

TERMINALS O&M PROCEDURE

1. Applicability LIQUID**2. Scope**

This document provides the Standard Operating Procedure (SOP) for Tank Car Loading and Unloading at Cahokia Terminal. Recommended best practices are also identified in this document. This SOP shall be used to ensure that these processes are performed in a safe manner. This procedure applies to all applicable commodities handled within liquid terminal operations. These procedures are required to be followed for the safe execution of operations; however, they are not a substitute for sound judgment. Extenuating circumstances not covered in these procedures may require modification. Such circumstances shall be addressed in the Site Specific Procedure (SSP) (where applicable). It is imperative that you address all concerns with your supervisor.

The Terminal Manager of each facility is responsible for ensuring compliance with these procedures, training appropriate personnel, and developing SSPs

3. Core Information and Requirements

The following SOP shall be used by operators when pumping products from a T/C to tanks, and vice versa.

1. Local regulations may require the use of vapor recovery equipment for particular products. Where required, vapor recovery equipment shall be utilized to meet local, state and federal environmental regulations.
2. Surveyors may be required to test and approve tanks, T/Cs, pipelines and manifolds for some products as determined by Customer needs. These special instructions shall be included on the Plant Operating Order (POO) and shall be performed before any transfer operation begins.
3. Prior to pumping off, pipelines shall be checked to ensure they are not plugged and that heat is applied during the operation, (if required). After pumping, product lines may have to be pigged or blown to ensure the lines are cleared of product and the product shall not solidify and cause problems. Hoses shall be cleared after pumping to prevent them from becoming blocked.
4. Terminal management shall provide minimum Personal Protective Equipment (PPE) requirements for all personnel involved in T/C loading and unloading operations. For guidance on PPE refer to SSP, MSDS, Terminal PPE matrix, and/or EHS job hazard analysis.
5. If meter systems are available, the procedures should be modified accordingly within the SSP.

TERMINALS O&M PROCEDURE

6. These procedures assume a POO format is used, which is not the case at all locations. Terminals that do not use a POO, still shall track all of the pertinent information stated in these procedures to maintain adequate control of the operation.
7. When unloading T/C by pressurizing with nitrogen a regulator shall be used and should be pre-set at applicable pressures as indicated in the SSP. A pressure relief valve should be installed in the nitrogen system, per proper engineering designer requirements.
8. When unloading T/Cs with nitrogen pressure, if applicable, a nitrogen-sensing valve should be installed in the T/C discharge line that would shut down the flow of nitrogen to the shore tank when liquid flow stops indicating the T/C is empty.
9. When quick-connect fittings are used in the unloading operation, a securing device shall be used to ensure that the fitting ears are securely locked in place to prevent the hose from accidentally disconnecting. (Examples: wire, Velcro, strap, tape, etc.)

3.1. EHS/Quality Precautions

1. Keep work areas clean and avoid spillage of product on the T/Cs, loading rack, equipment and ground.
2. Report all leaks, spills, and abnormal situations to appropriate personnel immediately.
3. Welding or burning is not permitted in the area unless a Hot Work Permit has been issued. If a permit has been issued and the safety of the area is in question, shut the operation down and contact EHS immediately.
4. All products requiring vapor collection and destruction shall be equipped with permissives that shall prevent loading unless the flare is operating. All permit conditions shall be addressed in the SSP.
5. The operator shall be familiar with the area and make note of the nearest fire extinguishers, safety showers and Emergency Shutdown Devices (ESD).
6. The operator shall not stand directly over the loading assembly, especially during the start of product flow. The increased pressure may cause the loading assembly to jump back and cause injury.
7. Splash Loading is defined as "allowing product to free fall into the compartment". This generates an unsafe amount of static electricity and explosive vapors inside the container; therefore, Splash Loading products with flash points below 200°F is not permitted under any circumstances. To avoid this, the loading assembly must touch the bottom of the compartment.
8. For Fall Protection: Each employee on a walking/working surface with an unprotected side or edge, which is four (4) feet or more above a lower level, shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

TERMINALS O&M PROCEDURE

9. It is recommended that a check valve be placed between the T/C and the plant tank to prevent the plant tank from back flowing into the T/C. If a check valve is not available, the Terminal Operator shall stay alert to prevent any back flow into the T/C.
10. Watco shall operate Tank Car Loading and Unloading in a safe and efficient manner to prevent harm to our employees, the environment, and the assets. In your written SSP, list and/or reference all specific environmental, health and safety, and quality precautions that must be conducted before, during, or within each section of the operating procedure. Identify the operational/safety precautions by the following terms:
 - NOTE: Used for informational purposes only.
 - CAUTION: Used when there is a potential damage to equipment or product.
 - WARNING: Used to warn against potential hazards to employees or to caution against unsafe practices.
 - DANGER: Used in major hazard situations where an immediate hazard presents a threat of death or serious injury to employees.

3.2. Minimum PPE Requirements

The following PPE is REQUIRED for this Site-Specific Procedure (per the Workplace Hazard Analysis (WHA) and or Job Safety Analysis (JSA)):



Approved Uniform

Safety Glasses/
Face ShieldHead Protection
(with reflective tape)Gloves (Appropriate for
task)

Steel-Toed Safety Boots

- I. Liquid splash goggles are required when performing maintenance on any equipment containing or thought to contain liquids, as well as transferring or otherwise handling liquid commodities.
- II. Face-shields are required in addition to liquid splash goggles when corrosive, caustic, heated and/or otherwise injurious liquids are involved.
- III. All required PPE must be worn within 25 feet of an active transfer.

Additional PPE (such as respiratory protection, hearing protection or FRC) may be required due to location, conditions, equipment, or the product being handled. Refer to the SSP and/or JHA (if required) for the PPE requirement at your location for this task. For further guidance on PPE, please see T-O&M 120 Personal Protective Equipment.

TERMINALS O&M PROCEDURE

3.3. Pre-Start Up Check

1. Customer shall notify the terminal in writing that they are sending a T/C to the terminal to be loaded or unloaded. The notification shall include at a minimum:
 - a. Product name(s)
 - b. Customer name
 - c. T/C number(s)
 - d. Net gallons of product
 - e. Total weight of product
 - f. Bill of Lading (BOL) number
 - g. Special instructions if applicable (e.g. heating, testing, tank number)
 - h. T/C return instructions (if applicable)
2. Where applicable, each terminal should have a T/C Spot Sheet and/or T/C Switch List to direct T/C routings. The Spot Sheet should contain the following:
 - a. Date sheet of railroad spot
 - b. Rack siding name and spot location
 - c. T/C status (spot, pull, hold)
 - d. Tank number
 - e. Customer
 - f. Product
 - g. T/C number
3. One copy of the T/C Spot Sheet is supplied to the railroad employee responsible for spotting the T/Cs, and another copy is retained by the terminal (if applicable.)
4. The Railroad Engineer shall refer to the T/C Spot Sheet when spotting T/Cs. After the railroad has spotted the T/Cs, a KM operator shall compare the T/C Spot Sheet with the actual locations of the T/Cs and update as necessary, (if applicable.)

T/C Pre-Transfer Inspections

1. Prior to loading, unloading, or heating a T/C, customer service shall produce a POO, which shall contain the following information:
 - a. Customer name
 - b. Date
 - c. Terminals order number
 - d. Receiving or shipping tank
 - e. Name of product
 - f. Amount of product to be transferred
 - g. T/C number(s)
 - h. Desired final innage/outage level (where applicable)
 - i. Maximum safe-fill level of the plant tank (where applicable)

TERMINALS O&M PROCEDURE

- j. Special sample/testing instructions, if applicable (i.e. collect and retain the sample only when the T/C is being pumped off).
 - k. General remarks and special instructions (i.e. heating, extra safety equipment)
 - l. Name of terminal employee who issued POO, or equivalent.
 - m. Gauge of heel remaining in T/C (where applicable).
2. The Terminal Operator is responsible for verifying the T/C number and the product information on the POO.

NOTE: If a T/C requires heating, the instructions shall be noted on the POO. Before a T/C can be heated, it shall be vented and the T/C heating coil caps shall be opened to ensure that no product is leaking through them. The Terminal Operator shall maintain the T/C at the proper temperature for unloading.

3. Terminal Operator(s) shall gauge the receiving or shipping tank, sample, and gauge the T/C(s), if required. Before any T/C gauging, sampling or inspection of an empty T/C is performed, the T/C checklist shall be completed.
- a. Record starting date and time of the operation on the POO.
 - b. Install the metal Blue Warning Sign and bidirectional derailer, in locked position, no greater than 3 car lengths ahead of the T/C (on the open end of the siding).
 - c. Bond and/or ground T/C (DO NOT use the railroad track)
 - d. Check hand brake
 - e. Install wheel chocks
 - f. Lower the ramp on top of the T/C
 - g. Inspect the T/C for leaks or cracks
 - h. Confirm the T/C arrive properly secured
 - i. Confirm all T/C outlets seals, placards and labels are in place (where applicable)
 - j. Relieve the T/C's internal pressure
 - k. Open the top dome

NOTE: Some T/Cs are never to be opened, instead an auto gauge reading shall be taken from the T/C and a sample shall be drawn from the line while it is being discharged.

4. For Unloading: Gauge and sample the T/C if required. The gauge level, time, date, temperature, water cut, and teammate name or clock number shall be recorded on the POO or gauge card. The sample bottle shall be labeled by the Terminal Operator as follows:
- a. Date/Time
 - b. T/C number
 - c. Product name
 - d. Lab responsible for analysis, if applicable

TERMINALS O&M PROCEDURE

- e. Customer
 - f. Tank number
5. T/C sample shall be delivered to appropriate location storage or lab and noted on POO.

NOTE: Some customers may require an Independent Surveyor to gauge and sample the T/C and plant tank. In these instances, a Terminal Operator shall also independently gauge the T/C and plant tank.

6. Gauge the plant tank, if required. The gauge level, time, date, temperature, water cut and operator name or clock number shall be recorded on the POO or gauge card.
7. For Loading: If a T/C is to be open top loaded, the operator shall visually inspect interior of T/C from manway to be clean, dry, and free of toxic vapors. Testing for vapors shall be addressed in the JSA and SSP.
8. The physical gauge documented on the POO shall be compared to the book inventory for possible inconsistencies. All inventory problems should be reported to the T/C Dispatcher or equivalent, and if there is not enough empty room in the tank to handle a receipt or sufficient product to complete loading a T/C, the customer shall be notified.

NOTE: For Unloading: If a T/C is to be unloaded into a commingled tank, the Terminal Operator shall ensure that the Customer shall not exceed its allocated space and that the proper Quality Control procedures are followed.

9. Prior to loading or unloading, the Terminal Operator may need to make minor adjustments to move the T/C to the proper location. If the T/C needs to be moved the Terminal Operator shall verify that the hand brake has been released and the wheel chocks, grounding cable and bonding have been removed and repositioned after moving the T/C.
10. For Unloading: If applicable, the appropriate lab shall notify KM when the T/C sample is approved. The Lab Technician's name and date of approval shall be noted on the POO. If the sample is rejected, a resample shall be taken to confirm the results. If the resample is rejected, Watco shall notify the customer and await further instruction.
11. After the T/C is correctly spotted for loading or unloading, the Terminal Operator shall check and fill in appropriate responses on the T/C checklist.

3.4. Normal Startup Operations

Not applicable. Follow Normal Operations

TERMINALS O&M PROCEDURE

3.5. Normal Operations**TOP UNLOADING WITH NITROGEN**

1. Corrosive products may require the use of special equipment (i.e. scrubbers, etc.), which must be checked. Ensure they are operating properly. (Some locations may require corrosive products to be top unloaded only).
2. The Operator shall secure T/C manway before applying Nitrogen to T/C.
3. Manway bolts shall be tightened in a star pattern with an adequate tool that provides sufficient leverage or torque to properly secure the manway cover.
4. The product unloading hose and pressurized air or nitrogen line shall be moved over the T/C.
5. The operator shall remove the blinds/caps on all applicable lines. The Terminal Operator shall ensure that the proper lines are connected to the correct tank, via secondary verification.

NOTE: A pump may be needed to assist in the T/C transfer. If this is the case, a clean and compatible pump should be included in the line set up.

6. The operator shall take the cover off the unloading outlet valve on the top of the T/C; then connect and secure the unloading hose. (The cover for the T/C nitrogen line shall be taken off to allow the connection of the nitrogen hose.) When both hoses are secure, the nitrogen and product valve shall be opened. The operator shall inspect nitrogen hoses to ensure no kinks or pinched lines. (It may take several minutes for enough pressure to build up before any product begins to flow). If there appears to be a leak, shut down the operation and repair the leak. While T/C is unloading, the operator shall walk around T/C checking for leaks.
7. When the T/C is empty, or the stop gauge has been reached, shut off the pump and/or the pressurized air or nitrogen flow. Some locations may have a flow switch that shuts down the pump and/or nitrogen flow when the product flow becomes intermittent; otherwise, air can be heard rushing through the hose when the T/C is empty.

CAUTION: If the T/C product is being transferred to a floating roof tank, care must be taken to prevent the pressurized air or nitrogen from going to the tank and sinking the floating roof.

NOTE: If a pump is being used, turn the pump on when the product flow reaches the pump.

8. If the line needs to be cleared or displaced, the Terminal Operator shall make the proper connection and estimate the amount of product flushed and note this on the

TERMINALS O&M PROCEDURE

- POO. Care shall be taken with handling the flushed product properly. Upon completion of the line flush, close the T/C valve.
9. Unless the customer authorizes releasing the T/C for transportation with nitrogen pressure, the Terminal Operator shall bleed off the pressure from the T/C after unloading is completed.
 - a. Raise the ramp
 - b. Remove the bonding cable, and wheel chocks.
 - c. Store tools in the proper locations.
 - d. Lower the blue warning flag.
 10. The operator shall close all applicable pipeline and T/C valves, secure the tank, disconnect and blind cap all applicable lines. The top outlet plugs should be screwed back onto the top product outlet and nitrogen inlet valves. All tools used shall be cleaned and returned to their proper location.

NOTE: If the T/C has been heated with steam or hot water, the Terminal Operator shall shut off the flow of steam or water through the hose 30 minutes prior to completion. Once drained and vented, connect a compressed air hose to the T/C heating line and blow out any residual steam or water. (The product lines may need to be blown or pigged before the product cools). Follow applicable SSP.

BOTTOM UNLOADING

1. Open the top dome hatch or topside vent to prevent the T/C from collapsing when it is being emptied. (In some cases when products have a very low odor threshold limit (PPB) only open the one-inch pressure connection valve or apply positive pressure with nitrogen or compatible gas). The unloading rate shall be balanced with the air intake through the one-inch valve.

NOTE: The T/C must be depressurized before opening the dome hatch.

2. The Terminal Operator shall use the proper flexible hose(s), drip pan(s), tools, and hose fittings. If a pump is needed, use a clean and compatible pump.
3. The Terminal Operator shall place and bond the drip pan under the T/C bottom outlet, check that the internal and external bottom outlet valves are closed, and then break the security seal. If the T/C has bottom ratchet valve, the Operator shall confirm open position by stencil or markings on T/C. If the Operator cannot determine the open valve position, unload from top or reject the T/C.

CAUTION: Open caps slowly and watch for signs of leaks. Rock caps back and forth while unscrewing slowly.

TERMINALS O&M PROCEDURE

4. The Terminal Operator shall unscrew the T/C bottom outlet cap, checking it for leaks, (it is acceptable to have some product collected into the cap cover). If the bottom outlet is leaking, the outlet cap should be screwed back on and the bottom outlet valves reset. If this does not work, the T/C shall be unloaded from the top. If the bottom outlet is blocked by foreign material or frozen, replace the bottom cap. If the product is frozen, apply heat to melt it, otherwise, the T/C must be unloaded from the top.
5. The Terminal Operator shall check that the proper hoses are connected to the correct tank and T/C. Every hose connection must be above containment.

NOTE: All pumps and hoses used in the operation shall be clean and compatible with the product.

6. If the hoses and pipelines need to be flushed, the Terminal Operator shall perform the proper setup (including applicable secondary containment.) Open the internal and external bottom outlet valves until the product is flowing clearly out of the hose into a suitable container. If necessary, the pump may be turned on to assist with the flush. At the completion of the flush, close the internal or external bottom outlet valve and shut off the pump, if applicable. Document an estimate of the gallons of flushed product on the POO.

NOTE: The Operator pumping the T/C is responsible for correctly handling and disposing of all flushed product. Care must be exercised not to spill any product on the ground. Operator shall complete the Product Flush Log and forward to the EH&S. EH&S shall remove and dispose of flush.

7. If necessary, prime the pump by opening the T/C internal and external bottom outlet valves and the pump's inlet bleeder valve. This shall allow the pump's inlet line to fill with product. The bleeder valve shall only be opened over a containment pan to prevent spillage.
8. When lineup to the tank is confirmed, open all applicable valves and turn on the pump. If the tank has an internal floating roof out of flotation, fill slowly until the roof is safely afloat.
9. The operator shall also check the receiving tank for any problems. Pay special attention not to fill the plant tank past its maximum fill level.
10. After completing unloading operations, verify the T/C is empty by observing the liquid level, if any, through the dome opening, or by sticking (gauge) the T/C through the pressure connection valve or eductor opening.

NOTE: If the T/C is not going to be completely unloaded, a stop gauge shall be set for the receiving plant tank.

TERMINALS O&M PROCEDURE

11. When the T/C is empty, or the receiving tank's stop gauge has been reached, shut off the pump. (Some locations may have a flow switch that shuts down the pump when the product flow becomes intermittent.)

NOTE: It is recommended that a check valve be placed between the T/C and the plant tank to prevent the plant tank from back flowing into the T/C. If a check valve is not available, the Terminal Operator shall stay alert to prevent any back flow into the T/C.

TOP LOADING- OPEN DOME

1. The operator shall depressurize the T/C by venting through the safety valve or opening vent on dome at short intervals before opening the dome cover.
2. The operator shall lower the loading arm assembly drop pipe into the T/C. (For flammable materials, to the bottom of the T/C, making certain that the defuser is touching the bottom of the T/C and that the loading arm assembly is secured in this position).

NOTE: T/Cs that are internally lined shall have a bonding cable clamped to the horizontal reach and bonded to the metal exterior of the T/C.

3. The operator shall check that the proper loading arm is inserted into the T/C by verifying that the tank number and product name on the horizontal reach, matches the POO exactly.
4. If a permanent containment system is not in place at the rail siding, the operator shall install a portable pan properly bonded.
5. Ensure that the bottom outlet valve is in a closed position with the bottom outlet cap removed.
6. Set up the shipping tank for an outbound movement.
7. Load approximately one foot of product into the T/C and check the bottom outlet valve for leaks.
8. After completing the loading operation, secure all valves and shut off the tank pump.

OVERLOADED T/C

Overloaded T/Cs cannot be pumped back to the source T/C without customer permission. The operator shall notify their Supervisor immediately upon discovering an overload.

TERMINALS O&M PROCEDURE

Overloading:

1. The Dispatcher or equivalent shall contact the customer for approval to unload.
2. The Dispatcher or equivalent shall estimate the amount of product to be unloaded from the T/C.
3. The Dispatcher or equivalent shall produce a POO to unload the T/C. (The customer shall determine if a lab analysis is required before pumping off, and any special instructions). The POO shall otherwise follow the same format as any other T/C unloading POO.
4. The Dispatcher or equivalent shall notify the supervisor about the situation.
5. The supervisor shall tell the Dispatcher or equivalent where to send the T/C and the Dispatcher shall relay this information to the Rail representative.
6. The T/C shall arrive at the proper location and follow the Site Specific unloading procedures and any special requirements listed on the POO.
7. After unloading, the T/C proceeds to the dispatch and follows the Site Specific post unloading procedures.

3.6. Normal Shutdown**POST TRANSFER**

1. After the T/C has been unloaded or loaded, the Operator shall complete the appropriate section of the checklist.
2. The Operator shall:
 - a. close all applicable valves
 - b. secure the tank
 - c. Disconnect the hose(s) from the bottom of the T/C and pump
3. Care shall be taken to either blind off the hose or drain the hose contents to containment. Store the hoses in their proper location, to keep them clean.
4. Remove the T/C fitting and screw back the bottom outlet cap onto the T/C bottom outlet and tighten with an adequate tool that provides sufficient leverage or torque.
5. Empty the drip pan(s) under the T/C and hose connections into proper container.

NOTE: For Unloading: If the T/C has been heated with steam or hot water, the Operator shall follow the applicable SSP.

TERMINALS O&M PROCEDURE

6. The Operator shall go to the top of the rack and tighten all dome cover bolts (in a star pattern) and outlet valves with the wrench. If the dome gasket is replaced note it on the POO. Raise the ramp and remove the bonding cable and wheel chocks. Store tools in their proper locations. Lower the blue warning flag once all T/Cs on that side have been disconnected and secured.

CAUTION: All hoses, bonding cable, derail wheel chocks etc. shall be disconnected or removed from the T/C and railroad track area before the blue flags are lowered allowing the railroad to perform any switching operations.

7. Both the shipping container and the receiving container involved in the T/C operation shall be gauged by a Terminal Operator and recorded on the POO. The following information shall be recorded:
 - a. Product level (innage/outage gauge level)
 - b. Product temperature
 - c. Time/date of gauging
 - d. Terminal Operator name or clock number
 - e. Sample location and type
8. The final inventory status of the T/C shall also be recorded. If the T/C is not empty, it shall be gauged and noted on the POO.
9. In addition, the receiving container shall be sampled (if applicable.) The sample label shall list:
 - a. Date of sample
 - b. Customer name
 - c. Commodity name
 - d. Receiving tank number
 - e. T/C number (origin of product)
 - f. Lab to receive sample

NOTE: When unloading a T/C into a tank, it is typically not required that the tank be sampled, unless requested by the Customer.

10. The Operator(s) responsible for the T/C operation shall fill out the completion time and date on the POO and return it and the checklist to the T/C Dispatcher or equivalent.
11. Prior to releasing the T/C, a Bill of Lading (BOL) shall be produced. If the T/C was unloaded at Watco, the Customer shall typically provide a return BOL with all necessary information. However, if Watco is to produce the BOL (which is normally the case for a T/C loading), actual loaded quantities and routing instructions provided by the Customer shall be used. The BOL for the T/C shall contain the following:
 - a. Date
 - b. Initial railroad company

TERMINALS O&M PROCEDURE

- c. Starting location (i.e. present terminal)
 - d. Consignee
 - e. Destination
 - f. T/C routing for its next destination
 - g. Delivering railroad carrier
 - h. Signature of consignor (Terminal employee)
 - i. Contents (or previous contents) of T/C
 - j. T/C number(s)
 - k. Shipper name
 - l. Agent (railroad company)
12. Typically, four copies of the BOL shall be completed. Terminal representative shall mail (or fax) one copy to the railroad company, file the second, provide the third copy to the railroad crew when they arrive at the Terminal, and send the fourth copy to the Customer.
13. Watco shall produce a T/C Pull Sheet(s) or Switch List. The CSR or Supervisor shall receive two copies of this report, giving one copy to the Railroad Engineer and keeping the second for reference. Other copies shall be given to all appropriate operators.

3.7. Emergency Shutdown

1. Should an emergency occur in another location within the plant, and the operator is instructed to shut down the operation, the operator should, if safe to do so:
 - a. Cease operation
 - b. Remove the loading assembly or disconnect the hose and turn off the pump (if start/stop controls are located at the rack)
 - c. Close the dome cover(s) remove the bonding cable and raise the walkway
 - d. Proceed to the tank, turn off the pump and secure the system
 - e. Notify supervisor and wait for instructions from appropriate personnel Shut off the Barge pump. (Emergency shut-off on the barge)

Note: Report any emergency situation to management immediately.

3.8. Startup after Emergency Shutdown

Operations shall not resume until authorization has been given by Terminal Management. Follow Normal Operations Procedures.

Note: Maintain communication with all team members throughout the restart of transfer operations following any emergency shutdown.

TERMINALS O&M PROCEDURE

4. Training

All operators who shall operate this equipment shall be trained and must be able to satisfactorily demonstrate their understanding through an assessment of this and the Site Specific Operating Procedures by a competent person or subject matter expert. The Training Matrix shall be developed for Initial and Refresher Training Requirements on procedures and shall be utilized to identify all applicable operators and track compliance with this requirement. Retraining and testing shall be conducted following unsatisfactory/unsafe performance of job assignments. Operators shall review this procedure and all SSPs pertaining to this SOP at least once every three years, not to exceed 36 months, or when operational changes warrant. However, training must be conducted and be in compliance with any regulatory agency requirement that dictates training take place on a more frequent schedule. All training must meet Watco training guidelines for frequency, documentation and demonstration of understanding

5. Documentation

The terminal must maintain an up-to-date operating procedure for each barge unloading operation for the terminal. Inspections shall be documented and records retained for a minimum of one year.

Training records shall be retained in accordance with all local, state and federal standards and Watco policy.

6. References

U.S. Coast Guard Operations Manual