

ExxonMobil Pipeline Company

**SCAT Area Transition Report for
A16**

Silvertip Pipeline Incident
Laurel, Montana

October 18, 2011



SCAT Area Transition Report for A16

Silvertip Pipeline Incident
Laurel, Montana

Prepared for:

ExxonMobil Pipeline Company

Prepared by:

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Our Ref.:

B0085883.1103

Date:

October 18, 2011

The observations described in this Report were made exclusively under the conditions at the time and subject to the limitations stated therein. It is understood by Client that ARCADIS has relied on the accuracy of documents, oral information, and other material and information provided by sources documented in this report, including but not limited to information provided by Client and Client's other contractors. ARCADIS has not independently verified any such information. The conclusions presented in the Report are based solely upon the observations and representations made by others.

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1. Executive Summary of Oil Removal Activities

This Shoreline Cleanup Assessment Technique (SCAT) Area Transition Report provides a summary of the SCAT surveys conducted to determine the extent of oiling along the riverbanks and floodplain within SCAT Area A16, as well as the oil remediation activities completed in this area based on the SCAT Team recommendations. This report also summarizes the environmental samples collected in SCAT Area A16.

1.1 Land Ownership and Access Issues

Figure 1 provides an aerial map of SCAT Area A16, along with the (a) SCAT Area boundary, (b) parcel boundaries and respective property owners, and (c) access constraints identified during the oil cleanup process. The acreage surveyed in Area A16 is 25.8. There were partial access issues for the left bank of this area.

1.2 Cultural, Historic, and Natural Resource Constraints

No historic properties or cultural resources have been identified within this segment that would affect oil removal activities.

Figure 2 summarizes the natural resources identified in this segment. International Bird Rescue and Resource Advisors from U.S. Fish and Wildlife Service conducted regular inspections of the areas in A16 that did not have access issues. No oiled wildlife was observed or recovered. No Wildlife Priority Cleanup Areas were identified. No active migratory bird nests were identified in Area A16.

1.3 Summary of Environmental Sampling

Table 1 (below) summarizes samples collected within Area A16. The analytical results for the samples collected can be accessed through a publicly accessible database on the United States Environmental Protection Agency's (USEPA's) website. The approximate locations of samples collected within Area A16 are provided on Figure 3.

Table 1 Environmental Sampling Summary

Site_No	Samp_No	SampleDate	Matrix	Location	Latitude	Longitude
CTEH	LAMT0824SO601	8/24/11	Soil_River	SO-A16	45.65608	-108.710035

Appendix A contains a summary of sample results with detections for this sample set. Detections with a result above the screening level are highlighted; for this set, one exceedance is shown for Vanadium.

1.4 Summary of Initial SCAT Surveys

The SCAT teams used systematic evaluation criteria and treatment method tables approved by the National Oceanic and Atmospheric Administration to provide a standard approach for data collection and conducting field surveys. The forms and sketches from the initial SCAT surveys performed along the river bank (water edge) and floodplain within Area A16 are included in Appendix B. Figure 4 provides the maximum oiling zones observed by the SCAT team during the initial surveys of Area A16.

1.5 Applicable Compiled Treatment Recommendations

The SCAT team developed compiled treatment recommendations (CTRs) providing approved treatment methods (ATMs) for each oiling zone identified during the initial SCAT surveys ([CTR No. 1](#), included as Appendix C).

1.6 Oil Removal Activities

Oil removal activities were conducted within Area A16 in accordance with the ATMs identified in the CTRs. [Appendix I](#) of the Summary of Assessment and Oil Removal Activities report presents this data including: date range/days worked, average number of people working per day, equipment used, and various types of bags removed: oily debris, personal protective equipment, plastic, trash, super sacks, wood chips, and contaminated wood.

1.7 Pre-Inspection Survey Transmittal

SCAT Operations liaisons performed an inspection of the remediated areas of SCAT Area A16 and developed a Pre-Inspection Survey Transmittal (PIST) associated with the right bank within Area A16, which is presented in Appendix D.

1.8 Post-Inspection Survey Transmittal

A Post-Inspection Survey Transmittal (POST) was not conducted for this segment.

1.9 Summary of Final SCAT Surveys

Figure 5 shows the oiling conditions within Area A16 following completion of oil removal activities. The SCAT team performed final surveys of the right bank within SCAT Area A16 to confirm the agreed-upon cleanup endpoints identified in the applicable CTRs had been achieved. The final SCAT survey documentation is presented in Appendix F.

1.10 SCAT Area Conclusions

Based on the final SCAT survey performed on the right bank within Area A16, no further treatment is recommended for this area. Based on the initial SCAT survey, no oiling was observed on the left bank of Area A16. A SCAT Segment Sign-Off Sheet is included as Appendix G.



**SCAT Area Transition
Report for A16**

Silvertip Pipeline Incident
Laurel, Montana

2. Transition Sign-Off Form

SCAT Area Transition Report for A16

Prepared for:

Unified Command

Date

Unified Command – RP



**SCAT Area Transition
Report for A16**

Silvertip Pipeline Incident
Laurel, Montana

SCAT Area Transition Report for A16

Prepared for:

Unified Command

9/27/2011

Date

S. WEHNER

Unified Command – FOSC



**SCAT Area Transition
Report for A16**

Silvertip Pipeline Incident
Laurel, Montana

SCAT Area Transition Report for A16

Prepared for:

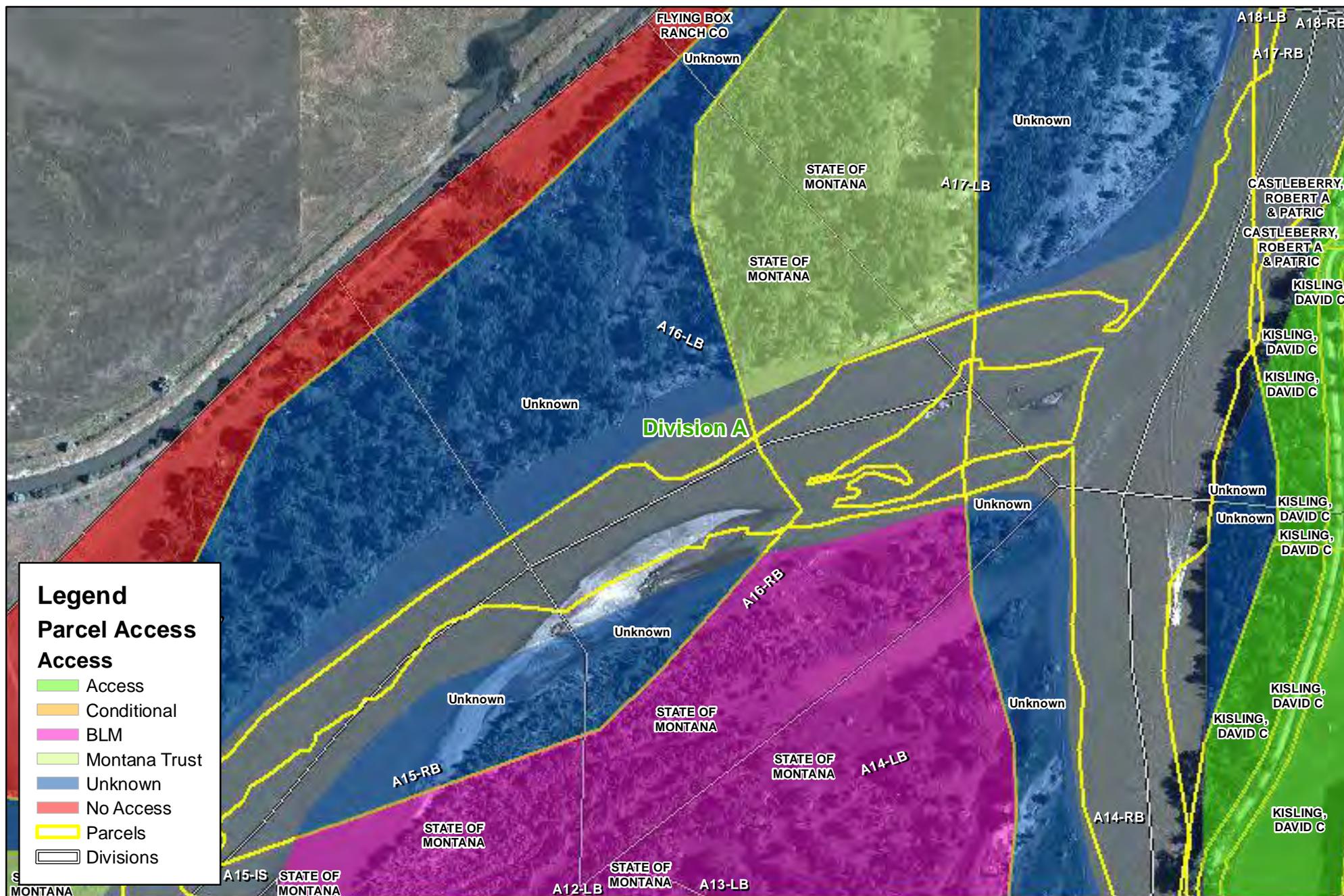
Unified Command

9/27/11

Date

A handwritten signature in blue ink, appearing to read "L. A. [unclear]", written over a horizontal line.

Unified Command – MDEQ



Legend

Parcel Access

Access

- Access
- Conditional
- BLM
- Montana Trust
- Unknown
- No Access
- Parcels
- Divisions

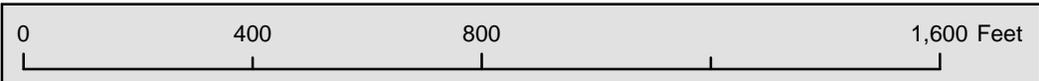


Figure 1

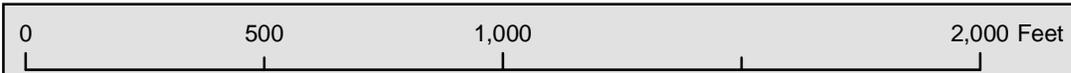
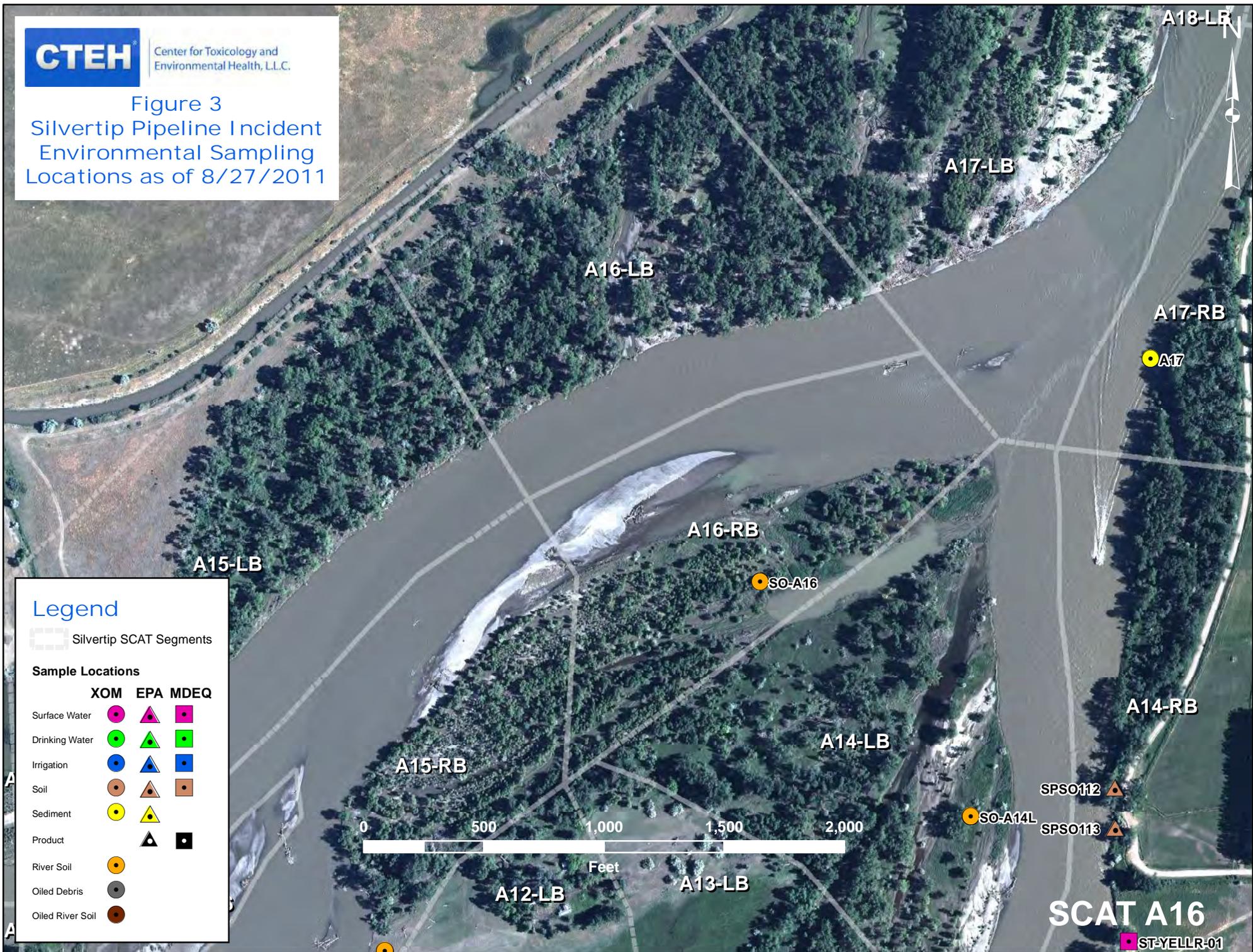


Figure 2
Wildlife Resources



Center for Toxicology and Environmental Health, L.L.C.

Figure 3
Silvertip Pipeline Incident
Environmental Sampling
Locations as of 8/27/2011





Legend

- Heavy
- Moderate
- Light
- Very Light
- No Oil Observed

Maximum SCAT Observation
A16
Figure 4

0 200 400 Feet

Aerial Reference: July 20, 2011 Aerial by Aerial Surveys International, LLC. Georeferenced to UTM 1983 Zone 12N.



Legend

- Heavy
- Moderate
- Light
- Very Light
- No Oil Observed

Final SCAT Observation

A16

Figure 5



Aerial Reference: July 20, 2011 Aerial by Aerial Surveys International, LLC. Georeferenced to UTM 1983 Zone 12N.



Appendix A

Sample Detections Summary



Detections in Samples Collected in SCAT Area A16

Printed 9/7/2011

NA - Not Available

Detected Above Screening Level

Sample Num	Date	Sample Type	Matrix	Analytical Method	Analyte	Detected	Result	Screening Level	Result Qualifier	Units	Above?
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Arsenic	Y	22.1	40		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Barium	Y	164	820		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Cadmium	Y	1.2	3.8		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Chromium	Y	24.4	280		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Lead	Y	10.1	400		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Nickel	Y	19.9	150		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 6010	Vanadium	Y	39.2	39		mg/kg	YES
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 9060	Mean	Y	6420	NA		mg/kg	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 9060	RSD%	Y	3.9	NA		%	no
LAMT0824SO601	24-Aug-11	Field	Soil_River	EPA 9060	Total	Y	6790	NA		mg/kg	no



Appendix B

Initial SCAT Survey Forms and
Sketches

DB / A / SC

RIVER BANK OILING SUMMARY FORM for Silvertip Pipeline Incident

1 GENERAL INFORMATION		Date (dd/mm/yy) 11-Jul-2011	Time (24h): std / daylight 1122 hrs to 1123 hrs	Water Level low - mean - bankfull - <u>overbank</u> falling - steady - rising
Segment/Reach ID: A16 Left Bank / <u>Right Bank</u> / Island		Operations Division: A		
Survey by: Foot / ATV / <u>Boat</u> / Helicopter / Overlook /		Sun / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp +/- <u>29.4</u> deg C

2 SURVEY TEAM # 2 & 4	name	organization	contact phone number
Andrew Milanes		Polaris	<i>[Signature]</i>
Tom Freeman		Polaris	
Andrew Johnson		USCG	
Travis Olson		USCG	

3 SEGMENT Total Segment/Reach Length _____ m Segment/Reach Length Surveyed 384 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud _____ Sand _____ Mixed S _____ Pebble/Cobble _____ Boulder _____ Peat/Organic _____ Vegetated Bank: P Wooded Upland: S

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: _____ Est Height _____ m canyon _____ manmade _____ meander _____ confined or leveed _____ Substrate Type: mixed

Sloped: (>5°)(15°)(30°) straight P braided S oxbow _____ flood plain valley _____ Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m 133m est. water depth: <1m 1-3m 3-10m >10m _____ m

shoal(s) present Y/N point bar present Y/N bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: falling — same — rising

5 OPERATIONAL FEATURES Suitable backshore staging Y/N Access: Direct from backshore Y/N Alongshore from next segment Y/N

Debris: Y/N oiled Y/N amount _____ bags or 1 trucks access restrictions

Oiled trees/shrubs Y/N River Current strong Y/N Other Features:

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

117

OIL ZONE ID	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER							SUBST. TYPE(S)	
	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC	SR	AP		NO
A			X		384	1	65			X	X		X								Grass, trees, debris

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench — e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR				

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Oiled Band Heights: Zone A - 20cm

Due to survey platform (jet-drive boat) oil band width and heights are estimates. Unable to verify by foot.

Cleanup Recommendations: Trim oiled vegetation; wipe large oiled debris; remove small oiled debris; wipe oiled trees;

(for ALL sub-segments record: sub-segment ID, length, length surveyed, and GPS start/end fixes)

Sketch (Yes/No) Photos (Yes/No (Roll # _____ Frames _____) Video Tape Yes/No (tape# _____)



SCAT Teams 2 & 4 Survey

Segment A16 Right Bank

11-Jul-2011



Legend

 Oil Zones

 Segment Boundaries

RIVER BANK OILING SUMMARY FORM for Silvertip Pipeline Incident

1 GENERAL INFORMATION		Date (dd/mm/yy) 13-Jul-2011	Time (24h): std / daylight 1130 hrs to 1157 hrs	Water Level low - mean - bankfull - <u>overbank</u> falling - steady - rising
Segment/Reach ID: A16 Left Bank / <u>Right Bank</u> / Island		Operations Division: A		
Survey by: <u>Foot / ATV / Boat / Helicopter / Overlook /</u>		<u>Sun</u> / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp +/- <u>32</u> deg C

2 SURVEY TEAM # 2 & 4	name	organization	contact phone number
Andrew Milanes		Polaris	
Tom Freeman		Polaris	
Andrew Johnson		USCG	
Travis Olson		USCG	
Trevor Selch		Montana Fish & Game	

3 SEGMENT	Total Segment/Reach Length _____ m	Segment/Reach Length Surveyed <u>150</u> m
Start GPS: LATITUDE _____ deg. _____ min.	LONGITUDE _____ deg. _____ min.	Datum: _____
End GPS: LATITUDE _____ deg. _____ min.	LONGITUDE _____ deg. _____ min.	

4A RIVER BANK TYPE	SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED		
Bedrock: Cliff/Ramp _____ Shelf _____	Manmade: Solid _____ Permeable _____ (type) _____	Wetland: Swamp _____ Bog/Fen _____ Marsh _____	
Sediment Bank: Clay/Mud _____ Sand _____ Mixed S _____ Pebble/Cobble _____ Boulder _____ Pea/Organic _____	Vegetated Bank: <u>P</u>	Wooded Upland: <u>S</u>	
Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____	If snow and ice use Winter River SOS		

4B RIVER VALLEY CHARACTER	select as appropriate			complete for primary
Cliff or Bluff: Est Height _____ m	canyon _____	manmade _____	meander _____	confined or leveed _____
Sloped: (>5°)(15°)(30°)	straight <u>P</u>	braided <u>S</u>	oxbow _____	flood plain valley _____
				Substrate Type: <u>mixed</u> Forested / <u>Vegetated</u> / Bare

4C RIVER CHANNEL CHARACTER	circle or select as appropriate		
est. width: <1m 1-10m 10-100m >100m <u>133m</u>	est. water depth: <1m 1-3m <u>3-10m</u> >10m _____ m		
shoal(s) present <u>Y/N</u>	point bar present <u>Y/N</u>	bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris	
seasonal water level: low / mean / bank full / <u>overbank flow</u>	est. change over next 7 days: <u>falling</u> — same — rising		

5 OPERATIONAL FEATURES	Suitable backshore staging <u>Y/N</u>	Access: Direct from backshore <u>Y/N</u>	Alongshore from next segment <u>Y/N</u>
Debris: <u>Y/N</u> oiled <u>Y/N</u> amount _____ bags or <u>1</u> trucks	access restrictions		
Oiled trees/shrubs <u>Y/N</u>	River Current strong <u>Y/N</u>	Other Features:	

6 SURFACE OILING CONDITIONS																						begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type	
OIL ZONE	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER							SUBST. TYPE(S)			
	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC	SR	AP		NO		
A				X	75	50	5	X	X	X	X		X									Grass, trees, debris	
B				X	5	5	75	X	X	X	X		X									Water, debris	

7 SUBSURFACE OILING CONDITIONS														use letter for ZONE location plus Number of pit or trench — e.g., "A1"			
TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes/No	SUBST. TYPE(S)	
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR					NO

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Oiled Band Heights: Zone A - 10cm

Cleanup Recommendations: For substrates with oiling greater than stain, trim oiled vegetation; wipe large oiled debris; remove small oiled debris; wipe oiled trees. No treatment for stained substrates is recommended.

STR to be developed.

(for ALL sub-segments record: sub-segment ID, length, length surveyed, and GPS start/end fixes)

Sketch (Yes/No) Photos (Yes/No (Roll # _____ Frames _____) Video Tape Yes/No (tape# _____)



SCAT Teams 2 & 4 Survey

Segment A16 - Right Bank

13-Jul-2011



Legend

 Oiling Zones

 Segment Boundaries

DB/G/SC

RIVER BANK OILING SUMMARY FORM for **Silvertip Pipeline Incident**

1 GENERAL INFORMATION		Date (dd/mm/yy) 14-Jul-2011	Time (24h): std / daylight 1238 hrs to 1300 hrs	Water Level low - mean - bankfull - <u>overbank</u> falling - steady - rising
Segment/Reach ID: A16 Left Bank / <u>Right Bank</u> / Island				
Operations Division: A				
Survey by: <u>Foot</u> / ATV / Boat / Helicopter / Overlook /		Sun / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp + / - <u>32</u> deg C

2 SURVEY TEAM # 2 & 4	name	organization	contact phone number
Andrew Milanes <i>AMM</i>		Polaris	
Tom Freeman <i>TF</i>		Polaris	
Andrew Johnson <i>AJ</i>		USCG	
Travis Olson <i>TO</i>		USCG	
Aaron Anderson <i>AA</i>		MTDEQ	406-841-5049
Darrick Turner <i>DT</i>		MTDEQ	406-444-1504

3 SEGMENT Total Segment/Reach Length _____ m Segment/Reach Length Surveyed 452 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud _____ Sand _____ Mixed S _____ Pebble/Cobble _____ Boulder _____ Peat/Organic _____ Vegetated Bank: P Wooded Upland: S

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: _____ Est Height _____ m canyon _____ manmade _____ meander _____ confined or leveed _____ Substrate Type: mixed

Sloped: (>5°)(15°)(30°) straight P braided S oxbow _____ flood plain valley _____ Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m 133m est. water depth: <1m 1-3m 3-10m >10m _____ m

shoal(s) present Y/N point bar present Y/N bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: falling — same — rising

5 OPERATIONAL FEATURES Suitable backshore staging Y/N Access: Direct from backshore Y/N Alongshore from next segment Y/N

Debris: Y/N oiled Y/N amount _____ bags or 1 trucks access restrictions

Oiled trees/shrubs Y/N River Current strong Y/N Other Features:

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

OIL ZONE ID	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER							SUBST. TYPE(S)		
	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC	SR	AP		NO	
A				X	420	55	<1			X	X		X									Grass, trees, debris
B				X	30	10	55	X	X	X			X									Grass, trees, debris
C				X	2	1	70	X	X	X												Water, debris

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench — e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR				

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Oiled Band Heights: Zone A - 3cm; Zone B - 20

Cleanup Recommendations: For substrates with oiling greater than stain, trim oiled vegetation; wipe large oiled debris; remove small oiled debris; wipe oiled trees. No treatment for stained substrates is recommended.

STR to be developed.

(for ALL sub-segments record: sub-segment ID, length, length surveyed, and GPS start/end fixes)

Sketch (Yes/No) Photos (Yes/No (Roll # _____ Frames _____)) Video Tape Yes/No (tape# _____)

4040-4041, 4068-4098 (Milanes); 0367-0393 (Freeman)

Handwritten initials



SCAT Teams 1 & 2 Survey

Segment A16 - Right Bank

14 July 2011



Legend

- Segment Boundaries
- Oiling Zones

DB

1 GENERAL INFORMATION		Date (dd/mm/yy)	Time (24h): std / daylight	Water Level
Segment/Reach ID: <u>A16</u> Left Bank / Right Bank / Island <u>(C)</u>		<u>22/08/11</u>	<u>10:25</u> hrs to <u>10:50</u> hrs	low - mean - bankfull - overbank
Operations Division: <u>A</u>				<u>(falling)</u> steady - rising
Survey by: <u>(Foot)</u> / <u>(ATV)</u> / <u>(Boat)</u> / Helicopter / Overlook / _____		<u>(Sun)</u> / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp + / - _____ deg C

2 SURVEY TEAM # <u>3</u>		Name	Organization	Signature
		<u>Todd Farrar</u>	<u>Polaris</u>	<u>Todd Farrar</u>
		<u>Rachelle Thompson</u>	<u>EPA</u>	<u>Rachelle Thompson</u>
		<u>Jay Watson</u>	<u>FWP</u>	<u>Jay Watson</u>

3 SEGMENT Total Segment/Reach Length _____ m Segment/Reach Length Surveyed ~~296~~ 296 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud _____ Sand S Mixed _____ Pebble/Cobble P Boulder _____ Peat/Organic _____ Vegetated Bank: _____ Wooded Upland: _____

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: _____ Est Height _____ m canyon _____ manmade _____ meander _____ confined or leveed _____ Substrate Type: Silt

Sloped: (>5°)(15°)(30°) straight _____ braided P oxbow _____ flood plain valley _____ Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m 160m est. water depth: <1m (1-3m) 3-10m >10m _____ m

shoal(s) present (Y) / N point bar present (Y) / N bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: (falling) - same - rising

5 OPERATIONAL FEATURES Suitable backshore staging Y / (N) Access: Direct from backshore Y / (N) Alongshore from next segment (Y) / N

Debris: (Y) / N oiled (Y) / N amount 1 bags or _____ trucks access restrictions

Oiled trees/shrubs Y / (N) River Current strong (Y) / N Other Features:

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

1775
1776
1777

OIL ZONE ID	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER							SUBST. TYPE(S)		
	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC	SR	AP		NO	
A		X			17	9	1															Wood
B		X			225	51																X Cobble
C		X			71	86																X Cobble

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench - e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR				

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Overbank Survey Required Y / N Overbank Survey Completed Y / N Shoreline Survey Completed Y / N

New Emerging Islands

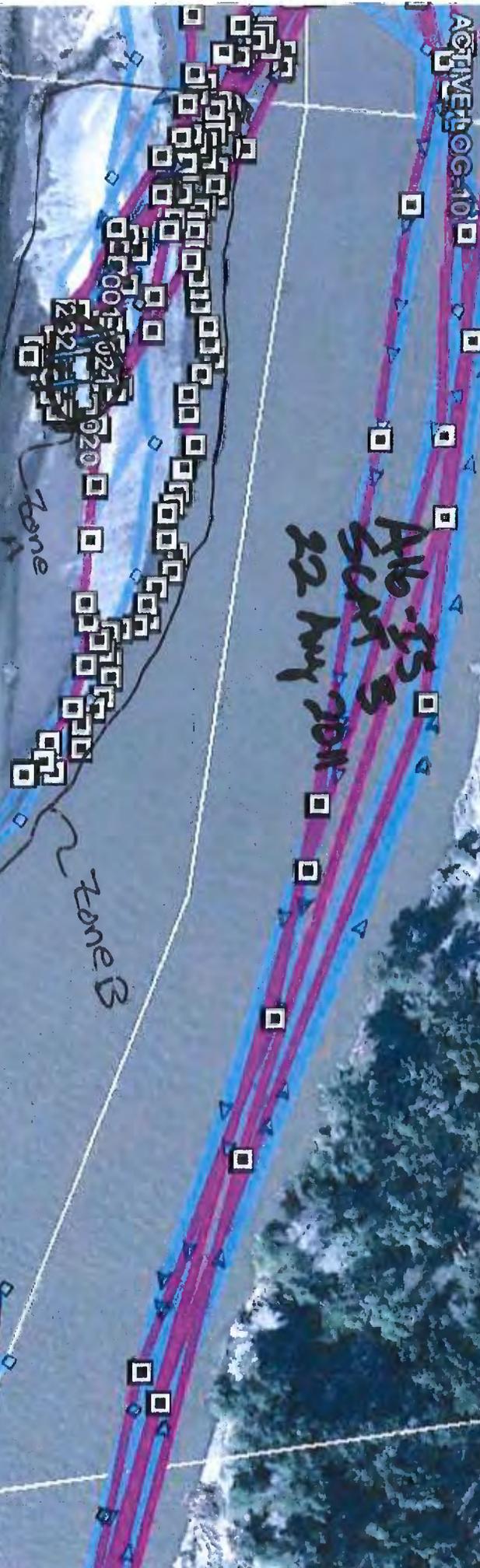
Zone A - wood debris pile with coat of oil that was transferable - we had a Hotshot Team who removed the oiling - No further treatment required

Zones B & C - No oiling observed - no further treatment

Sketch Yes / No Photos Yes / No Frames _____ Photographer _____

ACTIVE LOG 10

A16-15
SCAR 5
22 May 2011



A16-RB

Segment
A16 Island

Zone 1

D112
D112/SC

RIVER BANK OILING SUMMARY FORM for Silvertip Pipeline Incident

1 GENERAL INFORMATION		Date (dd/mm/yy) 11-Jul-2011	Time (24h): std / daylight 1058 hrs to 1059 hrs	Water Level low - mean - bankfull - <u>overbank</u> falling - steady - rising
Segment/Reach ID: A16 <u>Left Bank</u> / Right Bank / Island				
Operations Division: A				
Survey by: Foot / ATV / <u>Boat</u> / Helicopter / Overlook / _____		Sun / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp + / - <u>29.4</u> deg C

2 SURVEY TEAM # 2 & 4	name	organization	contact phone number
Andrew Milanes		Polaris	
Tom Freeman		Polaris	
Andrew Johnson		USCG	
Travis Olson		USCG	

3 SEGMENT Total Segment/Reach Length _____ m Segment/Reach Length Surveyed 357 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud _____ Sand _____ Mixed S _____ Pebble/Cobble _____ Boulder _____ Peat/Organic _____ Vegetated Bank: P Wooded Upland: S

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: _____ Est Height _____ m canyon _____ manmade _____ meander _____ confined or leveed _____ Substrate Type: mixed

Sloped: >5°(15°)(30°) straight P braided S oxbow _____ flood plain valley _____ Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m 133m est. water depth: <1m 1-3m 3-10m >10m _____ m

shoal(s) present Y/N point bar present Y/N bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: falling — same — rising

5 OPERATIONAL FEATURES Suitable backshore staging Y/N Access: Direct from backshore Y/N Alongshore from next segment Y/N

Debris: Y/N oiled Y/N amount _____ bags or _____ trucks access restrictions

Oiled trees/shrubs Y/N River Current strong Y/N Other Features: _____

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

OIL ZONE ID	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER					SUBST. TYPE(S)				
	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC		SR	AP	NO	
A			X		357	1															X	Grass, trees, debris

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench — e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR				

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Cleanup Recommendations: No oil observed along river channel margin

(for ALL sub-segments record: sub-segment ID, length, length surveyed, and GPS start/end fixes)

Sketch (Yes/No) Photos Yes/No (Roll # _____ Frames _____) Video Tape Yes/No (tape# _____)



SCAT Teams 2 & 4 Survey

Segment A16 Left Bank

11-Jul-2011



Legend

 Oil Zones

 Segment Boundaries

TR1/G

D13/G

RIVER BANK OILING SUMMARY FORM for Silvertip Pipeline Incident

1 GENERAL INFORMATION		Date (dd/mm/yy) 05/09/11	Time (24h): std / daylight 1030 hrs to 1230hrs	Water Level low - <u>mean</u> - bankfull - overbank falling - steady - rising
Segment/Reach ID: <u>A16</u> <input checked="" type="radio"/> Left Bank <input type="radio"/> Right Bank / Island		Operations Division: <u>A</u>		
Survey by: <u>Foot</u> / ATV / Boat / Helicopter / Overlook /		Sun / Clouds / Fog / Rain / Snow / Windy / Calm		Air Temp +/- <u>22</u> deg C

2 SURVEY TEAM # 2	Name	Organization	Signature
	Pete Lee	Polaris	<i>[Signature]</i>
	Lee Burroughs	MTFWP	<i>[Signature]</i>
	Steve Merritt	USEPA	<i>[Signature]</i>

3 SEGMENT Total Segment/Reach Length 360 m Segment/Reach Length Surveyed 360 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud _____ Sand _____ Mixed X _____ Pebble/Cobble _____ Boulder _____ Peat/Organic _____ Vegetated Bank: P Wooded Upland: S

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: _____ Est Height _____ m canyon _____ manmade _____ meander _____ confined or leveed _____ Substrate Type: _____

Sloped: (>5°)(15°)(30°) _____ straight _____ braided X oxbow _____ flood plain valley X Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m m est. water depth: <1m 1-3m >10m m

shoal(s) present Y point bar present Y bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: falling — same — rising

5 OPERATIONAL FEATURES

Suitable backshore staging Y Access: Direct from backshore Y Alongshore from next segment Y N

Debris: Y / N oiled Y / N amount _____ bags or _____ trucks Access restrictions: _____

Oiled trees/shrubs Y / N River Current strong Y / N Other Features: _____

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

OIL ZONE	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER						SUBST. TYPE(S)				
	ID	MS	LB	UB	OB	Length m	Width m	Distrib. %	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC		SR	AP	NO	
A					X	360	170															X	Grass, trees, debris

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench -- e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE	SUBSURFACE OIL CHARACTER					WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)								
	MS	LB	UB	OB			SAP	OP	PP	OR	OF					TR	NO						

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

Overbank Survey Required / N Overbank Survey Completed / N Shoreline Survey Completed / N

Oil height:

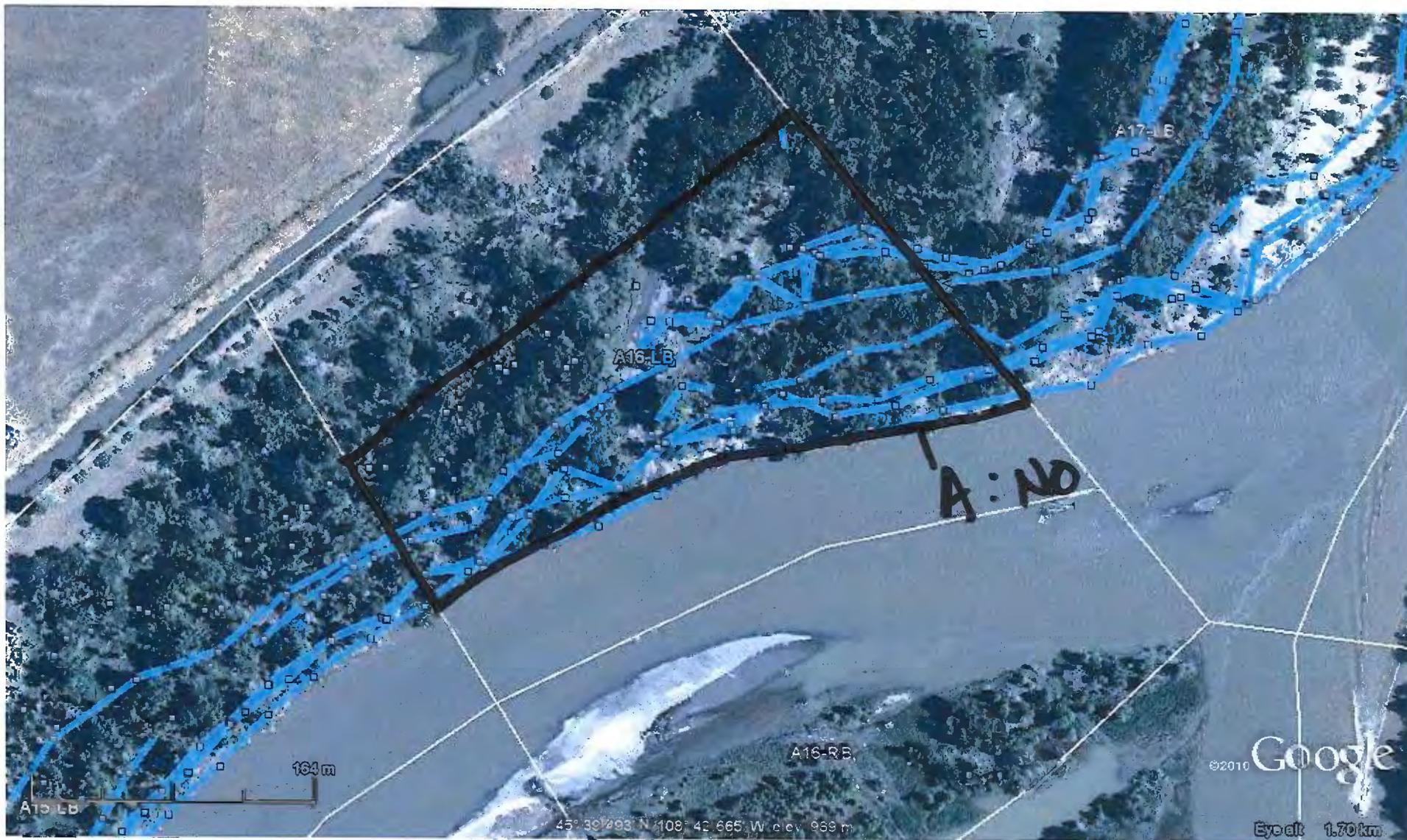
Treatment recommendations:

Zone A : No oil ; no treatment required

Zone :

Ops Hot Shot team (Ed Jessup)

Sketch Yes / No Photos Yes / No Frames _____ Photographer _____



A16 LB
T2 9/5/11



Appendix C

Applicable Compiled Treatment
Recommendations

Compiled Treatment Recommendations – 1 (Revised)

SCAT Segments Covered:

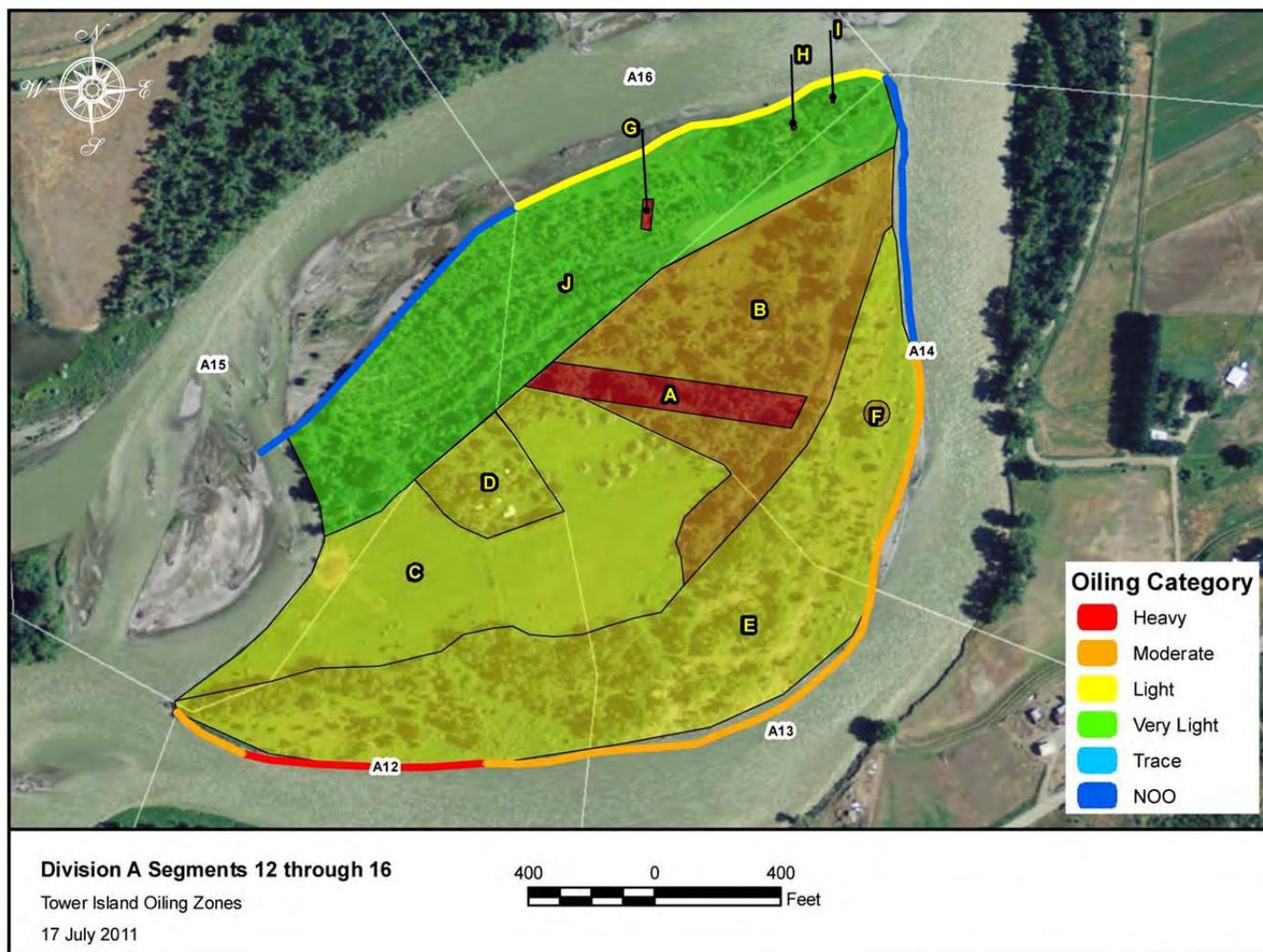
A12 (Left Bank), A13 (Left Bank), A14 (Left Bank), A15 (Right Bank), A16 (Right Bank)

SCAT Survey Dates: 11-Jul-2011, 13-Jul-2011, 14-Jul-2011 (See attached Riverine SCAT Forms)

Refer to current approved treatment methods:

#1 Cutting of Vegetation, #2 Dead Vegetation and Small Debris, #3 Large Woody Debris, #6 Sorbent Use, #9 Fixatives.

Consult with Cultural Heritage representatives for guidance on areas that have been identified.



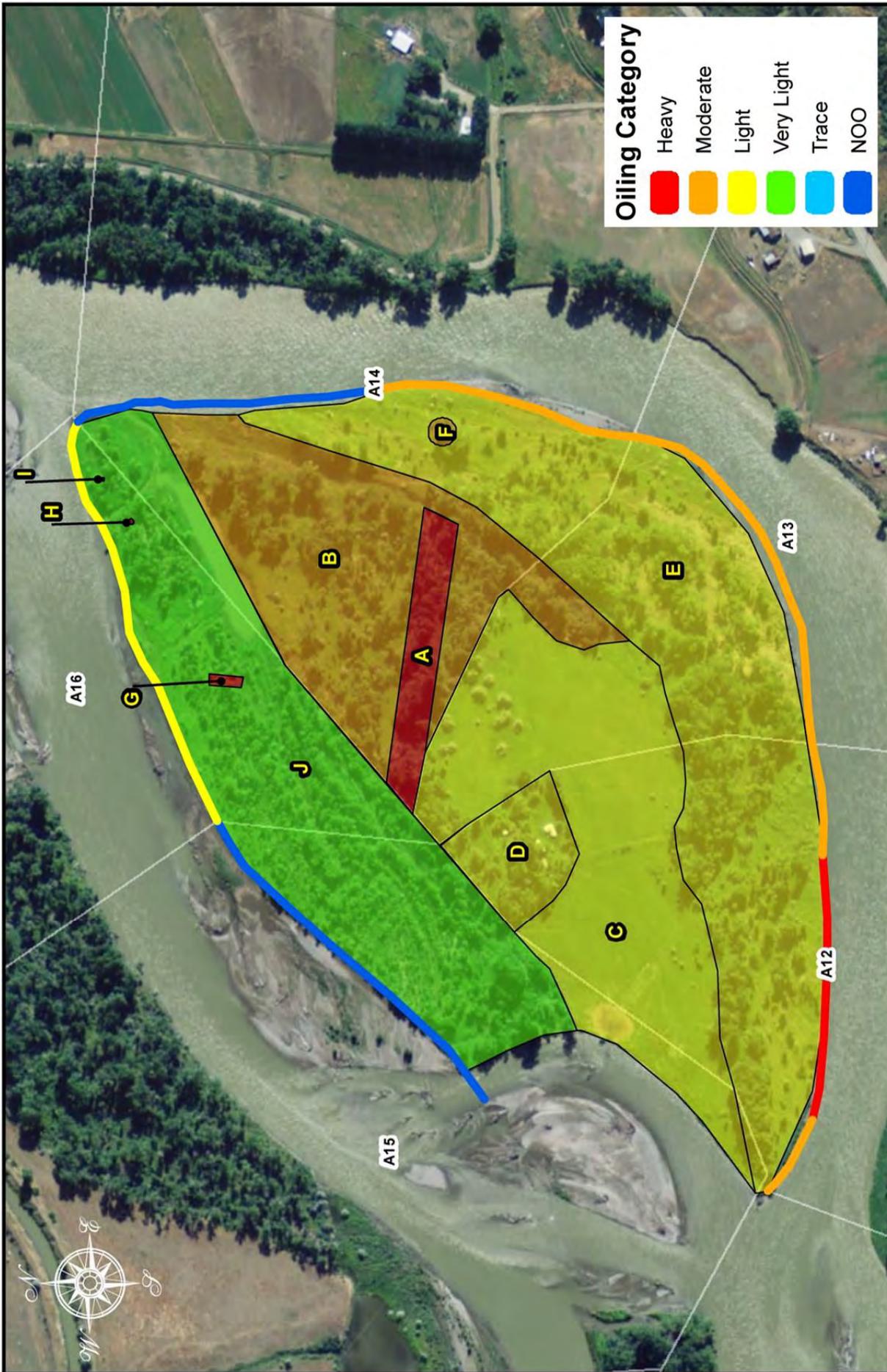
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Zone A:

Primary Oiling Conditions: ~45% distribution of oiled debris (coat/cover), pooled oil on water, oil coat/stain on vegetation. Note: Quantity of oil-coated debris exceeds 10 roll-offs.

Cleanup Recommendations: Remove pooled oil with sorbents. Cut and remove oil-coated vegetation smaller than 1" diameter. Do not cut grass shorter than 1". Remove oil-coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris. The size and quantity of oil coated debris in this zone may warrant the use of fixatives. Consult SCAT Ops Liaison for use and applicability.





Division A Segments 12 through 16

Tower Island Oiling Zones

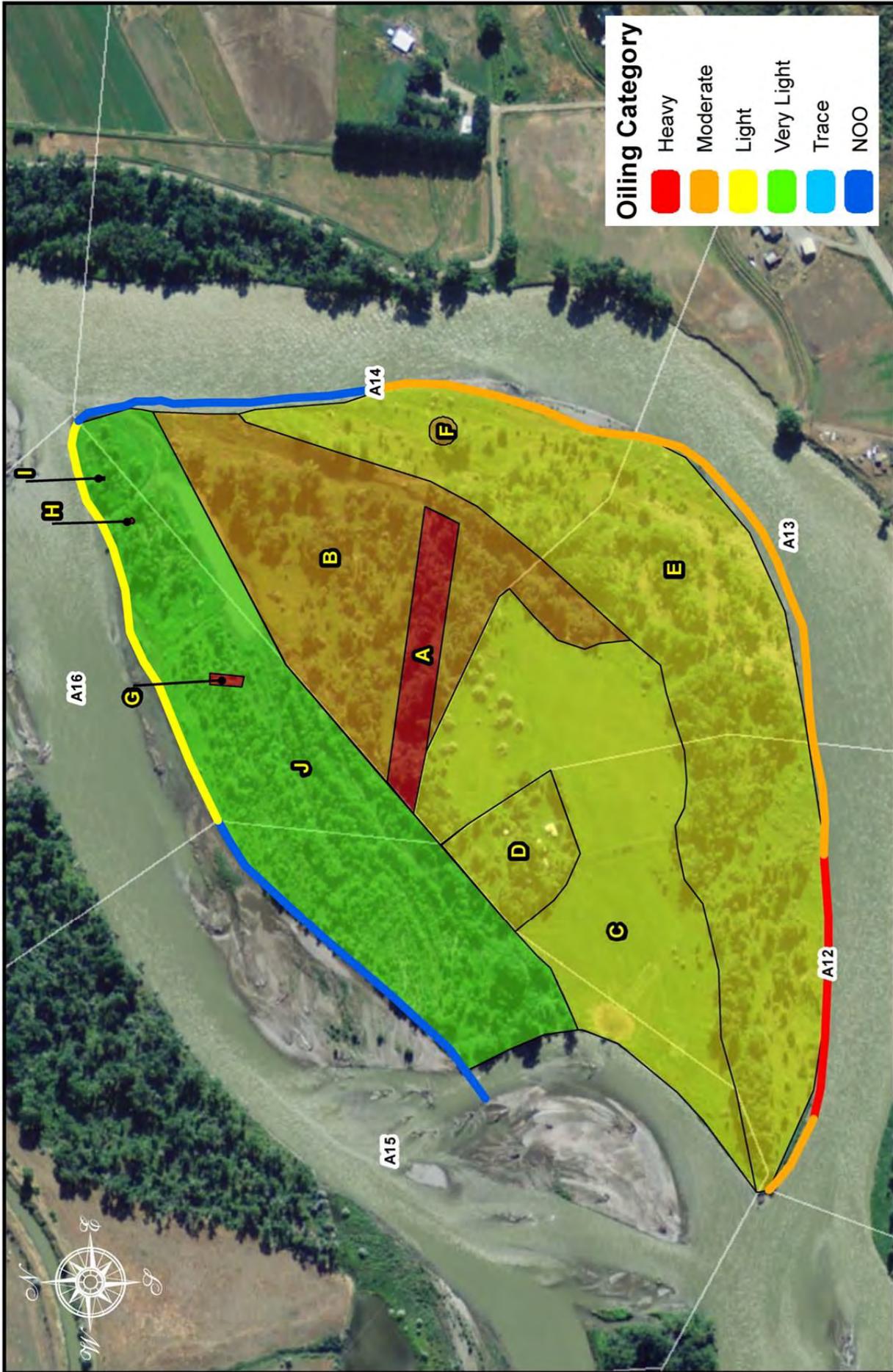
17 July 2011

Zone B:

Primary Oiling Conditions: ~15% distribution of oiled debris (coat) and oil coat/stain on vegetation.

Cleanup Recommendations: Cut and remove oil coated vegetation smaller than 1" diameter. Wipe oil coated vegetation larger than 1" diameter. Only remove oil coated debris smaller than 4" diameter. Wipe oil coated debris larger than 4" diameter.





Division A Segments 12 through 16

Tower Island Oiling Zones

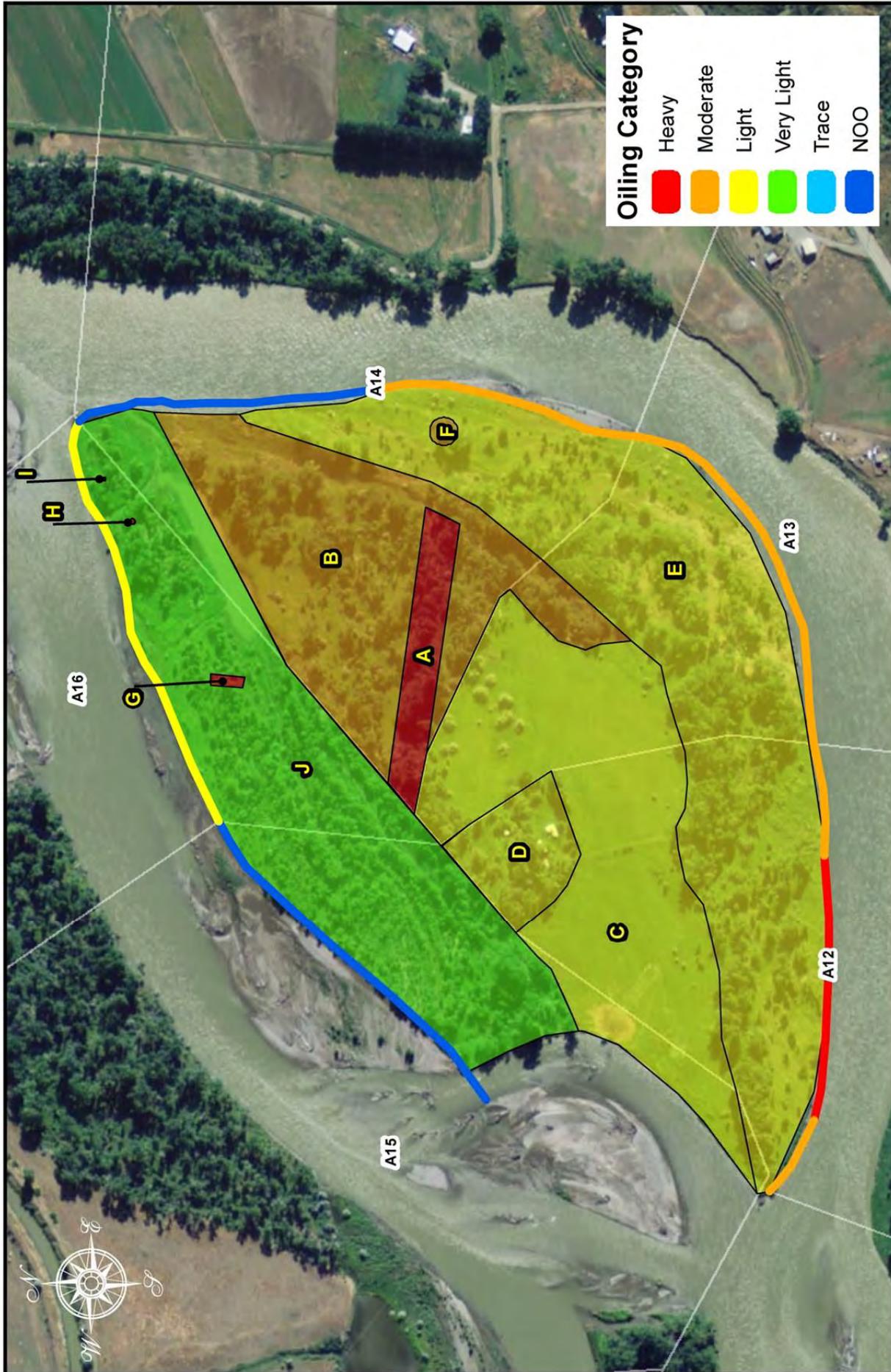
17 July 2011

Zone C:

Primary Oiling Conditions: ~25% distribution of oil coat/stain on vegetation in field.

Cleanup Recommendations: Cut and remove oil coated vegetation smaller than 1" diameter. Portions of this zone contain cultural resources requiring recordation and assessment. Refer to the Cultural Heritage field teams for guidance.





Division A Segments 12 through 16

Tower Island Oiling Zones

17 July 2011

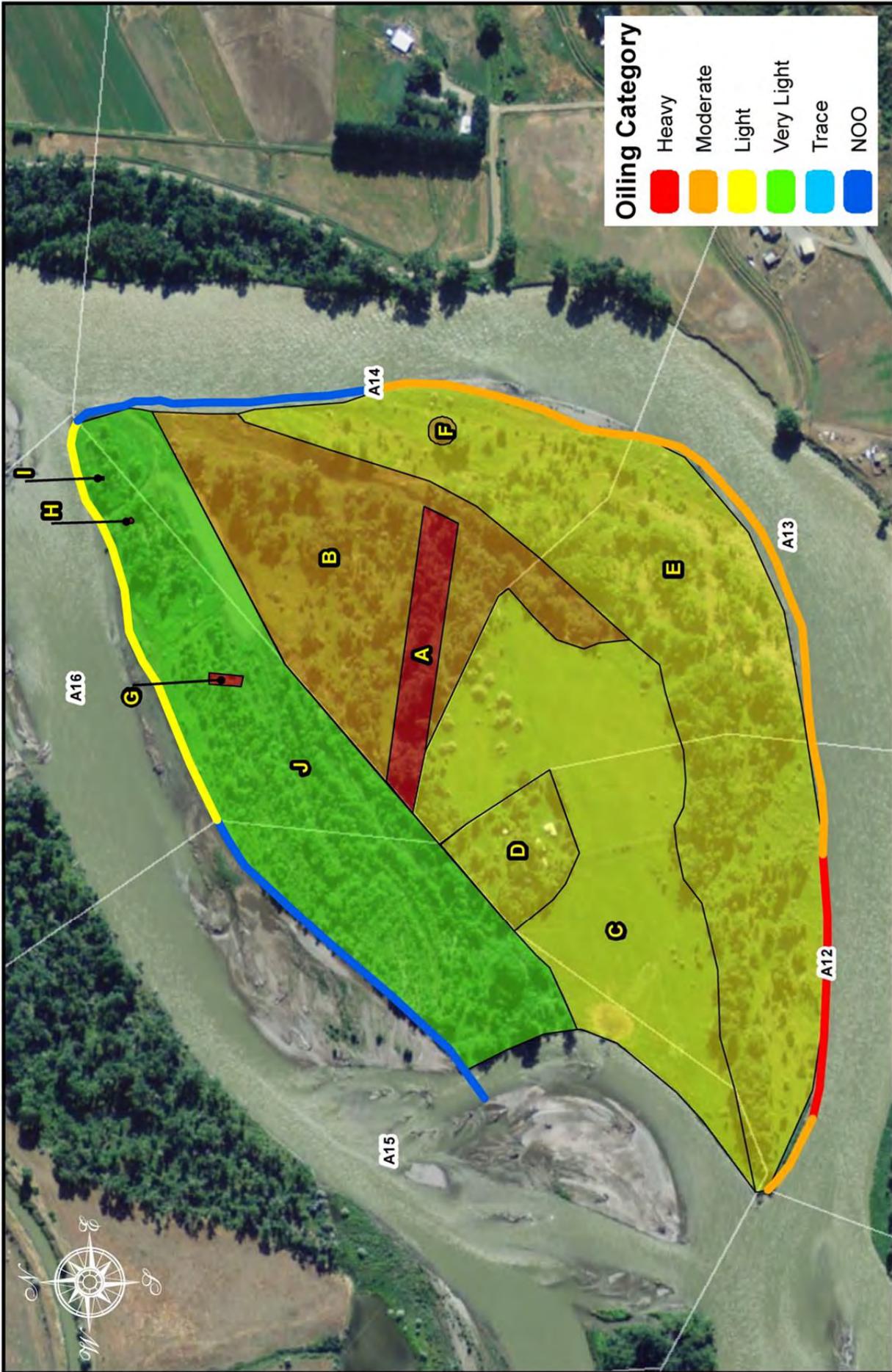


Zone D:

Primary Oiling Conditions: Private homestead consisting of living quarters, barns, and other farm structures. ~5% distribution of oil cover/coat/stain on vegetation, trees, debris, and structures.

Cleanup Recommendations: Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris. Wipe oil-coated structures. In consideration of private property, this zone may require treatment of oil stained vegetation, debris, and structures in coordination with the land owner. Portions of this zone contain cultural resources requiring recordation and assessment. Refer to the Cultural Heritage field teams for guidance.





Division A Segments 12 through 16

Tower Island Oiling Zones

17 July 2011

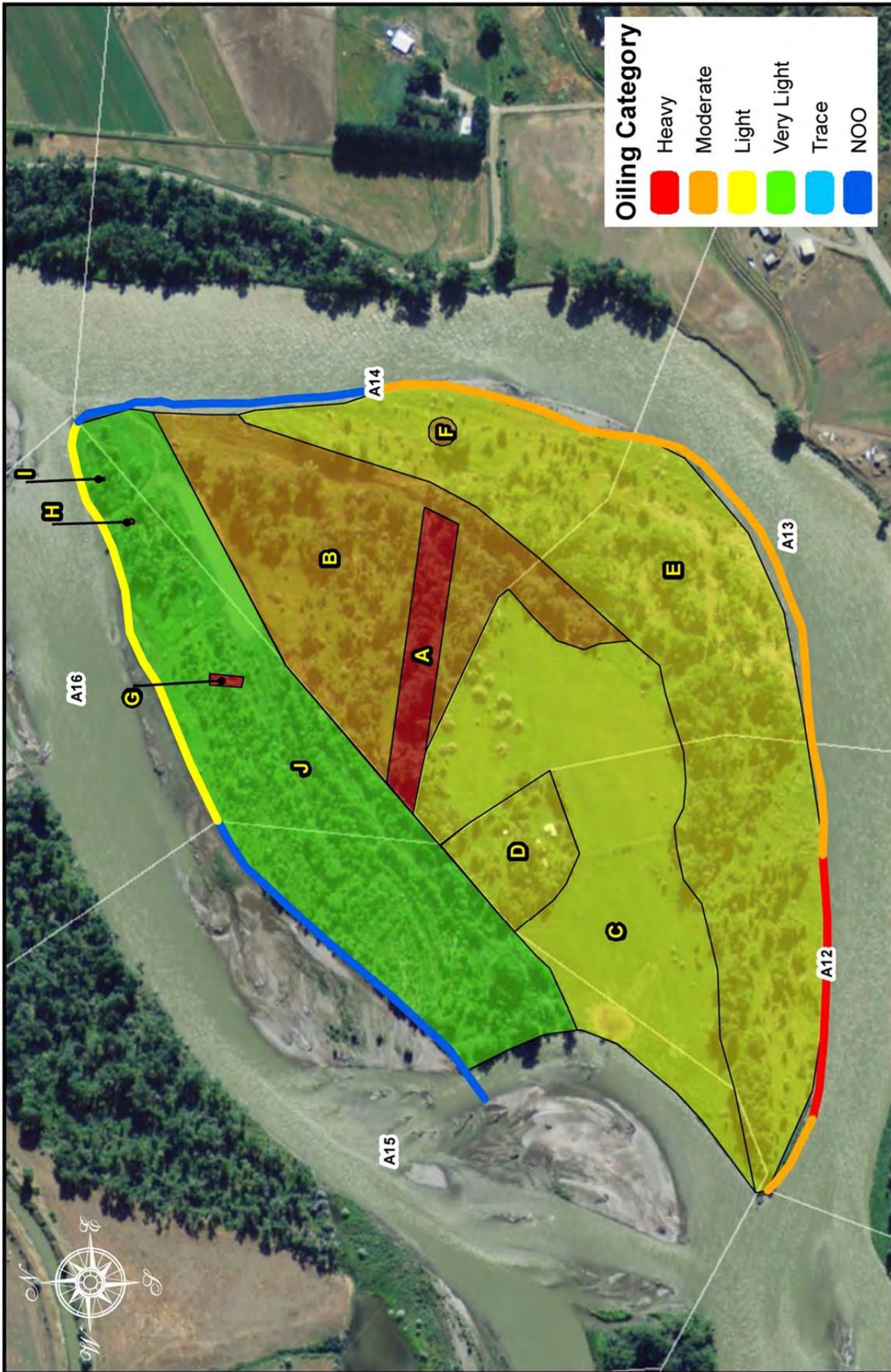


Zone E:

Primary Oiling Conditions: ~20% distribution of oil stained (primary) / coated vegetation and debris.

Cleanup Recommendations: Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

17 July 2011

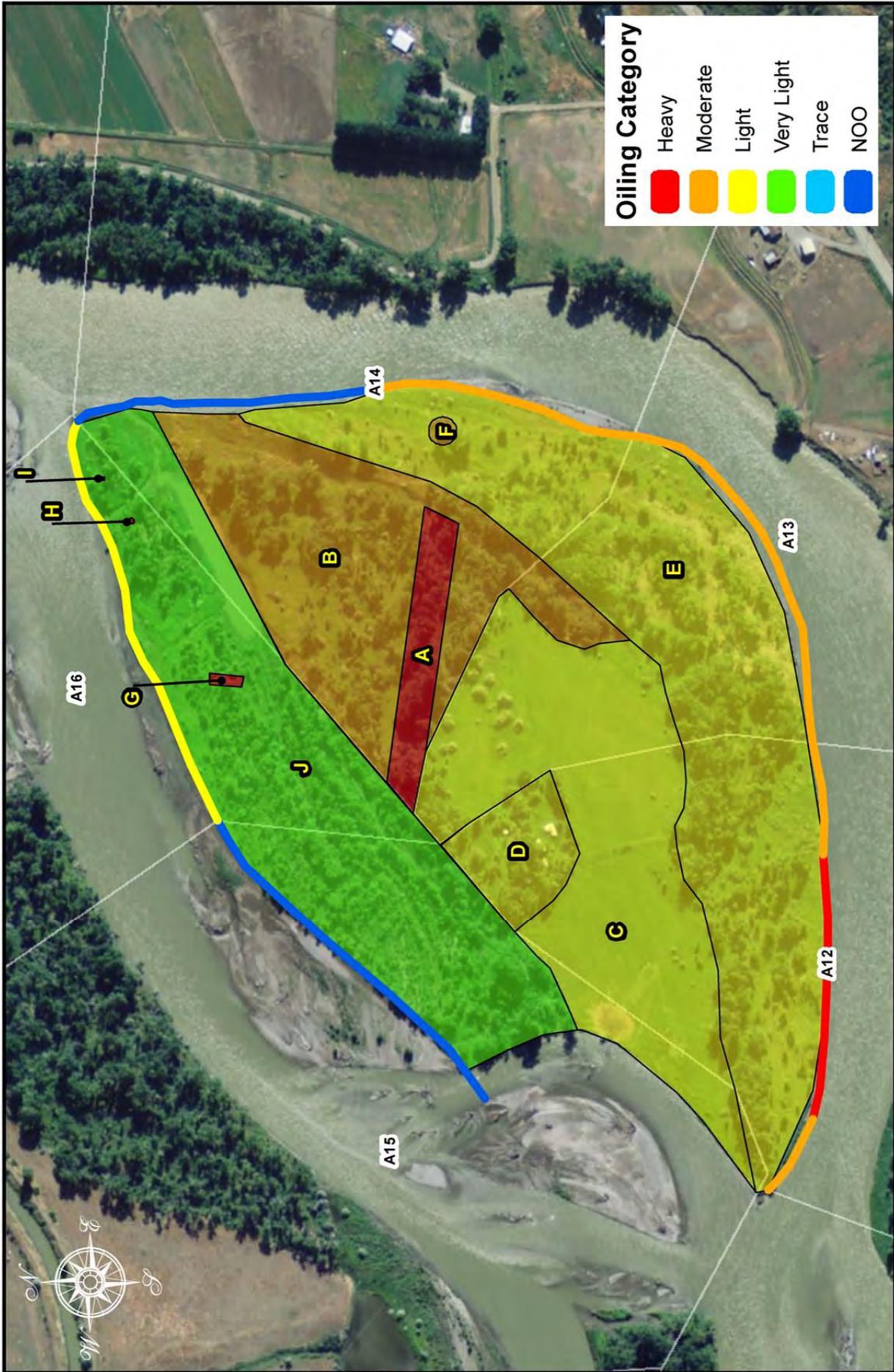


Zone F:

Primary Oiling Conditions: Discrete areas of oiled debris (coat/cover), pooled oil on water, oil coat/stain on vegetation.

Cleanup Recommendations: Remove pooled oil with sorbents. Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

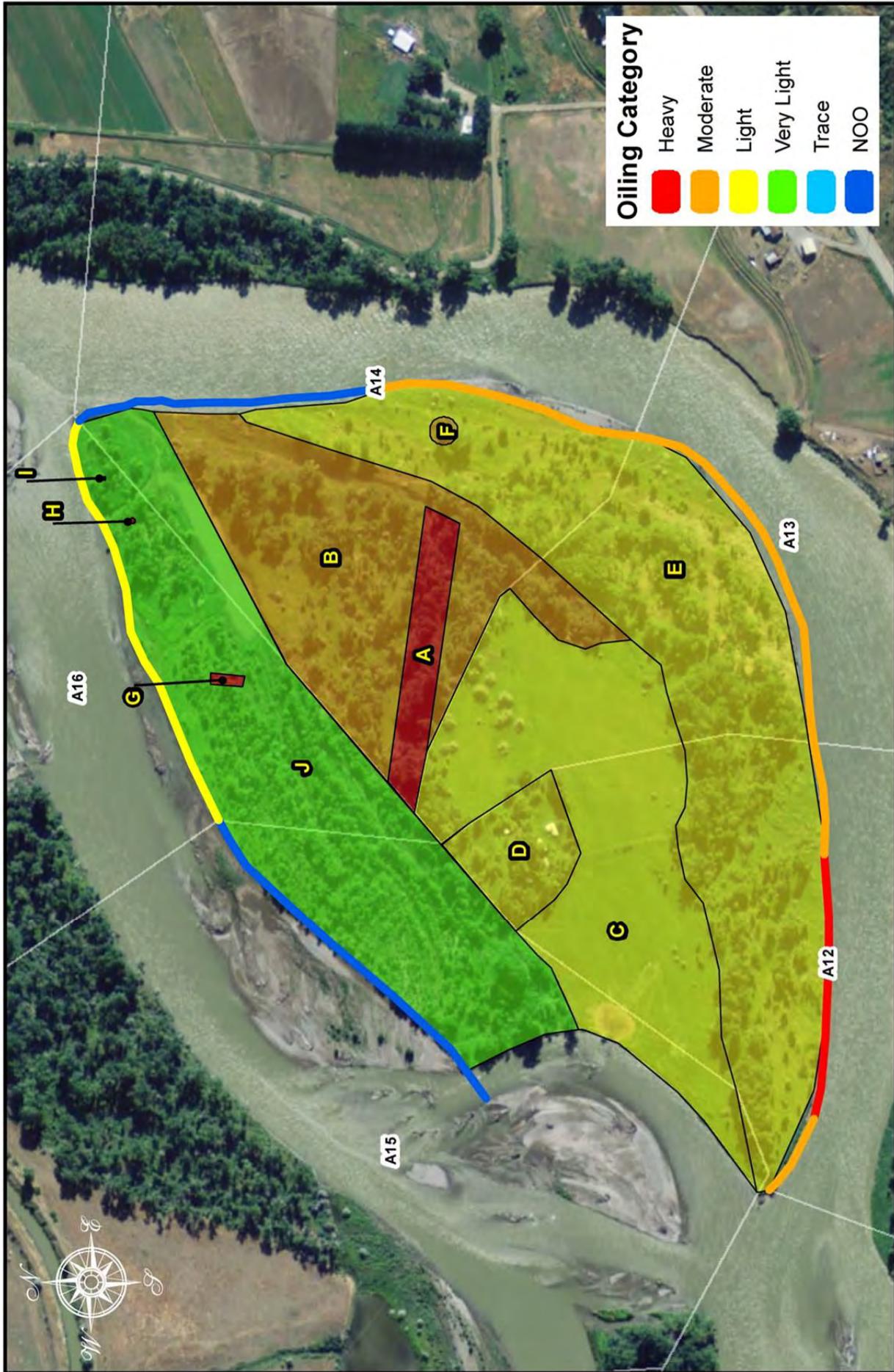
17 July 2011

Zone G:

Primary Oiling Conditions: Discrete areas of oiled debris (coat/cover), pooled oil on water, oil coat/stain on vegetation.

Cleanup Recommendations: Remove pooled oil with sorbents. Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

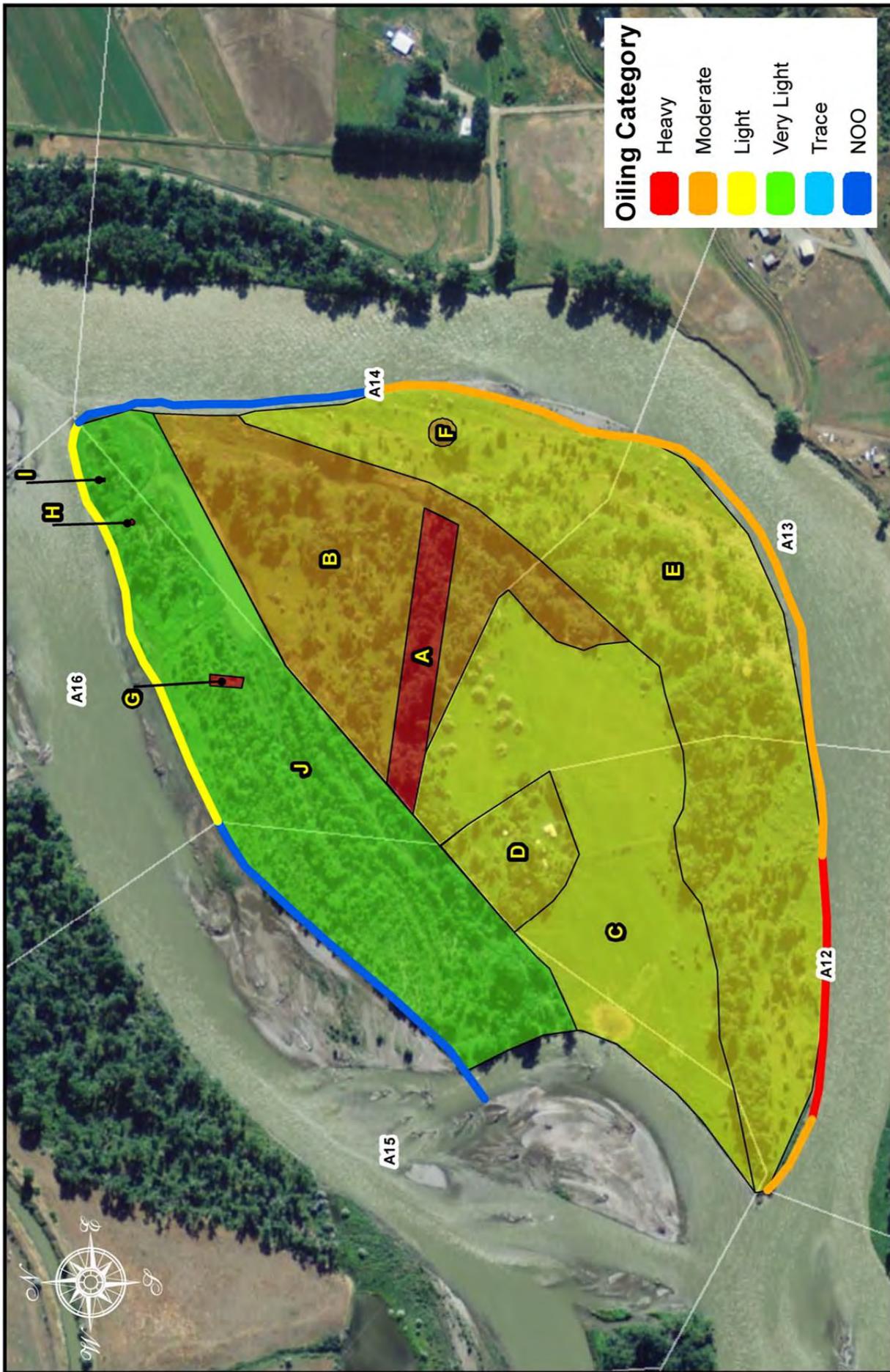
17 July 2011

Zone H:

Primary Oiling Conditions: Discrete areas of oiled debris (coat/cover), pooled oil on water, oil coat/stain on vegetation.

Cleanup Recommendations: Remove pooled oil with sorbents. Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

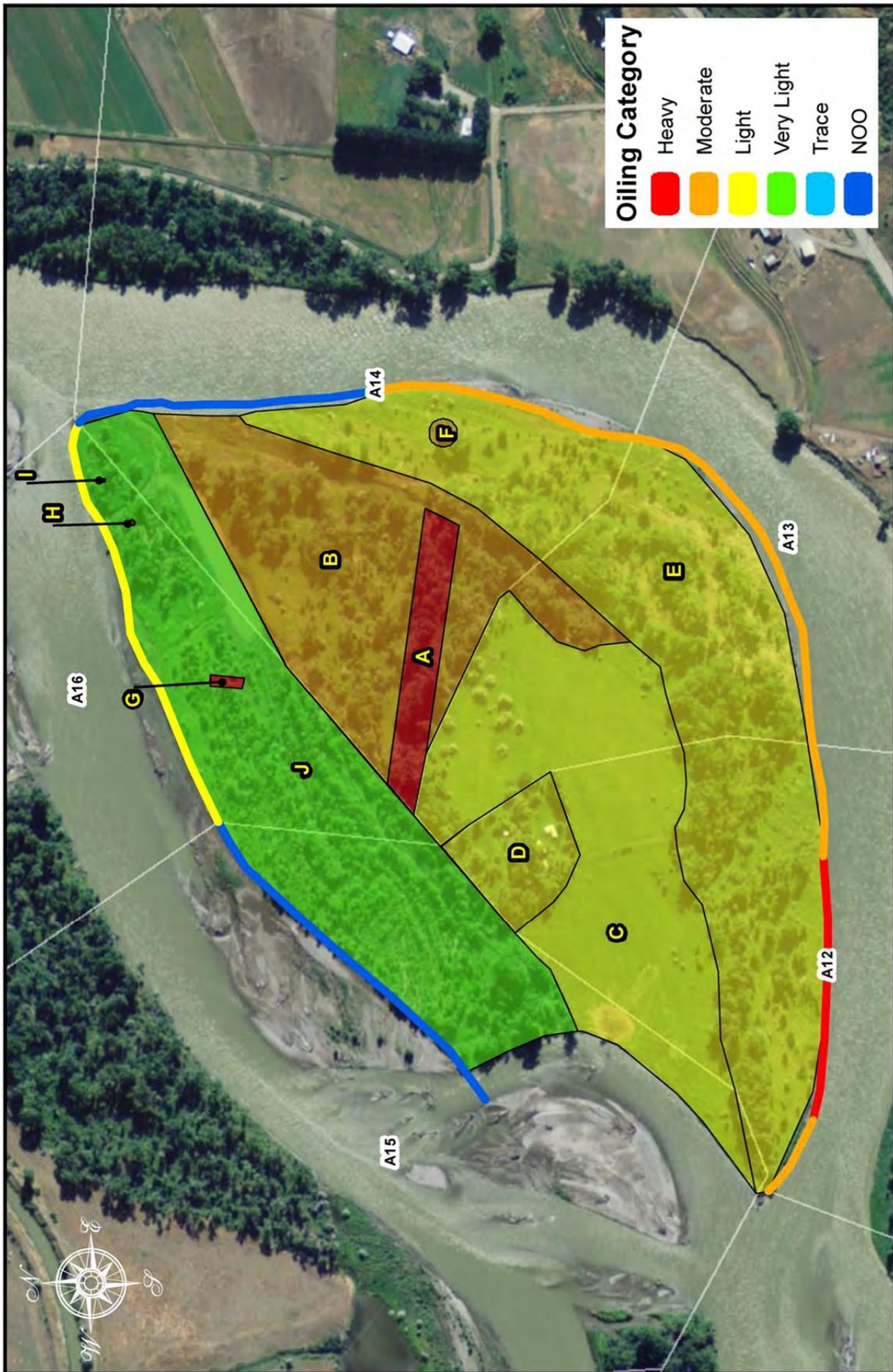
17 July 2011

Zone I:

Primary Oiling Conditions: Discrete areas of oiled debris (coat/cover), pooled oil on water, oil coat/stain on vegetation.

Cleanup Recommendations: Remove pooled oil with sorbents. Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

17 July 2011

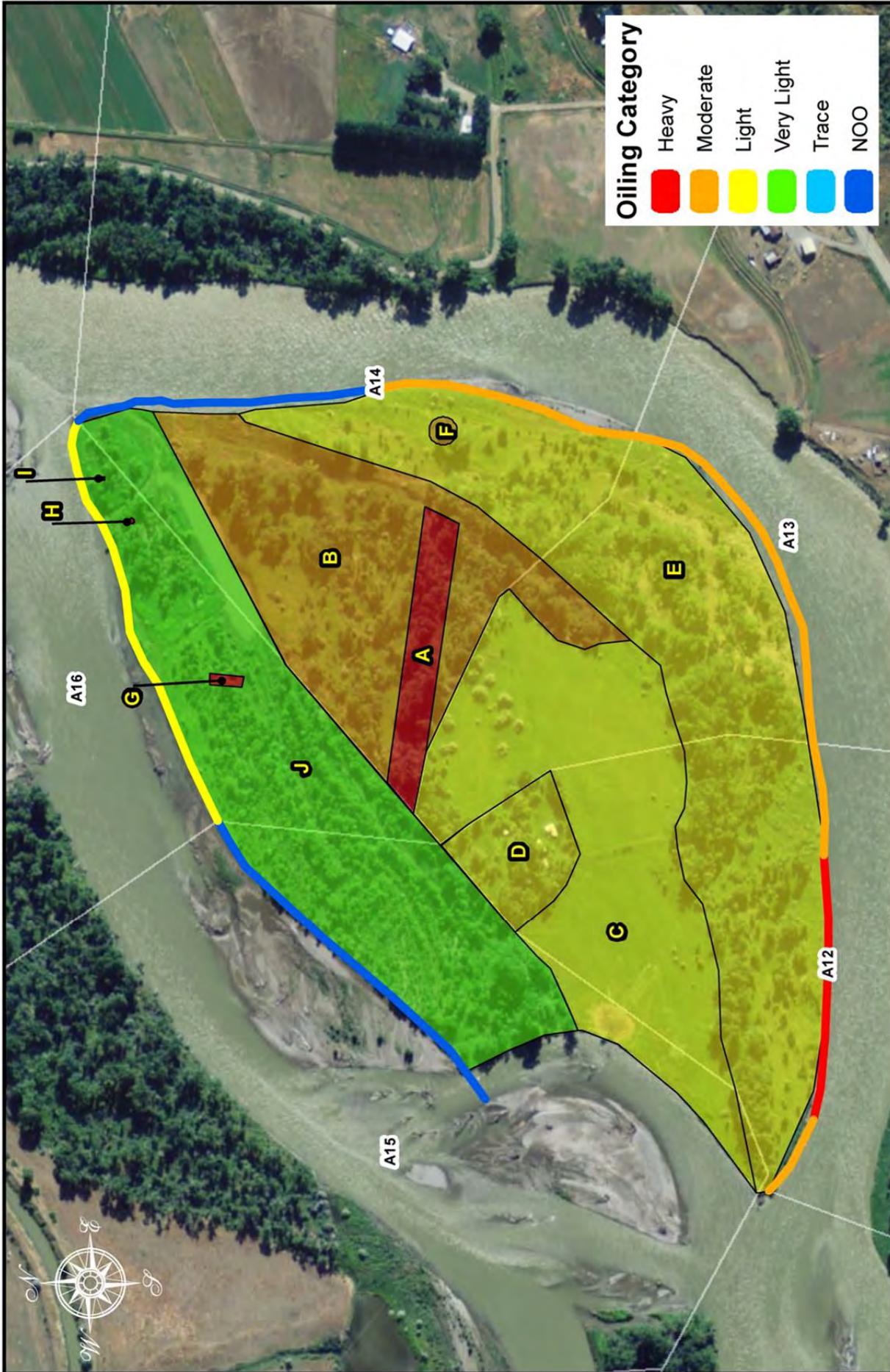


Zone J:

Primary Oiling Conditions: <1% distribution of narrow (~5cm) band of oil coat/stain on vegetation and trees. <1% distribution of oil coated debris.

Cleanup Recommendations: Cut and remove oil coated vegetation smaller than 1" diameter. Remove oil coated debris smaller than 4" diameter. Wipe larger oil coated vegetation and debris.





Division A Segments 12 through 16

Tower Island Oiling Zones

17 July 2011



Appendix D

Pre-Inspection Survey Transmittal

Linson

SCAT – Pre Inspection Survey Transmittal (PIST) Memo

Survey Date: 26 August 2011

Segment: A16RB

Team: SCAT Liaison Lauren Glushik- Polaris Signed: 

Observer _____ Signed: _____

Observer _____ Signed: _____

Observer _____ Signed: _____

Segment meets criteria? YES NO

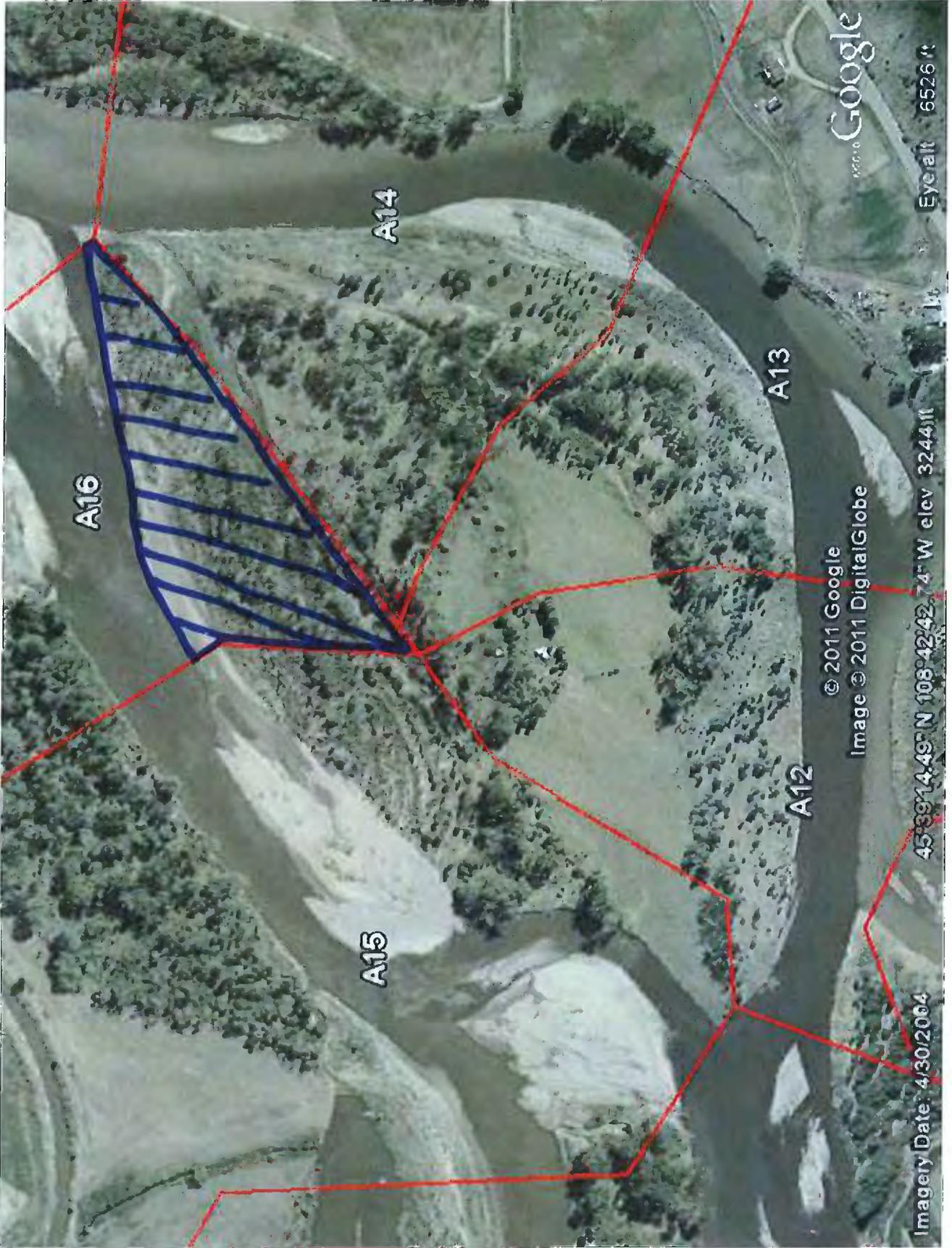
RBOS attached? YES NO

If NO:

Location Sketch attached? YES NO

CTR continue? YES NO

Comments:



A16

A14

A13

A15

A12

Google

Eye alt 6526 ft

© 2011 Google
Image © 2011 DigitalGlobe

45°39'14.49" N 108°42'42.74" W elev 3244 ft

Imagery Date: 4/30/2004



Appendix E

Post-Inspection Survey Transmittal

**A Post-Inspection Survey
was not conducted for this area**



Appendix F

Final SCAT Survey Forms and
Sketches

RIVER BANK OILING SUMMARY FORM for Silvertip Pipeline Incident

DB/G

R

1 GENERAL INFORMATION		Date (dd/mm/yy) 26/AUG/2011	Time (24h): std / daylight 10:50 hrs to 11:40 hrs	Water Level low - mean - bankfull - overbank falling - steady - rising
Segment/Reach ID: A16 Left Bank / Right Bank / Island				
Operations Division: A16 RB				
Survey by: Foot / ATV / Boat / Helicopter / Overlook /		Sun / Clouds / Fog / Rain / Snow / Windy / Calm	Air Temp +/- 29 deg C	

2 SURVEY TEAM # 3 & 5	name	organization	contact phone number
Merlo Gauvreau		Polaris	
Tom Freeman		Polaris	
Ariel Blanc		Polaris	
Daniel Elefant		Cardno ENTRIX	
Larisa Leonova		EPA	
Rachelle Thompson		EPA	
Donnie McCurry		DEQ	
Darrick Turner		DEQ	
Ernie McKenzie		BLM	

3 SEGMENT Total Segment/Reach Length _____ m Segment/Reach Length Surveyed 396 m

Start GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min. Datum: _____

End GPS: LATITUDE _____ deg. _____ min. LONGITUDE _____ deg. _____ min.

4A RIVER BANK TYPE SELECT only one primary (P) shoreline type and any number of secondary (S) types. CIRCLE those OILED

Bedrock: Cliff/Ramp _____ Shelf _____ Manmade: Solid _____ Permeable _____ (type) _____ Wetland: Swamp _____ Bog/Fen _____ Marsh _____

Sediment Bank: Clay/Mud S Sand P Mixed _____ Pebble/Cobble S Boulder _____ Peat/Organic _____ Vegetated Bank S Wooded Upland: _____

Sediment Flat: Clay/Mud _____ Sand _____ Mixed/Coarse _____ Other: _____ If snow and ice use Winter River SOS

4B RIVER VALLEY CHARACTER select as appropriate complete for primary

Cliff or Bluff: Est Height 2 m canyon _____ manmade _____ meander P confined or leveed _____ Substrate Type: sand/sed

Sloped: (>5°)(15°)(30°) straight _____ braided S oxbow _____ flood plain valley _____ Forested / Vegetated / Bare

4C RIVER CHANNEL CHARACTER circle or select as appropriate

est. width: <1m 1-10m 10-100m >100m m est. water depth: <1m 1-3m 3-10m >10m m

shoal(s) present Y (N) point bar present Y (N) bar-shoal substrate: silt / sand / gravel / cobble / boulder / bedrock / debris

seasonal water level: low / mean / bank full / overbank flow est. change over next 7 days: falling — same — rising

5 OPERATIONAL FEATURES Suitable backshore staging Y (N) Access: Direct from backshore Y (N) Alongshore from next segment Y / N

Debris: Y / N oiled Y / N amount _____ bags or _____ trucks access restrictions: ISLAND

Oiled trees/shrubs Y / N River Current strong Y / N Other Features:

6 SURFACE OILING CONDITIONS begin with "A" in the lowest tidal zone - circle the zone/s that correspond to primary shoreline type

OIL ZONE	RIVER BANK ZONE				OIL COVER			OIL THICKNESS					OIL CHARACTER						SUBST. TYPE(S)			
					Length	Width	Distrib.	THICKNESS					CHARACTER									
	ID	MS	LB	UB	OB	m	m	%	TO	CV	CT	ST	FL	FR	MS	TB	PT	TC		SR	AP	NO
1915 A				X	396	192	<1			X	(X)							X				Veg/debris

7 SUBSURFACE OILING CONDITIONS use letter for ZONE location plus Number of pit or trench — e.g., "A1"

TRENCH or PIT NO.	RIVER BANK ZONE				MAX. PIT DEPTH cm	OILED ZONE cm-cm	SUBSURFACE OIL CHARACTER						WATER TABLE cm	SHEEN COLOUR B, R, S, N	CLEAN BELOW Yes / No	SUBST. TYPE(S)
	MS	LB	UB	OB			SAP	OP	PP	OR	OF	TR				

8 COMMENTS ecological/recreational/cultural/economic constraints - shorezone biota and wildlife observations - cleanup recommendations

ReSCAT

Zone A: Trace oiled vegetation and natural debris. Hotshot crew accompanied ReSCAT Team. Remaining transferable oil removed during ReSCAT. Segment meets operational endpoints. NFT.

(for ALL sub-segments record: sub-segment ID, length, length surveyed, and GPS start/end fixes)

Sketch Yes/No Photos Yes/No (Roll # _____ Frames _____) Video Tape Yes/No (tape# _____)

26 August Re SCAT

A16 RB

TEAM # 315



2/2



Appendix G

Completed SCAT Segment Sign-Off
Forms

COMPLETED

Silvertip Pipeline Spill
SCAT Segment Sign-Off Sheet

Operations Division: A B C
 SCAT Area Number (i.e. A12): A16
 SCAT Segment Number (i.e. A12-LB/IS/RB): A16 RB

Check if Complete:

1. Completion Date for Initial SCAT Assessment: 11-13-14 July 2011
2. Combined Treatment Recommendations (CTRs) Developed/Issued: Yes No
List CTRs Applicable to SCAT Segment: 1
3. Clean-Up Operations Conducted:
4. Meets Qualitative Approved Treatment Methods Target Endpoints: Yes No
5. SCAT Reassessment:

Rachelle Thompson Rachelle Thompson 26/08/2011
 Sign Name Print Name Date
 Federal Representative (EPA/USCG)

Donnie McCurry Donnie McCurry 26/08/2011
 Sign Name Print Name Date
 State Representative (DEQ/FWP)

[Signature] Helo Gavurean (Polaris) 26/08/2011
 Sign Name Print Name Date
 RP Representative (SCAT Contractor)

Ariel Blanc Ariel Blanc (Polaris) 26/08/2011

Once all applicable SCAT Segments (i.e. LB, RB, and IS) within a particular SCAT Area (i.e. A21) have been successfully signed-off during a formal SCAT Reassessment, the SCAT area will achieve the response endpoints and an Area Transition Report will be completed and submitted to EPA and DEQ upon completion.