

CPLAN Renewal Change Log

Current CPLAN Section	Revised CPLAN Section	Change Log Comments
All	All	Changed font
All	All	Updated revision number and date (this will be updated again upon approval to reflect the month and year this plan was approved)
All	All	Removed full regulatory citations and replaced with more streamlined regulatory cross references
Tables	Tables	The format of all tables was updated to allow for more efficient updates to the plan
Approval Letters	6.4	Relocated to the end of the plan to facilitate more efficient updates to the plan
Cover	Cover	No Changes
--	Certificate of Approval	Included a specific page on which to include the certificate of approval; originally included as part of Approval Letters
Cover Page	--	Relocated to appear in regulation order; relocated after Greatest Possible Discharge Section. Changed format and aligned content with regulatory requirements (removing name of plan holder and covered option information). Updated official plan title.
Front Matter	--	Removed unnecessary header.
Plan Contents	Plan Contents	Expanded language to more closely align with the regulatory requirements. Relocated plan organization information into its own section.
--	Greatest Possible Discharge	New section to identify Greatest Possible Discharge to address new regulatory requirement
Notification of Non-Readiness	--	Removed content as it is not required to be in the plan by regulation
Distribution List	--	Removed content as it is not required to be in the plan by regulation
Record of Revisions	6.3	Removed language about the various types of revisions as it is not required to be in the plan by regulation; relocated to the end of the plan to facilitate more efficient updates to the plan
Record of Review	--	Removed content as it is not required to be in the plan by regulation; this content is adequately covered by the content of Section 6.3

Current CPLAN Section	Revised CPLAN Section	Change Log Comments
Table of Contents	Table of Contents	Replaced three separate table of contents with a single one showing tables and figures in line
Cross Reference Table	Cross-Reference Table	Citations were updated to reflect regulatory citation changes. Based on this, the presentation was updated from one large table into several smaller tables. Additionally, non-CPLAN (article 4) requirement regulatory citations were relocated to within the text of the document and not in this section.
Definitions	--	Removed content as it is not required to be in the plan by regulation
Acronyms	6.1	No significant changes
1	1	Slight language changes that do not significantly affect content
1.1	1.1	Slight language changes that do not significantly affect content
1.2	1.2	Updated language for usability; reformatted tables for all Reporting and Notification information
1.3	1.3	Replaced specific language with a reference to the ICS-208 form which would be developed by a Safety Officer within the Incident Command System; this form outlines necessary steps for development of an incident specific safety plan
1.4	1.4	Updated language for usability; removed redundant references and table with communication information updated
1.5	1.5	Language updated for usability and alignment with regulatory requirements
1.6	1.6	<p>Response Scenario content moved to a separate document adopted by reference as allowed by new regulations; major changes to the response scenario include:</p> <ul style="list-style-type: none"> - Addition of a TOC and cross-reference table - Text language and formatting updates to improve usability - Addition of calculations and languages related to oil recovery - Addition of more detailed waste information - Updates to the scenario present that reduces errors and does not include duplicative information (i.e., removed ICS 215 and 209) and consolidated oil recovery and temporary storage tables onto a single page; incorporated alternative wind scenarios into existing ICS-204a forms vs. presenting separately

Current CPLAN Section	Revised CPLAN Section	Change Log Comments
		- Addition of detailed information as to how spill trajectories were developed
1.7	--	Removed as not applicable; noted as not applicable in cross reference table and thus not included here
1.8	1.7	Figures updated to align more closely with regulatory requirements; information about detailed piping diagram added to address new regulatory requirement
N/A	1.8	New section added covering general procedures for Greatest Possible Discharge to address new regulatory requirement
2	2	Expanded content to include cross-reference to provide reader increased usability
2.1	2.1	Updated format of information and provided cross-references; relocated some of the content from the original plan to Section 2 in the updated version
2.1.1	2.1.1	Updated content to more closely align with regulatory requirements, including consolidation of information into one table vs. multiple
--	2.1.2	New section added to provide a comprehensive list of inspections and maintenance conducted at the facility
2.1.2	2.1.3	Language slightly updated for usability
2.1.3	2.1.4	Updated format and means of presentation; restructured language to provide in a more concise manner
2.1.4	2.1.5	Cross-reference table added; reorganized and adjusted content to more closely align with regulatory requirements
--	2.1.6	Section introduction for facility description and operational overview added here; some of this was previously in the beginning of Section 3, but relocated here for better flow and increased usability. Added Tables 2-2 and 2-3 to more clearly present information previously cross-referenced
2.1.5	2.1.6, 2.1.6.1, 2.1.6.2	<p>Content reorganized and presentation updated to improve usability and more closely align with regulatory requirements. Some subsections from the prior version of the plan were consolidated in the updated version.</p> <p>For example, the FCAST sections from the prior plan addressing leak detection, high level alarms, and overfill protection were combined into a single “FCAST Discharge Prevention” section as these topics are inter-related.</p>

Current CPLAN Section	Revised CPLAN Section	Change Log Comments
2.1.6	2.1.6.3	Content reorganized and presentation updated to improve usability and more closely align with regulatory requirements. In some cases, refer to supporting documentation in Section 6.2 vs. repeating language (i.e., SCA volume calculations).
2.1.7	2.1.6.4	Content reorganized and presentation updated to improve usability and more closely align with regulatory requirements.
2.2	2.2	Table added and discharge meeting criteria for inclusion was added; previously there were no discharges meeting criteria for inclusion
2.3	2.3	Information presented in a single table vs. multiple in-line text tables to improve usability and put all content in one location vs over multiple pages
2.4	2.4	Updated presentation of information to table format
2.5	2.5	Updated language for usability
2.6	--	Removed as not applicable; noted as not applicable in cross reference table and thus not included here
3	3	Added language to describe not applicable conditions as appropriate
3.1	2.1.6	See above for comments as the information formerly in section was moved to reduce cross-referencing
3.2	3.1	Relevant information and sources presented through in-line tables; additional language was added, including calculations to determine RPS remaining on land, to improve transparency and provide additional details as to how values were derived. Presentation updated to more user friendly format.
3.3	3.2	Section reorganized and updated to avoid repeating common knowledge (i.e., ICS process) and focus more on DW's application and intended uses for the ICS system
3.4	3.3	Discussion language abbreviated and content moved to tabular format to help show all information on a single page in a more usable format
3.5	3.4	Updated to present information in a more usable format, which is more easily updated and maintained
3.6	3.5, 3.6, Response Scenario	Replaced existing sections with new language cross references the equipment list in the response scenario to avoid duplication and discrepancies within the plan
3.7	--	Removed as not applicable; noted as not applicable in cross reference table and thus not included here

Current CPLAN Section	Revised CPLAN Section	Change Log Comments
3.8	3.7	Language reformatted to in-line table presentation; removed reference to IMT service provider as this is not required by regulation
3.9	3.8, 2.1.1	Redirect to relevant section to reduce duplication of information
3.10	3.9, Response Scenario	Language updated for usability and flow; usefulness of section to provide readers with resources to identify Environmentally Sensitive Areas (ESAs) and probable points of contact. Tables updated with relevant information from discussion. Response scenario incorporates identifiable ESAs and GRS.
--	3.10	New section to identify list of resources for Greatest Possible Discharge to address new regulatory requirement
3.11	3.11	Updated to provide more streamlined references and reduce number of links where information is available from a single site
3.12	3.12	Updated based on references throughout plan
4	4	Reader instructions added for the analysis presented in table form; all BAT tables reviewed and updated to more closely align with the six step evaluation process and be more facility specific. Combined tables/sections where relevant to more closely align with regulatory requirements.
5	5	RPS updated to reflect largest tank shell capacity, not safe fill height; format updated for usability and transparency
Appendices	6	Updated cover page to list all documents included in the appendix; removed information not required by regulation. Organized the plan appendix in a manner that facilitates future updates. Improved plan usability through moving content from the front of the plan to the end to allow user to gain access to plan content quicker (i.e., removed 40+ pages of approval letters from the front and relocated to the back)