From: Ralph, William H.

To: Jordan, Jerry

CC: BCC:

Sent Date: 2004-09-27 21:51:24:546 **Received Date:** 2004-09-27 21:51:24:546

Subject: RE: FCU-500 Trailer Facility Siting Plan

Attachments:

I am familiar with it and we do use it. The Facility Siting Screening Workbook was created by Amoco Refining and used by all of the Amoco refineries to complete the required facility siting studies back in 1997. The MOC PHA checklist for temporary trailer siting is based upon the workbook. The checklist calls for a distance of 350' from the process. At 350' (for a wood frame and siding building) the risk of fatality is extremely low; therefore, the workbook exempts these buildings from the study.

----Original Message-----From: Jordan, Jerry

Sent: Monday, September 27, 2004 4:04 PM

To: Ralph, William H.

Subject: FW: FCU-500 Trailer Facility Siting Plan

I got this note from Larry Carper concerning Whiting latest requirements for trailer siting. They refer to a "Facility Siting Screening Workbook", just wondering if you have seen it and if it might be something we want to use.

-----Original Message-----From: Carper, Larry W

Sent: Saturday, September 18, 2004 1:53 PM

To: Politte, Mark D.; Hansen, Joy M; Jordan, Jerry; Reid, Kenneth R.; Murphy, Kevin J; Maignan,

Frantz (LAV)

Cc: Duff, Tom B; Cherry, Corey N; Hebert, James D; Carper, Christopher T

Subject: FW: FCU-500 Trailer Facility Siting Plan

fyi - interesting reading with some serious implications.

-----Original Message-----From: Brichta, Joseph W Sent: Fri 9/17/2004 5:21 PM

Subject: FCU-500 Trailer Facility Siting Plan

I met with Pete Bauer today and reviewed the latest requirements for trailer facility siting (see attached note) for the FCU-500 TAR. I have also asked Randy St. Peter to take the lead on being our Logistic Coordinator for this TAR (Gary I hope you don't mind) and to pull everyone's trailer requirements together into a comprehensive drawing for the HSSE group to approve as quickly as possible. Changes in our plans for setting up this TAR and all future TARs will change. We have put peoples' move to the TAR on hold, existing trailers will need to be moved, and trailers planned for mobilization are currently on hold. This will be a significant change and disruption in our mobilization plans so I ask everyone's support in this effort. Thanks.

Just to give a little more context around Dave's original note.

- We use the "Facility Siting Screening Workbook" to examine all buildings across the plant, whether they be permanent buildings or trailers. The workbook is a risk-based approach to determine if building occupants are at an "acceptable" risk level. Bluntly, it looks at the risk of a fatality due to a building collapse in a vapor cloud explosion. All existing buildings and trailers in the plant have passed this criteria. It does not mean that all buildings/trailers are safe from any damage in incidents. Rather it means that our risk of a fatality is low.
- The "Facility Siting Screening Workbook" is a great tool, but it's limitations come to light
 when examining TAR trailers. The workbook uses risk criteria (number of people, how
 many hours in the trailer, etc.) on an annual basis. Well, TAR trailers may have many
 people for 1 month, and few to zero people for 11 months. That is why TAR trailers
 (including Bernaland) have historically passed the criteria. The average annual
 occupancy turns out to be on the low side.
- The 100' from process equipment and 200' from flares has always been in the ACES/Amoco specs. Historically, we have probably not done a good job holding to this criteria. We need to do better when deciding the location of new buildings / trailers.

PROPOSED PATH FORWARD FOR FCU 500 --

- 1) Put together TAR trailer plan that meets criteria of 100' from hydrocarbon process equipment and 200' from flare.
- 2) Using trailer plan and estimated occupancy numbers, Safety can run the "Facility Siting Screening Workbook". We must pass this assessment (historically, we have passed this criteria for TAR trailers).
- 3) Based on feedback from the CFHU compressor explosion, the RPSC will review the process we use for building / trailer siting.

Pete

-----Original Message-----From: Brichta, Joseph W

Sent: Wednesday, September 15, 2004 10:31 PM

Subject: RE: Criteria For Trailer Placement For The Whiting Business Unit

Have you laid out these areas on a refinery map so we have some idea where trailers can go? What is "low occupancy" calculations? Who is looking to see how this effects the rest of the refinery? Alky compound, Gate 13 women's locker room trailer, RSC trailer near VRU-100 flare, trailers by 3UF flare, are gate 15 guards/house with 200 ft of VRU flare, trailers north of 11-PS proximity to DDU Flare and 11-PS furnaces, etc.? How does this effect things like zone maintenance craft shops, training buildings, or control rooms on or near units that do not have explosion resistance windows or rafter tie downs to prevent roofs from collapsing? How is this getting communicated to entire refinery? Who will be accountable for reviewing entire refinery? I realize this was intended as a ruling for the FCU-500 TAR, but it has far reaching effects that people will start asking about as soon as we start relocating, so we need to be prepared with answers to peoples questions.

Pat, please get with Bob Vargo and work up a change order for the cost to move this trailer along with estimated cost for temporary power & fiber for new trailer location. New

location I'm sure will not currently be wired up.

----Original Message-----

From: Limbaugh, David A
Sent: Wednesday, September 15, 2004 3:21 PM

Subject: RE: Criteria For Trailer Placement For The Whiting Business Unit

Needs to move.

----Original Message---From: Korba, James D

Subject: RE: Criteria For Trailer Placement For The Whiting Business Unit

So, based on your knowledge of the CAT Trailer, do we have to move? Are we grand fathered, since it has been here for nearly three (3) years and has a gas monitoring system?

> -----Original Message-----From: Limbaugh, David A

Sent: Wednesday, September 15, 2004 2:15 PM

Subject: Criteria For Trailer Placement For The Whiting Business Unit

I have been asked to help expedite a decision on the FCU 500 /VRU 100 -200 TAR Trailer Siting and here is the decision...

Pete Bauer, Bill Lash, Joe Katona and I met today to review regs. as they relate to trailer placement with regard to the impact from explosions, toxic releases or hydrocarbon releases, and we came up with a common standard as follows:

- You cannot place trailers within 100 feet of identified process equipment that may contain hydrocarbon, i.e., drums, exchangers, furnaces, etc.. This does not include process piping.
- You cannot place trailers within 200 feet of a flare
- You must pass the "Low Occupancy" calculation.