

Appendix H.

UPRR Hazardous Material Emergency Response Plan





UNION PACIFIC RAILROAD COMPANY

**HAZARDOUS MATERIAL
EMERGENCY RESPONSE
PLAN**

October 1, 2009

PB-20850



TO: All Union Pacific Railroad Company Employees

**FROM: R. Grimaila, Sr. VP Safety & Environment
M. Hemmer, Sr. VP Law & General Counsel**

The Union Pacific Railroad Company's Hazardous Materials Emergency Response Plan (HMERP) has been revised. The revised HMERP will become effective on October 1, 2009.

Managers must ensure that their employees receive HMERP training and that relevant training is documented in the Union Pacific Plateau system.



TO: All Union Pacific Railroad Company Employees

FROM: R. Grimaila, Sr. VP Safety & Environment
M. Hemmer, Sr. VP Law & General Counsel

Effective immediately, the Hazardous Materials Emergency Response Plan (HMERP) is amended as follows:

- The requirement for HZ-90 training is no longer required. HZ-90 is not required to support implementation of the HMERP.

For more information, contact Mark Maday at 8-544-3313.

INTRODUCTION

This Hazardous Material Emergency Response Plan (HMERP) has been established to provide emergency response information to personnel who may become involved in a hazardous materials incident. It is designed to be consistent with the emergency response plan provisions set forth by the Occupational Safety and Health Administration (OSHA) under 29 C.F.R. 1910.120(q). For purposes of this HMERP, the term “hazardous materials” shall include “hazardous materials” as defined by the U.S. Department of Transportation (DOT), and “hazardous substances and hazardous wastes” as defined by the U.S. Environmental Protection Agency (EPA). If there is any doubt concerning the classification of a particular material, *i.e.*, whether it is “hazardous material,” and/or whether it is covered by this HMERP, contact the Response Management Communication Center (RMCC) at 888-877-7267, 1-888-UPRR COP, or company line 8-544-RMCC.

DISTRIBUTION

This HMERP is distributed throughout the Union Pacific Railroad network through the company’s intranet web site where it is available for printing and posting. The HMERP is also supplemented with a site-specific emergency response information addendum at eighty-three facilities listed in *Section VI, Attachment B* of this HMERP (*List of Union Pacific Railroad Facilities With Supplemental Site-Specific Emergency Response Information*). For those facilities, a template for the site-specific emergency response information addendum is attached (*Section VI, Attachment C*). The template is completed by the Hazardous Materials Manager for each facility and attached to the HMERP. A copy of the entire HMERP is posted in an area where it is readily accessible to all employees, and in digital form, on the facilities’ internal websites, if one is available.

This HMERP may be made available for inspection and copying by employees, their representatives, and OSHA personnel. Copies may also be forwarded to local emergency planning commissions and other legally authorized emergency response entities.

ORGANIZATION

This HMERP is divided into six (6) sections:

- Section I - Scope of the HMERP
- Section II - Initial Observers and Other Employees – Roles, Responsibilities & Training
- Section III - Managers – Roles, Responsibilities & Training
- Section IV - Emergency Response Personnel – Roles, Responsibilities & Training
- Section V - Miscellaneous
- Section VI - Attachments:
 - HMERP Training Guide
 - List of Union Pacific Railroad Facilities With Site-Specific Emergency Response Information Addendum
 - Site-Specific Emergency Response Information Addendum Template

TABLE OF CONTENTS

| | | |
|--------------------|--|----|
| Section I | Scope of the HMERP..... | 4 |
| Section II | Initial Observers and Other Employees – Roles, Responsibilities & Training..... | 5 |
| | A. Scope | |
| | B. Expectations | |
| | C. Training – First Responder “Awareness” for Employees | |
| Section III | Managers in the Affected Area – Roles, Responsibilities & Training | 7 |
| | A. Scope | |
| | B. Expectations | |
| | C. Training – First Responder “Awareness” for Managers | |
| Section IV | Emergency Response Personnel – Roles, Responsibilities & Training | 10 |
| | A. Scope | 10 |
| | 1. Defensive Operations | |
| | 2. Offensive Operations | |
| | 3. HAZMAT Incident Commander | |
| | B. Expectations | 11 |
| | 1. Protocol for Defensive Operations | |
| | 2. Protocol for Offensive Operations | |
| | 3. Protocol for HAZMAT Incident Commander | |
| | C. Training – First Responder “Operations.” | 13 |
| | 1. Defensive Operations Training | |
| | 2. Offensive Operations Training | |
| | 3. HAZMAT Incident Commander Training | |
| | D. Other Personnel in the Railroad Incident Command Structure | 16 |
| Section V | Miscellaneous | 17 |
| | A. Pre-Emergency Planning | |
| | B. Coordination with Non-Railroad Emergency Response Personnel | |
| | C. Communications | |
| | D. Emergency Recognition and Prevention | |
| | E. Safe Distances/Places of Refuge/Evacuation Routes/Procedures | |
| | F. Site Security and Control | |
| | G. Decontamination Procedures | |
| | H. Emergency Medical Treatment and First Aid | |
| | I. Incident Critique and Follow-up Actions | |
| | J. Personal Protective Equipment | |
| Section VI | Attachments..... | 20 |
| | A. HMERP Training Guide | 21 |
| | B. Union Pacific Railroad Facilities With Site-Specific Emergency Response Information Addendum | 25 |
| | C. Site-Specific Emergency Response Information Template | 27 |

SECTION I

SCOPE OF THE HMERP

This Hazardous Materials Emergency Response Plan (HMERP) describes the emergency response procedures that will apply to a “non-incidental” release or threatened release of hazardous materials from a locomotive, railcar, vessel, or facility under the jurisdiction, custody or control of the Union Pacific Railroad Company. It applies to a non-incidental release that occurs anywhere within Union Pacific Railroad’s system, including off-site track and other right-of-way.

A response to an “incidental” release of hazardous materials which can be absorbed, neutralized, or otherwise controlled at the time of the release by employees in the immediate release area, or by maintenance personnel, is not considered an emergency response within the scope of this HMERP (or the OSHA standard requiring the development of this HMERP). A response to a release of hazardous materials where there is no potential safety or health hazard (such as fire, explosion or chemical exposure) is not considered an emergency response under OSHA’s definition of emergency response, and may be handled in a manner most suitable to the circumstances, taking into account the health and safety of on-the-scene personnel and other relevant legal requirements, but without initiating the Railroad’s incident command structure.

An incidental release of a hazardous material, where there is no significant safety risk or health hazard to the employee cleaning it up, or to employees in the immediate vicinity, and which has no potential to become an emergency in a short time frame, may be cleaned up by employees who are familiar with the hazards. No emergency response is required if the employees are knowledgeable, capable, and properly equipped to contain and mitigate the hazard, and there is no significant threat to human health, safety or the environment.

See 29 C.F.R. 1910.120(a)(3) – Definitions: “Emergency Response;” and Appendix E: “Releases of Hazardous Substances that Require an Emergency Response.”

SECTION II

INITIAL OBSERVERS AND OTHER EMPLOYEES ROLES, RESPONSIBILITIES & TRAINING

A. SCOPE

The provisions of this Section apply to “Initial Observers” and other employees in an affected area. Initial observers and other employees are individuals who are trained to initiate the emergency response sequence by notifying the proper authorities, and can assist in certain defensive response activities outside the zone of danger, but they do not assist in offensive emergency response operations. In the event of a hazardous materials incident, personnel that fall within this group are expected to “Protect, Alert, Notify, and Follow Instructions.”

B. EXPECTATIONS

When a release of hazardous materials is observed or discovered, the following actions should be taken by the Initial Observer and other employees in the affected area:

1. *Protect yourself and Alert Others*

- Move upwind and uphill a safe distance away from the release.
- Avoid contact with material and vapors.
- Warn bystanders to stay away.
- Eliminate ignition sources (do not smoke or use fuses).
- Alert others in the affected area.
- Use yard specific alarm systems if available; follow emergency radio procedures if necessary and appropriate.

2. *Initiate the Notification Process*

- Contact 911 if there is imminent risk of death, injury or damage to persons, property or the environment, or if there are other circumstances requiring immediate assistance.
- Contact the RMCC at 888-877-7267 (888-UPRR COP) and provide the requested information. The RMCC will notify federal, state and local emergency response authorities. Do not wait to make this notification. Provide whatever information is available at the time. Other information can be provided as it becomes available.
- Notify the local railroad command center, yardmaster, dispatcher, facility manager or local manager, as appropriate. If a telephone is not available, follow emergency radio procedures, as identified in the General Code of Operating Rules (GCOR), *i.e.*, Rule 2.10.

3. *Follow Instructions.*

- Turn to a designated radio channel or contact your supervisor directly for instructions.
- If ordered to evacuate, proceed to do so in a safe manner, as directed.
- If ordered to take refuge, proceed in a safe manner to the designated place of refuge.
 - For maximum protection at place of refuge, turn off all air handling equipment and close all windows and doors.
 - When safe to do so (supervisor will advise), open windows and doors and exit the building.

4. *Provide Limited Assistance*

- Stay within the limits of training and authorization.

- Assist as required in implementing defensive measures (e.g., use sandbags to erect a containment structure to protect a nearby waterway), but stay outside the zone of danger.
- Do not assist in offensive emergency response operations.

C. TRAINING

Since Union Pacific is a transporter of hazardous materials, the Company trains all employees to the “first responder awareness level.” First responders at the awareness level are individuals who are expected to initiate the emergency response sequence by notifying the proper authorities.

The preferred training mechanism for this group of employees is the “*Hazardous Materials Emergency Response Plan Training Guide*.” The *Training Guide* identifies various classes of hazardous materials, recognition techniques, documentation requirements, and initial observer actions delineated in the HMERP. Employees who regularly work at one of eighty-three (83) facilities identified in the list of facilities delineated by *Section VI, Attachment B* are further directed to review a supplemental site-specific emergency response information addendum for that facility. The site-specific information addendum establishes awareness of local warning systems, evacuation routes, areas of refuge, the location of windsocks, flags, showers and eyewash stations, and the telephone numbers of local emergency response agencies, *i.e.*, fire department, police department, and emergency medical personnel.

The *Training Guide* is delivered electronically or by regular mail to all Union Pacific employees on an annual basis. The site-specific information addendum is posted in common areas at each facility. It can also be acquired from facility managers, and/or downloaded and printed from the company’s intranet web site.

Delivery of the *Training Guide* is documented for each employee in the Union Pacific Plateau system. HZ89 is the training code to record distribution of the *Training Guide*. A copy of the *Training Guide* and a template for the site-specific information addendum are attached to Section VI of this HMERP (*Attachments A and C*).

SECTION III

MANAGERS IN THE AFFECTED AREA ROLES, RESPONSIBILITIES & TRAINING

A. SCOPE

This Section applies to managers in the affected area who observe or discover a release or have news of a release reported to them by a subordinate. Managers are trained to initiate the emergency response sequence by notifying the proper authorities, and can assist in certain defensive response activities outside the zone of danger, but cannot participate in offensive emergency response operations. In addition to the expectations that apply to the Initial Observer and other employees (*i.e.*, protect, alert, notify and follow instructions) they are expected to account for the safety of their employees and contractor personnel, arrange for first-aid if required by subordinates, coordinate facility-based evacuations, and assist in defensive response activities outside the zone of danger.

B. EXPECTATIONS

When a release of hazardous materials is observed, discovered or reported by a subordinate, Managers in the affected area should initiate the following actions:

1. *Protect Yourself and Alert Others*

- Adhere to the provisions of Section II of this HMERP to protect yourself.
- Accurately record information provided by an Initial Observer.
- Contact 911 if there is imminent risk of death, injury or damage to persons, property or the environment, or if there are other circumstances requiring immediate assistance.
- Alert all employees and other persons in the affected area:
 - Sound the designated warning signal for a general emergency.
 - Implement GCOR Rule 2.10 and broadcast the following message:

This is a hazardous materials emergency broadcast.

There is a hazardous materials emergency at indicate location.

Do not enter this area. Anyone in this immediate area should move away from the incident. Go upwind to safety. Contact your supervisor."

2. *Initiate the Notification Process*

- Contact the RMCC at 888-877-7267 (888-UPRR COP) and provide the requested information. Table 1 (see below) references relevant RMCC information protocol. The RMCC will notify federal, state and local emergency response authorities. Do not wait to make this notification. Provide whatever information is available at the time. Other information can be provided as it becomes available.
- Notify the local railroad command center, yardmaster, dispatcher, facility manager or local manager, as appropriate. If a telephone is not available, follow emergency radio procedures, as identified in the GCOR, Rule 2.10.
- Notify arriving and departing train crews; provide instruction on appropriate safety precautions and/or evacuation, if necessary.

3. *Provide Limited Assistance*

- Provide emergency response officials with a copy of the train list or shipping papers. For a transportation incident, obtain shipping description entries and other pertinent emergency

response information from the TCS system. Logon to TCS10 and enter *TTH car initials and number* (all together) or for train information, enter *BC Train identification date D*.
Example: *TTHGATX1234 or BC MPCRO 30 D*.

- Guide emergency response personnel to the location of the incident, if safe to do so. Identify access routes, staging areas, and other pertinent information.

4. Account for All Employees and Other Personnel

- Account for all direct-report employees and contractor personnel in the affected area.
- Report immediately to the ranking on-scene emergency response official or the RMCC if any employee or contractor personnel are not accounted for.

5. Coordinate Evacuation of Employees & Other Facility Personnel

- If evacuation is necessary, note wind direction and use available broadcast resources (e.g., radio, telephone, or facility sound system) to instruct all non-emergency response personnel to evacuate the area or proceed to an appropriate place of refuge, located upwind and outside the danger zone.
- If necessary, consult the site-specific information addendum to this HMERP for the location of windsocks and/or flags, safety showers, evacuation routes, and places of refuge.
- Direct all subordinate management officials, *i.e.*, supervisors and/or foremen, to account for all direct-report employees and contractor personnel.
- Report to the ranking on-scene emergency response official or the RMCC if any employee or contractor personnel cannot be accounted for at the designated place of refuge.

6. Arrange for First-Aid to be Provided to Injured Personnel

- If personnel have been injured, arrange for first-aid or on-site medical evaluation and treatment.
- If first aid and/or medical services are not available on site, transport injured personnel to a nearby first-aid or medical treatment facility, if safe to do so.
- If available, provide relevant hazardous material information (e.g., MSDS) to first aid/medical personnel engaged in evaluation and/or treatment.
- If injured personnel are transported off-site, record the name, address and telephone number of the receiving medical treatment facility.

7. Stay within Authorized Limits of Training and Scope of Duties

- Assist as required in implementing defensive emergency response measures (e.g., erect a containment structure using sandbags to protect a nearby waterway), but stay outside the zone of danger.
- Direct non-emergency response activities from a safe location until relieved by a more senior Railroad official.
- Stay within the limits of training and authorization. Do not assist in offensive emergency response operations.

TABLE 1
RMCC Information Protocol

Contact the RMCC to initiate the notification process. The information in the table below will be helpful to the RMCC. Provide as much information as possible, but do not delay notification. Provide what information is available at the time, and supplement it as more information becomes available.

| | |
|--|---|
| Information about yourself (the observer/caller). | Name Location (place where you will meet responders) Means of contact (telephone number, radio frequency, etc.) |
| Type of emergency. | |
| Location of emergency. | Mile post County/parish City Subdivision Name of facility/yard or track Street address, etc. Special instructions for emergency responders, if needed |
| Status of employees and others in area. | Deaths, injuries, and numbers and names, if known. |
| Date and time emergency occurred. | |
| Equipment involved (rail, other). | Car initial and number Unit number Name and quantity of hazardous material Hazard class |
| Description of surroundings. | Proximity to populated buildings, other important or occupied buildings, important roads, bridges, drainage ditches, streams, waterways, bodies of water, and drains. |
| Resources Required to Manage. | Fire Ambulance Law enforcement |
| Resources Currently Available. | |
| Initial actions taken. | Emergency response agencies on the scene. UPRR personnel responding Defensive Operations initiated (e.g., evacuation, control of released materials, etc.). |
| Initial notifications made. | Identify any prior notifications (i.e. RMCC, 911, etc.). |
| Weather conditions. | |
| Effect on train operations. | |

C. TRAINING

In addition to HZ89 training, managers also complete an online course of instruction referred to as HZ90. The HZ90 training module is a more comprehensive version of the HZ89, and includes an online examination. The objective of the HZ90 is to provide managers with a more comprehensive understanding of the HMERP. Once completed, documentation of training is automatically recorded in Plateau. HZ90 refresher training is performed annually. Note that HZ90 does not qualify managers to initiate or direct a defensive or offensive emergency response operation. Managers are authorized to coordinate evacuations of facility personnel, and may assist in the implementation of defensive emergency response operations, but only outside the zone of danger, and only under the direction of properly trained emergency response personnel.

SECTION IV

EMERGENCY RESPONSE PERSONNEL ROLES, RESPONSIBILITIES & TRAINING

A. SCOPE

The provisions of this Section apply to individuals who are trained and authorized to engage in both “defensive” and “offensive” emergency response operations.

1. *Defensive Operations:*

“Defensive” emergency response operations, as defined by OSHA regulations, are distinct from “offensive” emergency response operations. The individuals who perform defensive operations do not attempt to approach the point of a release. They may take action to contain a release from a safe distance, and try to prevent exposures, but do not try to stop a release. Their objective is to prevent further injury or damage to nearby persons, property and/or the environment. The individuals who perform this function for Union Pacific are Environmental Management Group (EMG) personnel, special agents/hazardous materials, and other properly-trained personnel who are first to arrive at the scene.

2. *Offensive Operations:*

Individuals who are trained to engage in “offensive” emergency response operations are referred to by OSHA regulations as *Hazardous Materials Technicians* and *Hazardous Materials Specialists*. The *Technician* is trained, equipped and authorized to approach the point of a release in order to plug, patch or otherwise stop the release. The *Specialist* responds with and provides support to the Technician. The duties of the Specialist parallel those of the Technician, but require a more comprehensive understanding of the hazardous materials they may be called upon to address. Within Union Pacific, most EMG personnel are trained to the hazardous materials technician level. A select group of individuals, including hazardous materials managers, special agents/hazardous materials and certain other EMG personnel, are trained to the hazardous materials specialist level.

3. *HAZMAT Incident Commander:*

The highest ranking properly trained official designated by the Railroad to take charge of the Railroad’s emergency response operations is the *HAZMAT Incident Commander*. The role of the HAZMAT Incident Commander is limited to managing the personnel, equipment and resources associated with emergency response operations. Other functions incident to Railroad operations are typically outside the scope of his or her authority.

If the functions of the HAZMAT Incident Commander are assumed by an Incident Commander designated by federal, state or local authorities (e.g., local fire or police chief, EPA on-scene coordinator, FEMA coordinator, etc.), the HAZMAT Incident Commander must relinquish authority over emergency response operations to the Government’s Incident Commander and cooperate as necessary to complete emergency response operations. Under such circumstances, the HAZMAT Incident Commander may continue to perform liaison functions to the Government’s Incident Commander, or be asked to stand down by Union Pacific management to allow another senior Railroad official, *i.e.*, the *Railroad Operations Commander*, to perform the liaison function.

B. EXPECTATIONS

1. Protocol for Defensive Operations:

When a release of hazardous materials is reported, the following actions may be taken by individuals authorized to initiate and/or direct “defensive” emergency response operations:

- Take action to protect yourself and others.
- Confirm that notification protocols have been initiated.
- Identify the hazardous material(s) involved in the incident.
- Identify potential human and ecological receptors.
- Contact 911 if immediate assistance is required to abate an imminent risk to human health or the environment.
- Identify available resources that can be used for basic control, containment and/or confinement operations.
- Mobilize available resources and utilize personal protective equipment.
- Initiate basic control, containment and/or confinement operations if safe to do so, consistent with available resources and personal protective equipment.
- Communicate conditions on the ground to the HAZMAT Incident Commander, facility manager(s) and/or federal, state and local authorities.
- Do not approach the point of release or otherwise attempt to plug, patch or stop the release.

2. Protocol for Offensive Operations:

The following protocol should be adhered to by individuals who engage in “offensive” emergency response operations:

- Operate within the Railroad Incident Command structure (identified below).
- Identify the hazardous material(s) involved in the incident.
- Utilize personal protective equipment that are appropriate to the incident.
- Utilize field survey instruments and other equipment, as required.
- Locate the point of release and identify damage to containment structures and/or associated device(s).
- Identify equipment and other resources needed to perform repairs and/or stop the release.
- Communicate site conditions to the HAZMAT Incident Commander, facility manager(s) and/or federal, state and local authorities.
- Inform the HAZMAT Incident Commander immediately if assistance is required to abate an imminent risk to human health or the environment.
- Repair existing containment structures and/or associated devices and perform other functions as required to abate a release or threatened release.

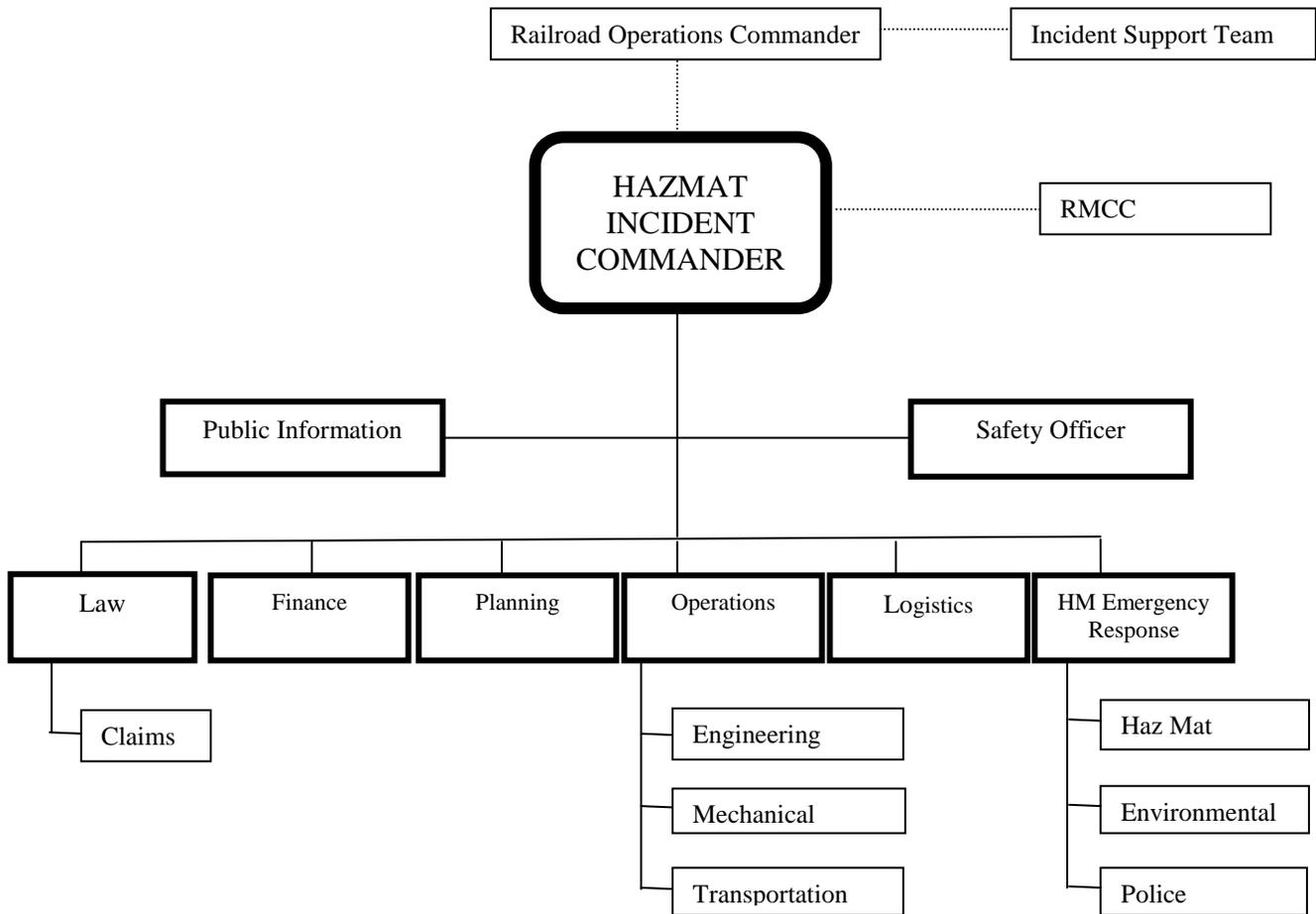
3. Functions of the HAZMAT Incident Commander:

The HAZMAT Incident Commander is responsible for initiating the Railroad’s Incident Command Structure (depicted below) and for implementing the HMERP. In doing so, the HAZMAT Incident Commander performs the following functions:

- Identify the hazardous materials present at the location of a hazardous materials incident and the conditions that pose a risk to emergency response personnel, and based on this assessment, plan and implement an emergency response operation to contain and stop the release, repair existing containment structures and/or associated devices, and address continuing risks to human health, property and/or the environment.
- Ensure that emergency response personnel utilize appropriate personal protective equipment.

- Designate a safety official who is familiar with the operations to be implemented at the emergency response site. This individual will be responsible for identifying hazards, evaluating risks, and making recommendations to enhance safety. This individual will also have the authority to alter, terminate or suspend emergency response operations if he or she suspects conditions exist that pose imminent danger.
- Ensure that offensive emergency response activities are performed in groups of two or more.
- Ensure that backup personnel are available with equipment ready to provide assistance or rescue.
- Ensure that advanced first-aid personnel are available with medical equipment and transportation capability.
- Ensure that non-employee support personnel are properly briefed and equipped with appropriate personal protective equipment before performing emergency support work.
- Ensure that appropriate decontamination procedures have been implemented after emergency response operations are terminated.

RAILROAD INCIDENT COMMAND STRUCTURE



C. TRAINING

1. Defensive Operations:

Employees authorized to engage in defensive emergency response operations must be trained to the “First Responder Operations Level,” as defined by OSHA. First responders at the operations level must receive at least eight (8) hours of training or have sufficient experience to demonstrate competency in the following areas (in addition to those listed for the First Responder Awareness Level):

1. Knowledge of basic hazard and risk assessment techniques.
2. Ability to properly select and use personal protective equipment.
3. An understanding of basic hazardous materials terms.
4. Ability to initiate basic control, containment and/or confinement operations.
5. Ability to initiate basic decontamination procedures.
6. Understanding of standard operating and termination procedures.

Within Union Pacific, the individuals who perform this function receive forty (40) hours of comprehensive HAZWOPER training.

2. *Offensive Operations:*

Employees authorized to engage in “offensive” emergency response operations must be trained to the “Hazardous Materials Technician” or “Hazardous Materials Specialist” level. This involves a minimum of twenty-four (24) hours of training and a demonstration of various core competencies.

The Technician must demonstrate competency in the following areas:

1. Utilize field survey instruments and other equipment to ascertain the classification, identification and verification of known and unknown hazardous materials.
2. Be able to implement the HMERP.
3. Be able to function effectively within the Railroad Incident Command Structure.
4. Be able to properly select and utilize appropriate personal protective equipment.
5. Understand hazard and risk assessment techniques.
6. Be able to perform advanced control, containment and/or confinement operations.
7. Understand and implement decontamination procedures.
8. Understand termination procedures.
9. Understand basic chemical and toxicological terminology and behavior.

The Specialist must demonstrate a more comprehensive understanding of the Technician’s core competency areas, and in addition, demonstrate the following:

1. Know how to implement the emergency response plan of the local jurisdiction.
2. Know of the State’s emergency response plan.
3. Be able to develop a site safety and control plan.

Within Union Pacific, individuals who perform the duties of a hazardous material technician receive forty (40) hours of comprehensive HAZWOPER training. Individuals who perform the duties of a hazardous materials specialist receive eighty (80) hours of relevant training, consisting of the forty (40) hour HAZWOPER program and a forty (40) hour TANK CAR SAFETY program unique to Railroad operations.

3. *HAZMAT Incident Commander Training:*

Employees who will assume the role of HAZMAT Incident Commander must have at least twenty-four (24) hours of training, and in addition, demonstrate competency in the following core areas:

1. Know how to implement the HMERP.

2. Know and be able to implement the Railroad's incident command structure.
3. Understand the hazards and risks that employees face when working in chemical protective clothing.
4. Know how to implement the emergency response plan of the local jurisdiction.
5. Know of the State emergency response plan and the Federal Regional Response Team.
6. Know and understand the importance of decontamination procedures.

Within Union Pacific, qualified individuals receive a minimum of forty (40) hours of HAZWOPER training or greater.

4. *Other Personnel within the Railroad Incident Command Structure:*

The roles of other individuals in the Railroad Incident Command Structure are outlined in Section D (see below). Training of other personnel within the Railroad Incident Command Structure will be based upon the duties and functions to be performed by each employee.

5. *Refresher Training:*

All employees will receive annual refresher training of sufficient content and duration to maintain their competencies.

6. *Records Management:*

Documentation of initial and annual refresher training shall be noted and maintained in the Union Pacific Plateau system.

Table 2
Summary of Railroad Emergency Response Training

| Role of Employee Group | Employee Group | Regulatory Training Requirement | UPPR Training Protocol & Documentation |
|---|---|--|---|
| Protect, Alert, Notify & Follow Instructions | All Union Pacific employees. | First Responder Awareness plus annual refresher training. | HZ89 for all employees; documented in Plateau. |
| Account for Subordinates, Assist and Coordinate as Directed | Field managers. | First Responder Awareness plus annual refresher training. | HZ90; documented in Plateau. |
| Defensive Operations | Select EMG personnel; special agents/hazardous materials; and other properly-trained personnel. | Minimum 8 hours or experience sufficient to demonstrate core competencies plus annual refresher training. | 40 Hour HAZWOPER (HZ94) plus annual refresher (HZ95); documented in Plateau. |
| Offensive Operations/ Hazardous Materials Technician | Select EMG personnel; special agents/hazardous materials. | 24 hours and experience sufficient to demonstrate core competencies plus annual refresher training. | 40 Hour HAZWOPER (HZ94) plus annual refresher (HZ95); documented in Plateau. |
| Offensive Operations/ Hazardous Materials Specialist | Select EMG personnel and special agents/hazardous materials. | 24 hours and experience sufficient to demonstrate core competencies plus annual refresher training. | 40 Hour HAZWOPER (HZ94) plus annual refresher (HZ95) & 40 Hour Tank Car Safety (HM06); documented in Plateau. |
| HAZMAT Incident Commander | Highest ranking properly-trained EMG official or special agent/hazardous materials. | 24 hours and experience sufficient to demonstrate core competencies plus annual refresher training. | 40 Hour HAZWOPER (HZ94) plus annual refresher (HZ95) & NIMS (HZ97A, B & C); documented in Plateau. |
| Railroad Operations Commander | Senior Railroad official with or without hazardous materials training. | Not addressed by regulation. | None |

D. OTHER PERSONNEL IN THE RAILROAD INCIDENT COMMAND STRUCTURE

The roles of various Railroad personnel within the framework of the Railroad Incident Command Structure are described below. All individuals must comply with the direction of the Railroad Incident Commander when engaged in activities designed to support emergency response operations. The roles assigned to particular personnel, if any, will depend upon the nature of the emergency.

| <i>Group/Position</i> | <i>Role</i> |
|--|--|
| Response Management Communications Center (RMCC) | Initiates notification of relevant federal, state and local emergency response authorities and Railroad personnel. Provides updates as needed. |
| Dispatching Centers HDC (Harriman), SDC (Southern), WDC (Western) | Conducts internal notifications to other departments, as necessary. |
| Law Department | Provides legal support and other resources to Railroad emergency response personnel. |
| HAZMAT Incident Commander | Implements the HMERP. Performs associated command functions. Coordinates with Incident Commander appointed by Government entity, if one is designated. |
| Public Information Officer | Disseminates emergency-related information to third parties. |
| Assigned or Designated Safety Officer | Identifies and evaluates hazards and provides appropriate direction with respect to all matters relating to operational safety, including health and safety of employees and contractors. Arranges for advanced first aid personnel and transportation when local resources are not available. Safety Officer has the authority to alter, suspend, or terminate operations if there is imminent risk of danger to health and safety. |
| Finance | Maintains information on cost issues. |
| Claims | Directs efforts to minimize impact on the community; manages and investigates all claims. |
| Engineering | Rebuilds damaged track, subgrade, bridges and culverts, signals, and other railroad structures associated with the emergency. |
| Mechanical | Rerails, repairs, or disposes of damaged rail equipment and non-hazardous lading associated with the emergency. |
| Transportation | Maintains local railroad operations that are not impacted by and/or do not impact emergency response operations. |
| Hazardous Materials | Responds to a hazardous material release incident with properly trained personnel. |
| Environmental | Directs efforts to address environmental aspects that may be associated with hazardous material release. Supports hazardous materials emergency response efforts. |
| Police | Manages site security in conjunction with local, state, and federal law enforcement agencies. |
| Damage Prevention (Freight Claims) | Transfers, salvages, or disposes of non-hazardous commodities associated with the emergency. |
| Derailment Prevention | Directs efforts for investigation of cause of the emergency. |
| Tele-communications | Provides and maintains required communications. |

Section V

MISCELLANEOUS

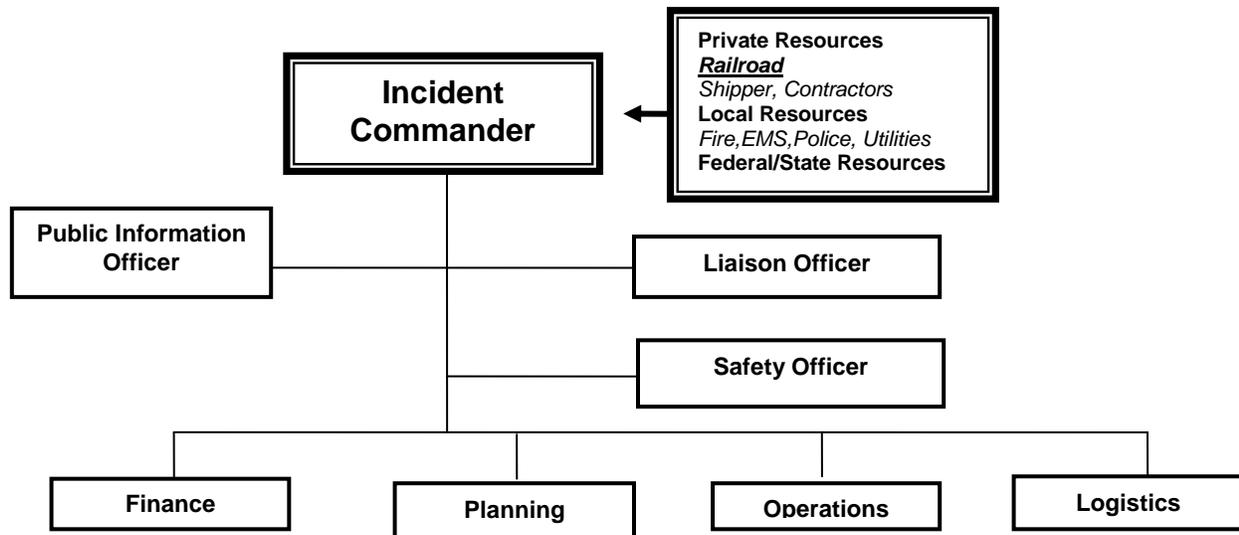
A. PRE-EMERGENCY PLANNING

The Railroad provides emergency response training specific to Railroad operations to local first responders throughout the Railroad's geographic area of operations. Hazardous materials information is provided to local emergency response authorities pursuant to the Emergency Planning and Community Right-to-Know Act (EPCRA). In addition, the Railroad cooperates and actively participates with local communities through various outreach initiatives, i.e., LEPC meetings, Responsible Care Initiatives, and TransCAER events, to enhance coordinated emergency response activities. The HMERP is provided to local fire departments upon request.

B. COORDINATION WITH NON-RAILROAD EMERGENCY RESPONSE PERSONNEL

- If the functions of the HAZMAT Incident Commander are assumed by an Incident Commander designated by federal, state or local authorities (e.g., local fire or police chief, EPA on-scene coordinator, FEMA coordinator, etc.), the HAZMAT Incident Commander shall relinquish authority over emergency response operations to the Government's Incident Commander and cooperate as necessary to complete emergency response activities.
- The HAZMAT Incident Commander may continue to perform liaison functions consistent with the National Incident Management Structure (NIMS) identified below, or may be asked to stand down to allow other Railroad officials to perform this function, i.e., the Railroad Operations Commander.

NATIONAL INCIDENT MANAGEMENT STRUCTURE (NIMS)



C. COMMUNICATIONS

- Notifications to federal, state and local authorities will be initiated by the Response Management Communications Center (RMCC).
- The HAZMAT Incident Commander will establish internal communication protocol and advise emergency response personnel regarding radio frequencies, telephones and other means of communication that will be made available during emergency response operations.

D. EMERGENCY RECOGNITION AND PREVENTION

- All Union Pacific employees receive annual training at the first responder awareness level through the *HMERP Training Guide*. The *Training Guide* identifies classes of hazardous materials, recognition techniques, documentation requirements, and initial observer actions delineated in the HMERP. Individuals engaged in offensive and defensive emergency operations receive more comprehensive training.
- Railroad personnel perform hazardous materials inspections at various stages of the transportation cycle.

E. SAFE DISTANCES/PLACES OF REFUGE AND EVACUATION ROUTES/PROCEDURES

- A site-specific emergency response information addendum has been developed for eighty-three facilities listed in Section VI, Attachment B. This document is posted in common areas at each facility, and may be obtained from the facility manager, and/or downloaded from the company's intranet web site.

F. SITE SECURITY AND CONTROL

- Railroad police are authorized to address general security issues on Railroad property, including those that may arise during emergency response operations. If local law enforcement officials become involved in an incident response, Railroad police coordinate with local law enforcement officials to manage site security and control.

G. DECONTAMINATION PROCEDURES

- The HAZMAT Incident Commander shall determine and instruct emergency response personnel on appropriate decontamination methods relevant to a particular chemical hazard.

H. EMERGENCY MEDICAL TREATMENT AND FIRST AID

- Managers at the first responder awareness level arrange for first-aid and/or medical treatment of injured non-emergency response personnel.
- The HAZMAT Incident Commander arranges for advanced first aid/medical treatment of injured emergency response personnel.
- The HAZMAT Incident Commander will communicate information pertaining to chemical materials and other hazards to first-aid/medical personnel as necessary to facilitate appropriate treatment of injuries.

I. INCIDENT CRITIQUE AND FOLLOWUP ACTIONS

- An incident analysis shall be performed and documented for non-incident emergency response actions which involve mobilization of a HAZMAT Incident Commander.
- The HAZMAT Incident Commander shall ensure that copies of the incident analysis are retained for future reference and/or inspection.
- Follow-up actions, including appropriate amendments to governing documents, shall be implemented as required to address deficiencies in the implementation of emergency response operations or other provisions of the HMERP.

J. PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Determination of appropriate PPE levels will be based on an evaluation of the characteristics of the PPE relative to the requirements of the site, the task, and the hazards identified.

SECTION VI
ATTACHMENTS

- A. HMERP Training Guide
- B. List of Union Pacific Railroad Facilities With A Site-Specific HMERP Addendum
- C. Site-Specific HMERP Addendum Template

Attachment A

HZ-89

Hazardous Materials Emergency Response Plan Training Guide

RESERVED

RESERVED

RESERVED

Attachment B

**UNION PACIFIC RAILROAD FACILITIES WITH A
SITE-SPECIFIC EMERGENCY RESPONSE INFORMATION ADDENDUM**

| STATE | LOCATION |
|--------------|--|
| AR | Little Rock |
| AR | Pine Bluffs |
| AZ | Nogales |
| AZ | Phoenix |
| AZ | Tucson |
| AZ | Yuma |
| CA | Bakersfield |
| CA | City of Industry |
| CA | Commerce-Los Angeles |
| CA | Dolores |
| CA | Fresno |
| CA | LATC-Los Angeles |
| CA | ICTF Yd-Long Beach |
| CA | Martinez |
| CA | Oakland |
| CA | Roseville (potential OPA 2005) |
| CA | Stockton |
| CA | West Colton |
| CA | Yermo |
| CO | 36th Street-Intermodal-Denver |
| CO | Burnham-Denver |
| CO | North Yard-Denver |
| CO | Grand Junction |
| IA | Cedar Rapids |
| IA | Clinton |
| IA | Council Bluffs |
| IA | Des Moines |
| ID | Nampa |
| ID | Pocatello |
| IL | Canal Street-Intermodal |
| IL | Dupo |
| IL | East St. Louis(A&S) |
| IL | Global I |
| IL | Global III |
| IL | Melrose Park-Proviso-Global II |
| IL | Yard Center-Dolton |
| KS | Coffeyville |
| KS | Kansas City (Armourdale, 18th, Armstrong, Fairfax) |
| KS | Topeka |
| KS | Wichita |
| LA | Alexandria |

(continued)

| STATE | LOCATION |
|--------------|-----------------|
| LA | Avondale |
| LA | Lake Charles |

UNION PACIFIC HAZARDOUS MATERIAL EMERGENCY RESPONSE PLAN

| | |
|----|------------------------|
| LA | Livonia |
| LA | Hollywood-Shreveport |
| MN | St. Paul |
| MO | Neff-Kansas City |
| MO | Lesperance-St. Louis |
| NE | Fremont |
| NE | Grand Island |
| NE | North Platte |
| NE | South Morrill |
| NV | Elko |
| NV | Sparks |
| OR | Albina |
| OR | Barnes |
| OR | Eugene |
| OR | Hermiston-Hinkle |
| OR | Brooklyn-Portland |
| TN | Memphis |
| TX | Angleton |
| TX | Beaumont |
| TX | Bloomington-Victoria |
| TX | Dallas Street-El Paso |
| TX | Alfalfa-El Paso |
| TX | Davidson (Ft. Worth) |
| TX | Hearne |
| TX | LaPorte-Strang-Houston |
| TX | Englewood-Houston |
| TX | Settegast-Houston |
| TX | Longview |
| TX | Ney |
| TX | Kirby-San Antonio |
| TX | East Yard-San Antonio |
| TX | SoSan Yard-San Antonio |
| UT | Ogden |
| UT | Roper |
| UT | Salt Lake |
| WA | Argo-Seattle |
| WI | Butler-Milwaukee |
| WY | Cheyenne |
| WY | Green River |
| WY | Rawlins |

Attachment C

**SITE-SPECIFIC EMERGENCY RESPONSE
INFORMATION ADDENDUM**

Hazardous Materials Managers shall complete this HMERP addendum for each of the facilities identified in Section VI, Attachment B. The entire HMERP, including this addendum, must be posted in an area of the facility which is easily accessible to employees. It should also be made available on the company's local intranet website.

Local Emergency Contact Numbers:

Fire Department

Police Department

First-Aid/Emergency Medical Services

Response Management Communications Center

Emergency Evacuation Route(s) (attach map): _____

Places of Refuge & Special Instructions: _____

Location of Emergency Alarm System /Sirens: _____

Emergency Radio Channel(s): _____

Location of Emergency Showers/Eyewash: _____

Location of Available Wind socks and/or Flags: _____

Access Points: _____

Staging Areas: _____

Command Post Location: _____

List Equipment that may be used to Facilitate Emergency Response: _____

UNION PACIFIC HAZARDOUS MATERIAL EMERGENCY RESPONSE PLAN

Location of Equipment that may be used to Facilitate Emergency Response: _____

Other Relevant Information: _____
