible for coordinating the response efforts associated with any spills or emergencies that may occur on Port property.

Attached to this Contingency Plan is the Material Safety Data Sheet (MSDS) for Sulfur.

TRUCK LOADING

The loading of trucks is accomplished by a front-end loader or through a loading hopper and adjustable chute. The adjustable chute is lowered initially and raised during the loading process to minimize the emission of air borne particles. In both methods of loading, efforts are made to minimize the spillage of sulfur onto the trucks or onto the ground. Traffic is kept to a minimum in the loading areas in order to minimize the potential to “track out” sulfur.

After loading, but before leaving MARSULEX property, MARSULEX contractors ensure each truck is thoroughly cleaned of any sulfur and the trailers are tarped. Each truck goes through a truck and wheel wash facility. MARSULEX contract personnel then inspect each truck and remove any remaining sulfur on the outside of each vehicle with high-pressure water or air jets and tarp the trailers. In the event of freezing weather, the wash rack may have to be shut down to avoid creating a hazardous road condition. If the wash rack is shut down, air jets will be used to remove the sulfur from the trucks, and notification will be made to the Shift Supervisor and the Environmental duty person.

MARSULEX employees and/or MARSULEX contractor personnel frequently inspect and clean the loading areas. Minor sulfur spillage is promptly cleaned up. In the event that any significant quantities of sulfur are spilled into the traffic path, a loader is used to clean up such spills. Any residual sulfur, which cannot be reclaimed by the loader, is cleaned from the area manually or by contract personnel using MARSULEX’s street sweeper.

A water truck is also available on an on-call status through the trucking contractor. The truck is equipped with conventional water spreader nozzles, which facilitate the sprinkling of traffic lanes and other surfaces in the event that such action becomes necessary.

TRUCK TRANSPORTATION

The transportation of sulfur from the production and storage facilities of MARSULEX is handled by a trucking contractor under contract with MARSULEX. The equipment operated by the trucking contractor has been proven with respect to its ability to contain finely divided solids.

The bottom dump trailers operated by the trucking contractor are individually fitted with tight fitting bottom gates and specially designed gate seals which prevent leakage of finely divided solid cargoes during highway transport. The truck trailers are fully covered to prevent sulfur dust from blowing out during transport.

The trucking contractor furnishes a supervisor who is assigned to oversee all trucking operations. The supervisor is on duty whenever sulfur shipping is underway and is dedicated to the MARSULEX sulfur transportation project. The supervisor frequently travels on a route from MARSULEX to the ship-loading berth following the same route traveled by the trucks. As this supervisor travels the route between the sulfur loading point and the unloading destination, he observes the truck loading process, the highway transportation process, and the unloading process. The supervisor is responsible for assuring that all phases of the trucking process are carried out in a manner, which assures that the movement does not create any detrimental impact to the environment and that compliance with all applicable rules, regulations, and ordinances is maintained.

The supervisor is responsible for observing conditions throughout the transportation process. The supervisor notifies truck drivers, plant personnel, public officers, emergency response units, and other concerned agencies and individuals of hazards that may occur along the route, problems at either end of the route, or emergency situations that may occur involving the sulfur and the transportation equipment. The supervisor has a means of direct and immediate communications with all truck drivers, MARSULEX and the Port of Anacortes, such as CB radio or cellular telephone.

At the conclusion of each load out, a MARSULEX contractor employee, if conditions warrant, may be brought in to operate the street sweeper. MARSULEX's street sweeper is similar to the sweepers used by state and local agencies to sweep public roadways. Water trucks are also available to wet down any spills, which may occur during a shipping campaign to abate any dust potential and to ameliorate any fire hazard.

In the event of a sizable sulfur spill along the route, a truck and shiploader will be rushed to the site to recover the spilled sulfur and to remove it from the site of the accident. The street sweeper may also be used to clean up any residual sulfur.

The trucking contractor has skilled mechanics available to respond to any mechanical equipment problems, which might occur. MARSULEX maintains 24-hour-per-day telephone answering service to assure that standby equipment and operators can be summoned on an emergency response basis irrespective of the time of day or night.

A Port inspector monitors the truck un-loading operation. If any problems occur at the Port, the inspector coordinates efforts to eliminate such problems and to clean up the area as needed. MARSULEX and its trucking contractor are available to assist, upon request by the Port.

MARSULEX is directly responsible for coordinating the response effort for any emergencies or spills which occur on the truck route, and for making associated notifications as specified under the Emergency Response Notifications section of this document.

SHIP AND BARGE LOADING

A Port of Anacortes stevedoring sub-contractor is responsible for receiving the sulfur from the highway transport trucks and transferring the sulfur into the holds of maritime vessels at the Port of Anacortes. To accomplish this task, the stevedore has provided a belt conveyor at the berth. The conveyor is equipped with a receiving hopper at the lower end of the belt. Each truck drives up a slight incline and advances until the materials are over the receiving hopper. The trailer straddling the hopper is then dumped onto the moving belt, which conveys the sulfur into the ship's hold. Subsequently, the second trailer in the set is positioned and dumped, and the vehicle leaves as the next truck approaches the ramp.

The stevedoring company handles the loading operation for the Port of Anacortes and the Port is ultimately responsible for minimizing sulfur spillage and for cleaning any areas in which spillage occurs. All practical methods to reduce pollution and hazards in the area as a result of the handling of sulfur at the ship-loading berth are used. This includes sweeping, vacuuming, water spray, and water wash down techniques.

The stevedoring company provides employees at the dock who are responsible for sweeping up any spillage and shoveling it back into the ship loading system. Hence, all spillage, which occurs due to improper truck dumping or belt loader malfunctions, is cleaned up expeditiously to assure that the dock is continuously maintained in a clean condition.

A skip loader is also available at the dock for use in recovering any large sulfur spills which may occur as a result of either conveyor belt malfunctions or truck spills in the berth area. In the event of any spill large enough to require the use of a skip loader for material retrieval, manual sweeping and shoveling is also used to recover any residual sulfur, which the loader is unable to recover. After completion of each ship loading operation, the stevedoring company cleans the dock area.

The Port is directly responsible for coordinating the response effort for any emergencies or spills which occur at the Port, and for making associated notifications as specified under the Emergency Response Notifications section of this document. MARSULEX and its contractors are available to assist upon request.

The Port will form a Marine Terminal Advisory Committee as per the attached Bylaws prior to the loading of the first vessel and no later than May 1, 2011. The Committee will again meet to review the plan for loading the first vessel prior to vessel arrival. The Committee will be invited to view the vessel operation. The Committee will meet again at the end of the vessel operation to review the loading performance.

If the loading operation exceeds standards for dusting and or smell, the Committee will meet as soon as possible to review the ongoing operation and recommend solutions. The standard for H₂S smell for the prilled sulfur operation shall be established as 8 ppb H₂S at the edge of Port property at the marine terminal.

EMERGENCY RESPONSE NOTIFICATION

One purpose of this plan is to specify the agencies and/or individuals, which should be contacted in the event that an accident or malfunction produces an emergency situation. Obviously, there is always the possibility of a motor vehicle accident occurring during the trucking phase of the operation. In addition, there is the potential for sulfur spills to occur either in conjunction with a vehicle accident or due to human error or mechanical failure. A personal injury could occur due to an accident either on the highway or at the loading or unloading terminals.

Since the routes between the production and storage facilities of MARSULEX and the shipping berth are within the jurisdiction of the City of Anacortes Fire Department and the Skagit County Fire District No. 13, these departments have jurisdiction for all fire emergencies. Law enforcement response is provided by the Washington State Patrol on all state highways and freeways; however, the State Patrol also assists in summoning appropriate law enforcement, fire safety, and medical assistance to any emergency site within Washington. The Anacortes City Police Department has primary law enforcement jurisdiction on those public roads, which are not state highways or freeways, and the Port of Anacortes has responsibility on Port property.

Emergency medical response is summoned by calling a centralized paramedic dispatch center, which serves the Anacortes area. Port sub-contractors will handle cleanup of spills at the Port. MARSULEX and its trucking contractor will handle the cleanup of spills on the trucking route.

The following is an outline of the agencies and/or individuals to be contacted and the telephone numbers to be used in the event of emergencies. After these initial contacts are made, MARSULEX should be notified of all incidents.

POLICE – LAW ENFORCEMENT

In the event of a motor vehicle accident, the first contacts should be to one or both of the following:

Washington State Patrol (State Highways & Freeways)	911
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Anacortes City Police Department (Local Streets and Vicinity)	911
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FIRE PROTECTION

The fire department should be promptly notified whenever fires or the likely potential for fires, including after any vehicle accidents involving sulfur trucks.

Anacortes City Fire Department 911

Skagit County Fire District No. 13 911

MEDICAL AID

Paramedics should be promptly notified whenever an accident has occurred involving injuries.

Paramedics 911

EMERGENCY COORDINATION AND FOLLOW-UP

In the event of any accident, fire, personal injury, sulfur spill or other emergency which occurs on the truck route, notify MARSULEX for response coordination, investigation, and problem rectification. During anytime of the day or night, call:

MARSULEX (360) 424-5915

Describe the situation and ask to speak to the Shift Supervisor(s).

In the event of any accident, fire, personal injury, sulfur spill or other emergency, which occurs at the Port of Anacortes, notify the Port for response coordination, investigation, and problem rectification.

Call in the order listed:

Port of Anacortes Marine Terminal Manager (360) 299-1829 (Office)
John Hachey (360)-661-1672 (Cell)

Port of Anacortes Operations Supervisor (360) 299-1828 (Office)
Josh Beaner (360)-661-6274 (Cell)

MARSULEX or the Port will then make the following notifications. These notifications shall be made as soon as possible after MARSULEX or the Port is aware of an Incident. Call in the order listed.

Spill to Land, Air or Water

State Department of Emergency Management (800) 258-5990

Skagit County Dept. of Emergency Management (360) 428-3250

Northwest Clean Air Agency (NWCAA) (360) 428-1617
(Normal work week hours)
(360) 428-1617
(Other times leave message)

Other Emergencies

Confirm that police, fire department, and/or medical aid personnel have been notified, as appropriate. Numbers are listed above.

GENERAL COMPLAINTS OR COMMENTS

MARSULEX is interested in any public comments or concerns regarding its sulfur shipping operations. The following personnel can be contacted during normal work hours:

Pat Murphy (360) 424-5915

OTHER CONTACTS

LTI Trucking (trucking contractor) (800) 327-6255

Metropolitan Stevedore Co. (Sulfur handling contractor) (360) 299-2931

ATTACHMENT A1
SULFUR MSDS

