

# SALE SAFETY OF BERT

#### Oil Pollution Act of 1990 (OPA-90) Emergency Action Plan - Oil Release to Waters of the State

Dickerson Generating Station 21200 Martinsburg Road Dickerson Maryland 20842

# GenOn.

#### **Dickerson Generating Station**



Three coal-fired steam units:

Unit 1 - 179 MW (net), 1959 Unit 2 - 179 MW (net), 1960 Unit 3 - 179 MW (net), 1962 Two Gas/Oil-fired GE 7F CTs

H1 CT - 147/167 MW (net), 1992 H2 CT - 147/167 MW (net), 1993 One Oil-fired Blackstart CT D1 CT - 18 MW (net), 1967



### **GenOn** OPA-90 Equipment Deployment Drill USCG PREP Guidelines

#### Purpose

The National Preparedness for Response Exercise Program (PREP) was developed to demonstrate the intent of sections of Federal Regulations under:

- Oil Pollution Act of 1990 (OPA 90),
- Federal Water Pollution Control Act (FWPCA),
- Spill response preparedness [33 U.S.C. 1321 (j)]

The PREP satisfies the exercise requirements of:

- US Coast Guard,
- Environmental Protection Agency (EPA),
- Research and Special Programs Administration (RSPA) Office of Pipeline Safety, and
- Minerals Management Service (MMS).





Planning Volumes for Oil :

Maximum Most Probable (USCG) / Medium (EPA) Discharge:

- For EPA-regulated facilities, a discharge greater than 2,100 gallons [50 barrels] and less than or equal to 36,000 gallons [858 barrels] or 10 percent of the capacity of the largest tank at the facility, whichever is less [40 CFR 112.20].
- Dickerson largest oil tank is 10,000,000 \* 10% = 1,000,000 gallons







Equipment Deployment Exercises

The requirements for the equipment deployment exercise are:

- Personnel that would normally operate or supervise the operation of the response equipment must participate in the exercise.
- Response equipment must be in good operating condition.

Dickerson has a trailer containing 1200' of river boom at Whites Ferry as the primary means of mitigating a release to the river.





Successful Completion of Government-Initiated Unannounced Exercise

The objectives in a government-initiated unannounced exercise for likely discharge include the following:

• Conducting proper notifications;

 Arrival of containment boom as specified in the approved response plan within one hour of detection of the discharge and the subsequent successful deployment;

 Arrival of oil recovery devices as specified in the approved response plan within two hours of detection of the discharge and the subsequent successful operation/simulated recovery;

Boom is to be on the water within 1 hr. and vac truck arrival wi<mark>thin 2</mark> hrs.

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First a safety meeting.....



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#### OSRO (Triumverate) work in full PPE



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#### Backing boom trailer into position on boat ramp



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Unload all boom rather than flake from trailer. If not, any snag may drag trailer into water once ferry begins to pull boom across river.



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Take one end to MD anchor point near water's edge.



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Next, bring VA end closest to boat, leaving enough slack to load extra to pull from secured anchor on boat to VA side land anchor.



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Ensure no cross overs; cables on top and bottom of boom must remain parallel and not twist once in water.



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Chain used to connect boom cable to anchoring points. A come-along used to release boom from boat anchor point, once secured to VA shore anchor.

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Loading slack onto ferry deck, and then secure to back of boat. Potential snag with ferry drive mechanism if secured to front of boat.

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Chase boat added as precaution to runaway boom or ferry...

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Ferry at VA side of river; unable to get boom to VA anchor point. Weight of ferry and water against boom caused concern for ferry cable break.



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Strong river current pushed water over boom at bottom of loop. Oil would not be held with this booming strategy.

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(left) Anchor point (MD) pulled out of ground, (right) and barely held for lower cable anchor



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Overall a successful deployment drill.

Lessons learned:

A full river crossing is difficult given the strain on a single 1200' line of boom.

Different boom strategies to be employed based on river currents, as indicated by river height. Ferry operator wants < 4' average for the 3 closest USGS gauges - Point of Rocks, Edwards Ferry & Little Falls..

On Dec. 11<sup>th</sup> they were:

Point of Rocks	4'
Edwards Ferry	6.5'
Little Falls	1.1'
AVG	<mark>3.9'</mark>



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Lessons learned:

Use smaller sections of boom above WF in a herringbone arrangement, utilizing WF landing as base of operations and recovery.







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Lessons learned:

Alternative boom strategy utilizing Mason Island.



