

Site Name David Howard Flowline Release
Facility ID 479610
Spill/Release ID 484274
Remediation # 40353

Document Date	Document #	Document Type	Condition of Approval (COA)	Corrective Action (CA)	Status	Date Due	Date Resolved	Resolved Doc #
4/15/2023	403374685	Form 19 Initial	In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.	Acknowledged.	Closed	NA	NA	NA
4/15/2023	403374685	Form 19 Initial	Initial reports indicate cleanup was halted due to weather. Operator shall ensure that stormwater does not transport impacts outside of the spill footprint.	Acknowledged.	Closed	NA	NA	NA
4/15/2023	403374685	Form 19 Initial	On the next Form 19 Supplemental Operator is to provide the root cause of the incident and preventative measures that will be taken to prevent reoccurrence on this and other flowlines at this location. Please give the location of the failure (i.e. 6 O'clock position) and if the root cause is corrosion explain if it is external or internal.	Root cause and preventative measures were included in the form 19 supplemental form.	Closed	4/23/2023	4/24/2023	403381685
4/15/2023	403374685	Form 19 Initial	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).	Samples are proposed in accordance with Table 1 or Rule 915.e.(2). In form 27 document number 404148458.	Closed	NA	4/17/2025	404148458
4/15/2023	403374685	Form 19 Initial	Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered that includes: A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill B. All pertinent information about the spill/release known to the Operator that has not been reported previously including photo documentation showing the source of the Spill or Release, the impacted area, and initial cleanup activity C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator D. Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2).A did not meet the requirements of Rule 216.	KPK provided the required information on form 19 supplemental document number 403381685. KPK recognizes that this form was submitted a day past the deadline for the form.	Closed	4/23/2023	4/24/2023	403381685
4/15/2023	403374685	Form 19 Initial	Alignment indicated in this Form 19 does not accurately reflect the alignment indicated in the related Form 44. Operator shall correct the record for this flowline within 90 days.	An updated form 44 showing the correct alignment of the flowline has been submitted, document number 404149935.	Closed	7/12/2023	4/10/2025	404149935
4/15/2023	403374685	Form 19 Initial	Referenced mapped flowline is approximately 160' away from the spill point. Operator shall provide confirmation of referenced flowline and lat/long on the next Form 19.	The flowline was originally mapped incorrectly. An updated form 44 showing the correct alignment of the flowline has been submitted, document number 404149935. The current alignment shows that the line runs through the spill point.	Closed	4/23/2023	4/10/2025	404149935

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4/24/2023	403381685	Form 19 Supplemental	Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.	An updated form 44 showing the correct alignment of the flowline has been submitted, document number 404149935.	Closed	7/12/2023	4/10/2025	404149935