

3 PORT

BARGE "HTCO 2516"

CONFIGURATION CANADA MARGORITHM CONTROL MARGORITHM CONTROL MARGORITHM CONTROL CONTROL

GAGE HEIGHT 13'-9 1/4"

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٥	879,92	283.05	B89.3	892.44	895.5	998.70	901.8	904.9	908,10	911.2	914.30	917,49	920.62	923.76	926,89	930.0	933,15	936.28	939.4	942.5	945.6	948.8	951.9	955.0	958.20	961.3	964.4	967.5	970.7	973.86	976.9	980-1	983.25	986.38	984.5	992.64	995.7	998.91	1,002,04	1,005.17	1,008.30	1,011.4	1,014.5	1,017,69	1,020.83	1,023,9	1,027,09	THE CHART IS GERTHED FOR THE ABOVE NAMED TARK ONLY, NO CHANGES O ANY KING CAN BE MADE WITHOUT THE WHITTEN CONSENT OF OUR COMPANY.
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	0.7	7	3 5	3.75	4.90	6.04	7.97	9.90	11,84	13.77	16.48	19.19	21.90	24.61	27.67	30,72	33,77	36,82	39,89	42,96	46,03	49,10	52,16	55,22	58, 29	61.35	64,42	67,49	70.56	73.64	76. 71	79,79	82.86	85,93	89.01	92,09	95.17	98.24	101,35	104,46	107.58	110.70	113.82	116.94	120.06	123.18	126,30	y)
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NOTE: GAUGE POINT LOCATED 2'-9" OFF CENTERLINE AND 3'-3" FORWARD OF AFT BULKHEAD. NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HICO-2028" THIS TANK STRAPPED 10-2-89

24 sHEETS SHEET 9 OF

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E. W. SAYBOLT & CO., INC.



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3 PORT

BARGE "HTCO 2516"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CAART IS CERTIFIED FOR THE ABOVE NAMED TANK ONLY. NO CHANGES DY ANY KIND GAN BE MADE WITHOUT THE WRITTEN CONSENT OF OUR CONFANT.

E. W. SAYBOLT & CO., INC. .. Onla pur-

BARGE "HTCO 2516"

duit coast Handowniers dannies Handownies West Coast Handownies!

Pandord Tasks 72502 April 2003 William Borise Day 146

Pandord Tasks 72502 April 2003 William Borise Day 146

Pandord Tasks 72502 April 2003 William Borise Day 146

NOTE: TANK STRAPPED AND COMPUTED IN ACCORDANCE WITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TABLES APPLY ONLY WHEN BARGE IS ON EVEN KEEL. NOTE: TANK CAN ONLY BE DECLARED EMPTY BY VISUAL INSPECTION.

NOTE: GAUGE POINT: TO TOP LIP OF 8" HATCH ON EXPANSION DOME.

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- 1	135.71 14	إ			×	586,29	7,	736.65	75	887.01	22	1,037,37	75	1,182,24	
		75			14	589.42	%	739, 78	25	890.14	×	1,040,50	-	1,190,87	
	141,95		291,89	442,19	1	592,55	-	742,91	-	893, 27	-	1,043,63	-	1,194,00	
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L	166.92		Γ		3	617.61	3	767.97	3	918.33	3	1,068,69	3	1,219,07	
L					**	620.75	22	771.11	7.	921, 47	×	1,071,83	22	1,222,20.	1
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1-	216.85	_	367.05	517.37		667, 73	-	878.09	1	968.45	,	1,118.81	1	1.269.20	
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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

NOTE: GAUGE POINT LOCATED 2'-9" OFF CENTERLINE AND 3'-3" FORWARD OF AFT BULKHEAD. NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HTCO-2028" THIS TANK STRAPPED 10-2-89.

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TANK DRLY. NO CHANGES OF ANY KIND CAN BIE MADE WITHOUT THE WRITTEN CONSENT OF OUR CONFACT.

Dala Con E. W. SAYBOLT & CO., INC.

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Guif Coast Headbustier Grees Headquares West Coast Headquarters PC Box 436* Add Swenan Olya Pasadens, Tess 7502 Kenliworth, AL 7703 Vilminston, Cattle 794s

BARGE "HTCO 2516"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHART IS CERTIFIED FOR THE ABOVE MANED TANK ONLY. NO CHANGES OF ANY KIND CAN BE MADE WITHOUT THE WRITTEN COMBERT OF OUR COMPANT.

E. W. SAYBOLT & CO., INC.



BARGE "HTCO 2516"

AGO SENSITY OF A THE STRAPPED AND COMPUTED IN ACCORDANCE WITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TANK STRAPPED AND COMPUTED IN ACCORDANCE WITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TANK STRAPPED AND COMPUTED IN ACCORDANCE WITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TANK STRAPPED AND VISUAL INSPECTION, NOTE: TANK CAN ONLY BE DECLARED EMPTY BY VISUAL INSPECTION, NOTE: GAUGE POINT: TO TOP LIP OF 8" HATCH ON EXPANSION DOME.

GAGE HEIGHT 13'L7"

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\(\tilde{\pi}\)	1,685.85	1.690.32	1,694,79	1,699,27	1,703.74	1,708.21	712,	1,717,16	1,721.63	1,726,11	1,730,58	1,735.05	1,739,53	1,744,00	1,748.47	1,752,95	1,757.42	1,761.89	1,766.37	1,770,84	1,775,31	1,779,79	1,784,26	1,788.73	1,793.20	1,797.68	1,802.15	1,806,62	1,811.10	1,815.57	1,820.04	1,824.52	1,828.99	1.833-46	1,837,94	892.94	1,846.98	1,651,30	1,855.83	÷	- 4	1,869.25			41	*1		1,896,09
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9	1,256.41	1,260.88	1.265.36	1,269,83	1,274,30	1, 278. 78	1,283,25	1,287.72	1,292,20	1,296,67	1,301,14	1,305,62	1, 310, 09	3.14.56	1, 319, 04	1, 323, 51	1,327,98	1,332.46	1,336,93	1,341,40	1,345.87	1,350,35	1, 354, 82	1,359.29	1,363.77	1, 368.24	1,372,71	1,377,19	1,381,66	1,386,13	1,390.61	1,395.08	1,399,55	1,404.03	1,40B,30	14.2.27	1,417.45	1,421, 92	1,426.39	1.430.87	1,435,34	1,439.81	1,444.29	1,448.76	1,453.23	1,457.71	1,462,18	1,466,65
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3 FT	612,34	616.80		625.72	630 18	634.64		643.57	648,04	652,51	656,99	661,46	665.93	670.41	674,88	679, 35	683.83	688.30	692,77	697, 25	701.72	706.19	710.67	715,14	719.61	724.09	728,56	733,03	737.51	741.98	746.45	750.93	755.40	759.87	764.35	768, 82	773.29	77.77	782.24	785.71	791.19	795, 66	800,13	904.61	903°08	013.55	818.03	822,50
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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

NOTE: GAUGE POINT LOCATED 3'-0" OFF CENTERLINE AND 2'-0" FORWARD OF AFT BULKHEAD. NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1994, FORMERLY BARGE "HTCO-2028" TANK NO. B STARBDARD.

висет 13 ов 24 виеств

" Osha Rusa E. W. SAYBOLT & CO., INC.

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TANK ONLY, NO CHARGES OF ANY MIND CAN BE MADE WITHOUT THE WRITTEN CONBEST OF OUR CONFINANC.



BARGE "HTCO 2516"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TARK ONLY. HO CHANDES OF ANY KIND CAN BE MADE WITHOUT THE WRITTEN CONSERT OF OUR COMPANY.

E. W. SAYBOLT & CO., INC.

- Bala Rus-

BARGE "HTCO 2516"

E. W. SAYBOLT SU CO., INC.

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6		357.30	402.37	406.85	411.32	415,79	420.26	424.73	429.20	433.67	438.14	442.61	447.08	451.56	456.03	460,50	464.97	469.44	473,91	478.38	482,85	487.32	491.79	496.26	500.73	505.20	509,67	514.13	518.60	523.07	527.54	532.01	536.48	540 95	145.42	249.69	55.83	563.30	567.77	572.24	576,70	581.17	585.64	590.11	594.58	599,05	603.52	66, 709	COLLONS
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NOTE: GAUGE POINT LOCATED 2'-8" OFF CENTERLINE AND 3'-0" FORWARD OF AFT BULKHEAD. NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HTCO-2028" TANK NO.8 PORT

: Ocha Par

E. W. SAYBOLT & CO., INC.

FORM 84

SHEET 15 OF 24 SHEETS

Guil Coast Headquarters Ostmaral Headquarters (Vest Coast Headquarters ACL Boy Adds 400 Months, No. 107039 Vitembritch, Calif. 90748

BARGE "HTCO 2516"

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GAGE HEIGHT 13'-6 1/2"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHARTIS CERTIFIED FOR THE ABOYK NAMED TANK ONLY. NO CONTRACT
ANY KIND CAN BE MADE WITHOUT THE WRITTEN CONSENT OF OUR CONFANT.

E.W. SAYBOLT B CO., INC.

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TORES .

GAGE HEIGHT 13'-6 7/8



BARGE "HTCO 2516"

MEASUREMENT". DECLARED EMPTY BY VISUAL INSPECTION

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BARRELS OF 42 U.S. GALLONS CAPACITIES GIVEN IN

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GAUGE POINT LOCATED 3'-0" OFF CENTERLINE AND 2'-0" FORWARD OF AFT BULKHEAD. THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HTCO-2028" TANK NO. 7 STARBOARD NOTE: NOTE:

This chart is certified for the above named tank cally, no charges of any kind can be lade without the written combent of our company.

Lynn 747

E, W. SAYBOLT & CO., INC.

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Gulf Cost Meadquinter dankial Handaueters Well Cost Headquisters P.O. Box 4984 — 400 Services Dec 118 C Dec 118 Psychologics, Park P.P. 2003 Willington, Call. 30748

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BARGE "HTCO 2516"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHART IS CEPTIVED FOR THE ABOVE NAMED TANK ONLY. NO CHANGES OF ANY KIND CAN BE MADE WITHOUT THE WHITTEN CONSENT OF CUM CONFINING.

E. W. SAYBOLT & CO., INC.

OF 24 SHEETS SHEKT 18

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BARGE "HTCO 2516"

OLUI CONTI MENGOUATION GENERAL MANDE COMMUNICATION MENDO AND SAME TO COMMUNICATION MANDE AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND SAME AND COMPUTED IN ACCORDANCE NITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TABLES APPLY ONLY WHEN BARGE IS ON EVEN KEEL. NOTE: TANK CAN ONLY BE DECLARED EMPTY BY VISUAL INSPECTION. NOTE: GAUGE POINT: TO TOP LIP OF 8" HATCH ON EXPANSION DOME.

GAGE HEIGHT 13'-7"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS
NOTE: GAUGE POINT LOCATED 3'-O" OFF CENTERLINE AND 2'-O" FORWARD OF AFT BULKHEAD.
NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HTCO-2028" TANK NO. 7 PORT

E. W. SAYBOLT & CO., INC.

" Dalia Rum

#HEET 19 OF 24 AMEETS



Gulf Coast Mesdguerters General Mesdgurists West Coast Headquariers 400 Securation Drive Dec 1346 Dox 1346 Pasados, Teas 77502 Kentiworth, NJ. 07033 Wilmfraton, Calif. 90748

5 STBD.

BARGE "HTCO 2516"

GAGE HEIGHT 13'-7"

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27		127	2,125.79			35	77	72		22	77	20	5	×
X.	1,915.85	17	2,130.24	74		*	74	7,		**	*	*	7	×
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	1,983.00	×	2,194.21	27.		78.	**	×		%	72	×	*	×7.
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74	2.059.00	**	2.244.61	*		*	*	*		*	72		-24	*
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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TANK DILLY. NO CHANGES OF ANY KIND GAN BE MADE WHISIOUT THE WRITTEN CONSENT OF OUR CONSENT.

E. W. SAYBOLT & CO., INC. . Oaka Rom

янеет 20 от 24 висятя

rosk #4

GAGE HEJGHT 13'-6 1/4"



BARGE "HTCO 2516"

PARCIE TICO ZOTO

A OF STANDARD SHIP AND COMPUTED IN ACCORDANCE WITH API STANDARD 2553, "LINEAR MEASUREMENT".

NOTE: TABLES APPLY ONLY WHEN BARGE IS ON EVEN KEEL. NOTE: TANK CAN ONLY BE DECLARED EMPTY BY VISUAL INSPECTION.

NOTE: GAUGE POINT: TO TOP LIP OF 8" HATCH ON EXPANSION DOME.

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CAPACITIES GIVEN IN

*ACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS
NOTE: GAUGE POINT LOCATED 3'-0" OFF CENTERLINE AND 38'-P" FORWARD OF AFT BULKHEAD.
NOTE: THIS BARGE WAS STRAPPED IN JANUARY 1984, FORMERLY BARGE "HTCO-2028" TANK NO. 6 STARBOARD.

E. W. SAYBOLT & CO., INC. THIS CHART IS CETTIVIED FOR THE ABOVE MANDED TANK ONLY. NO CHANGES OF ANY KIND CAN BE MADE WITHOUT THE WRITTEN CONBKNT OF OUR COMPANY.

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CAPACITIES BIVEN IN BARRELS OF 42 U.S. GALLONS

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TANK ONLY. NO CHARDES OF ANY KIND CAN BE MADE WITHOUT THE WINTEN CONSERT OF OUR CENTERALY.

E, W. SAYBOLT & CO., INC. " Baha Run

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BARGE "HTCO 2516"

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS
NOTE: GAUGE POINT LOCATED 3'-0" OFF CENTERLINE AND 38'-1 3/4" FORWARD OF AFT BULKHEAD.
NOTE: THIS BARGE WAS STRAPPED IN JAMUARY 1984, FORMERLY BARGE "HTCO-2028" TANK NO. 6 STARBOARD.

E. W. SAYBOLT & CO., INC.

THIS CHART IS CERTIFIED FOR THE ABOVE NAMED TANK ONLY, NO CHARGES OF ANY KIND CAN BE MADE WITHOUT THE WRITTEN CONSENT OF DUR CONFINE

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BARGE "HTCO 2516"

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BARRELS OF 42 U.S. GALLONS CAPACITIES GIVEN IN COMPUTED BY: HM 10-13-89 CHECKED BY: HM 10-13-89

E. W. SAYBOLT & CO., INC. · Dha Ran

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BARGE "7007" 1/70 3007 West Coast meadopailers P.O. Box 1148 Whitington, Calif 90048 E. W. SATBOLT SU CO., INC.

General Rescounters 400 Septices Direct Recognition in a 00000

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| The control of the CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS
THUR CHART TABLE APPLIES ONLY WHEN BARGE IS ON EVEN KEEL.
NOTE: CAUGE TABLE APPLIES ONLY WHEN BARGE IS DOWN BY STERN SUBTRACT 1 1/4" FROM EACH INNAGE CAUGE FOR EVERY ONE FOOT OF DANG.
NOTE: GAUGE POINT LOCATED 2'-10" OFF CENTERLINE BULKHEAD AND 6'-6" FOGWARD OF AFT. BULKHEAD 9 TOP

B. M. SAYBOLT & CO.

E. E. Hickon

E. W. SAYBOLT & CO., INC

Wast Cobst Headywriest. P.O. Oca 1146 Widdington, Caul 90148 E. W. SAYBOLT Se CO., INC. Consert Headquarters 400 Swerson Dave Menéwarra N. J. 07002 Gud Coast Headquarers P.C. Bar 4364 Pasadorer Fases 13522

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E W. SAYBOLT & CD, INC

THIS CHAMT IS CERTIFIED FOR THE ABOVE NAMED TANK ONLY NO CHANGES OF ANY KIND CAN BE HADE WITHOUT THE WRITTEN CONDENT OF OUR COMPANY

BARRELS OF 42 U.S. CALLONS CAPACITIES GIVEN IN

SHEET 2 OF B SHEGES FORM CONTRACTOR

West Coral Headquaring P.O. Ber 1926 Waynington, Calif. 90783 E. W. SATBOLT > U CO., INC. Gulf Chast Headquartes General Readquartes F.D. Box 43d 43d 43d 500 Centrion Drive Péried ne res 11502 Nonventes, 3t 4 07033

BARGE "7007" 1/770 3007

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS
NOTE: GAUGE TABLE APPLIES ONLY WHEN BARGE IS ON EVEN REEL.
NOTE: HAND SHAME APPLIES ONLY WHEN BARGE IS ON EVEN REEL.
NOTE: HIND SHAME IS DOWN BY STERN SUBTRACT 3 1.4" FROM EACH INNAGE GAUGE FOR EVERY ONE FOOT OF DRAG.
E. W. SAYBOLT & CO.
WHERE 3 ON B HERE! FORK SA JARY 6,7%;

" E. E. Hildrang

E W. SAYBOLT & CO INC

Oul Case Headquaritis Central Headquarius Heat Case Kisadquarius P.O. Gos Abba Postadoro Tosas 175cs Revieworn, N. J. 07233 Waterpijov, Cast 146 L. W. SAYBOLT SU CO., INC.

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THIS CHART IS CERTIFIED FOR THE AGOVE NAMES TANK ONLY NO CHANGES OF ANY MIND CAN BE WADDE WHINGUT THE WRITTEN CONSIGNT OF OUR COMPANY.

E. W. SAYBOLT & CO., INC.

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" 6. E. Kuldang

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E. W. SATBOLT > 6 CO., INC.

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18 E 15'-3 5/8' CENTER -က GAGE HEIGHT E E __ . 16 π. 3 5 3 ¥ L 12 3/4 74 F B 9 2 2 2 West Coast Headquarters P.O. Box 1146 Videxington, Cabr. 86749 General Presidentiers 400 Swenson Drive Renitwarth N. J. C7002

ANY KIND CART IS CERTIFICE FOR THE ABOVE MAMED TANK ONLY IN CHANGES OF ANY KIND EAN BE MADE WITHOUT THE WRITTEN COMBENT OF DUR COMPANY

E. W SAYBOLT & CO., INC

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CAPACITIES GIVEN IN BARRELS OF 42 U.S. GALLONS

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Out Coast Resignance - Galvette Haddoutsine West Coast Haddoutses 9 O East 654 - 400 General President President France 7702 - Ketsteine H. N. O'CAS - Williams Coast 90745 E. W. SAYBOLT > 4 CO., INC.

BARGE "7007". //70. 3007

4 CENTER

CAPACITIES GIVEN IN BARREIS OF 42 U.S. GALLONS
NOTE: GAUGE TABLE APPLIES ONLY WHEN BARGE IS ON EVEN KEEL.
NOTE: WHEN BARGE IS DOWN BY STERN ADD 1 1/4" TO EACH INNAEE GAUGE FOR EVERY ONE FOOT OF DRAG, NOTE: SAUGE POINT LOCATED 2'-10" OFF CENTERLINE SULKHEAD AND 57'-6" FORWARD OF AFT. BULKHEAD, WHEN 7 O' 8 SHEET

6 6. Hucland E. W. SAYBOLT & CO., INC.

CHART IS CERTIFIED FOR THE ABOVE HANKD TAHN ONLY HO CHANDER OF Y KIND CAN BE HADE WITHOUT THE WRITTER CONSERT OF OUR COHFAMI

FDAM 34 INTY BITTO

E. W. SATBOLT > 4 CO., INC.

"BARGE "7007" #70 3007

4 CENTER

GAGE HEIGHT 15'-3 1/4"

NOTE: BARGE STRAPPED AND COMPUTED FOR THE INGALLS IRON WORKS CO., DECATUR, ALABAMA.

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E. W SAYBOLT & CO., INC.

E. E. Hilland

CAPACITIES GIVEN IN BARRELS OF 42 U.S. CALLONS STRAPPED BY: HER 6/11/80 CHECKED BY: SO 6/25/80 HEREKED BY: SO 6/25/80

FORM PLINEY 9:781

INSPECTORS OF PETROLEUM

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28 U.S.C. § 1746 UNSWORN DECLARATION PRESTON N. SHUFORD

My name is Preston N. Shuford, and I am above the age of eighteen (18) years and have never been convicted of a felony or crime involving moral turpitude. I am fully competent to make this declaration. I have personal knowledge of the facts stated herein and they are all true and correct.

I am employed as the Vice President of Maintenance for Higman Marine Services, Inc. ("HMS"). My job duties include overseeing the the repair, maintenance and construction barges and towhoats owned and/or operated by Higman Barge Lines, Inc. ("HBL") and a sister company named Maryland Marine, Inc. I was employed in a similar capacity for HBL prior to January 1, 1998 and at all times relevant to HBL's vessels being serviced by the Palmer Barge Line shipyard.

I am familiar with the towboat JOE M. POWELL. The M/V JOE M. POWELL was built in 1978 and was 60.2 feet in length and 24 feet in breadth. The hull depth of the M/V JOE M. POWELL was 8.2 feet. The JOE M. POWELL had an engine room measuring 16 feet long by 24 feet wide. The depth of the bilge space of the vessel was no more than twelve inches near the sideshell and 24 inches at the keel. Excluding the vessel traming, piping, and other equipment in the bilge space, the volume of the M/V JOE M. POWELL's bilge space was 576 cubic feet. In terms of fresh water, this equates to 4308 gallons.

The JOE M. POWELL had four diesel engines, two for propulsion and two for the generation of electricity. The propulsion engines were 353 Caterpillar engines. The oil capacity of these engines was 16 gallons each. The generator engines were Detroit Diesel 471 engines with a capacity of 5 gallons each.

I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of May, 2008.

Preston N. Shuford

5/13/08

851 S. Reynolds P.O. Box 296 La Grange, Texas 78945

Report on the Potential Source of PNAs

Benzo(a)pyrene and Benzo(a)anthracene

Attributed to Higman Barge Lines

This report addresses the possibility that benzo(a)pyrene ("b(a)p") and benzo(a)anthracene ("b(a)a") were deposited on the soils at the Palmer Barge Line Superfund Site as a result of spillage of either butterworth washings, barge steamings, or other activities carried out by Palmer that would have resulted in either of the two named compounds entering the soils to be excavated as part of the remediation at the Site.

In order to evaluate the possibility that Higman's barge residues might be responsible for the soil contamination by b(a)p and b(a)a, a theoretical exercise was made that examined the quantities of waste found in site soils and the quantities of Higman waste required to create those waste quantities. File document were used as background for the evaluation: The Superfund Record of Decision, September 2005, Affidavits of John T. McMahan and Randy Laughlin (Original and Supplemental), and Page 3 of the Administrative Order identifying in Item 10 the list of hazardous substances found at the Site. Other sources of information are identified in the footnotes.

I have been an environmental consultant for over 30 years. My resume is attached for reference.

Some assumptions are required for this evaluation. They are listed as follows:

- 1. The quantity of soils that are contaminated is taken as 1,204 cubic yards
- 2. The level of b(a)p in that was is 280 mg/kg¹
- 3. The level of b(a)a is that waste is 240 mg/kg²
- 4. The solubility of b(a)p in water is 3.8×10^{-3} mg/L³
- 5. The solubility of b(a)a in water is $5.7 \times 10^{-3} \text{ mg/L}^4$
- 6. The content of b(a)p in Vacuum Gas Oil ("VGO") is 0.1 wt. Percent⁵
- 7. The content of b(a)a in VGO is 0.1 wt. Percent (assumed to be the same as b(a)p
- 8. One cubic yard of soil at the Site weighs 2000 lbs (1 Ton) (assumption)
- 9. Crude oil contains 10% VGO (assumption)

¹ Record of Decision, Table 8

² Record of Decision, Table 8

³ EPA Hazardous substances List

⁴ EPA Hazardous substances List

⁵ Marathon Oil Co. MSDS 0229MAR019

Using these values I was able to estimate the quantity of water needed to infiltrate the site soils to deposit the quantity of b(a)p and b(a)a reported in the Record of Decision (Table 8). In summary here are the pertinent calculated values:

- a. There are 577.92 pounds of b(a)p in the soils to be removed from the Site
- b. There are 674.24 pounds of b(a)a in the soils to be removed from the Site
- c. The volumes of water required to deposit the calculated b(a)p and b(a) are 18.264 and 14.205 billion gallons, respectively.
- d. The quantity of VGO required to have been spilled at the Site to account for the quantity of b(a)p and b(a)a in the soils to be removed is 64,162 and 74,855 gallons, respectively.
- e. The quantity of crude oil required to have been spilled at the Site to account for the quantity of b(a)p and b(a) in the soils to be removed is 641,620 and 748,557 gallons, respectively.

The quantities of water and oils, VGO and crude, resulting from the calculations are unreasonably large. To gain perspective, the volume of the soils to be removed is only 243,160 gallons. So the quantity of crude is several times the volume of soil to be removed and the volume of VGO is approximately 25% of the soil volume. The volumes of water are absurdly high in comparison to the volume of soil to be removed.

To further evaluate the possibility for contamination to be derived from wastes from Higman barges, alternative assumptions can be made. For example if we take the TR as 1×10^{-6} for b(a)p which is 0.23 mg/kg (ROD Table 8) as the contaminant level, I can calculate a smaller quantity of b(a)p in the site soils. This assumption reduces the quantity of water required by approximately 1000 times. However, the volume of water is still inconceivably large at 17.5 million gallons.

There are similar reductions in the quantities of VGO and crude oil. Those reductions could, however, be considered reasonable to occur. Using the b(a)p value for the TR at 1 x 10^{-6} (0.23 mg/kg) as the contaminant level, requires about 1 drum of VGO and 15 drums of crude oil.

There are two facts that would limit the loss of these materials to the environment: their inherent value as fuel for Palmer in the production of hot water and steam for cleaning barges⁶, and the fact that it would be difficult, if not impossible, to spill these quantities uniformly over an area as large as that to be excavated (Ref. Alternative 4 in the ROD). If we assume that 90% of the VGO and crude oil was recycled or sold by Palmer the 15 drums of crude would be 1.5 drums and the 1 drum of VGO becomes 0.1 drum. Further, at the lower concentration of b(a)p assumed in the further evaluation, the Higman contribution by spills of VGO or crude would approach 10% of the concentration to produce a 1×10^{-6} risk level (resulting in no risk) and nearing the minimum detection limit of b(a)pin soils..

⁶ Randy Laughlin in his Supplemental Affidavit, paragraph 5. I agree with Mr. Laughlin's assessment that recovered crude and VGO are valuable commodities for eiter sale or internal use.

In conclusion, calculations indicate that Higman Barge Line could not have been responsible for site soil contamination at the maximum or toxic trigger levels indicated for b(a)p and b(a)a by means of waste water discharge. Spillage to generate contamination at the maximum soil concentration value of VGO or crude oil produces more oil than soil to be removed, an impossible situation. Similarly, if the risk level is lowered to the trigger value of 1 x 10⁻⁶, water spillage is still too large to be reasonable for a small site and if the valuable hydrocarbons, crude oil and VGO, were recycled by Palmer, and still 10% was lost the levels in site soils are below the 1 x 10⁻⁶ risk level and would not require remediation.

ASSOCIATES, INC.

851 S. Reynolds P.O. Box 296 La Grange, Texas 78945

PAUL FAHRENTHOLD

hazardous waste treatment remedial program design process engineering

EDUCATION

Florida State University: Postdoctoral Fellow, 1966 University of Houston: Ph.D., Chemistry, 1966 Rice University: M.S., Chemical Engineering, 1962 University of Texas: B.S., Chemical Engineering, 1960

REGISTRATION

Registered Professional Engineer: Mississippi and California

PROFESSIONAL HISTORY

Fahrenthold & Associates, Inc., 1988 to Present
ENTRIX, Inc, Vice President, Waste Management/Water Resources Group, 1986 to 1988
Woodward-Clyde Consultants, Senior Consultant, 1982-1986
U.S. Environmental Protection Agency, Chief of Organic Chemicals Branch, 1972-1982
Calumet Petrochemicals, Vice President, 1967-1972
Calumet Industries, Technical Assistant to the President, 1967-1972
Texas Eastman Company, Research Chemist, 1966-1967

REPRESENTATIVE EXPERIENCE

Fahrenthold & Associates has completed a number of environmental engineering and process chemistry development projects. Those projects have focused on the detection and quantification of contaminants in various media, design and construction supervision of facilities for restoration of the environment, recovery of raw materials, treatment of waste water discharges and atmospheric emissions, and the evaluation of data for clients desiring contributions from named and unnamed PRPs.

Abstracts of representative projects are provided below.

Pacific Sound Resources-Seattle, WA

Fahrenthold & Associates designed a combined biological and physical/chemical treatment system for removal of hydrocarbons from groundwater at the facility. The design included coordination of the pumping system and transport of the water to the treatment system, supervising and coordinating the design of the biological treatment facility, and preparing the monitoring program for the facility to determine compliance with the environmental regulations.

In addition to the engineering work for treatment projects identified above, Fahrenthold & Associates has coordinated the groundwater investigations at two sites in the Seattle area. In doing so the company's staff has gathered experience in groundwater management, infiltration, tidal effects and other aspects of water management.

Joleen Way PRPs-Morgan Hill, CA

For this group Fahrenthold & Associates designed and supervised the construction of a multi-location treatment complex for contaminated groundwater.

The design included preparation of the process and instrument diagrams for the facility, selection of equipment and supervision of its installation. The treatment process used was adsorption of organics from solution followed by their recovery by steaming the adsorbent beds and recovering the organic contaminants. Several of the treatment facilities were located some distance from treatment. Pipelines for vapor and water were designed and installed to transport these fluids to environmentally suitable locations.

After completion of construction, Fahrenthold & Associates operated the facility for a number of years, including the maintenance and monitoring programs.

Process Chemistry Experience

For a major refiner in northern California a survey was made of the 17 pools of hydrocarbon under the facility to determine their age. Calculations were prepared that indicated the relative age of the deposits, as possible. Most of the calculations focused on the loss of hydrocarbon components through the vadose zone, the primary mechanism of ageing. The data produced in the study were used to prepare a chain of liability for the facility that had operated since early in the 20th century.

For a major utility in New Mexico a survey was made of a facility where field condensate had migrated from the field tanks to the general area outside of the battery limits of the production area. The loss of hydrocarbon components from the deposit of hydrocarbons in the ground into the vadose zone was calculated and found to coincide with a spill event six years before sampling occurred. The data were used to determine the entities' liable for the loss of hydrocarbon from the facility.

For a Connecticut corporation Fahrenthold & Associates developed an in-situ process for the destruction of carbon disulfide. The process, after development, was approved by EPA for field implementation. Field implementation led to treatment of approximately 10,000 yards of contaminated soil. The process was subsequently patented by the company.

In the defense of refiners in Texas, Fahrenthold & Associates surveyed three facilities to determine the origin of benzene emissions. The sources were then modeled backward in time (from 1975 to the early 1980s) using process correlations developed by the API and the USEPA. The calculated process emissions were used as input for a dispersion model of each of the facilities.

In a project in Pennsylvania Fahrenthold & Associates evaluated the process chemistry for evaluation of contaminants at a disposal site that had potentially migrated to nearby groundwater supplies. The evaluation required the reconstruction of process chemistry used to manufacture resorcinol and petroleum sulfonates and the development of an analysis method for these non-priority compounds.

In a cost recovery case for a refiner in Houston, Fahrenthold & Associates evaluated the chemistry and material balance production of wastes from a paint manufacturing facility and a major paper mill to determine if their chemical signatures matched the wastes deposited at a disposal site under remediation. The material balance was constructed to determine if the wastes generated were in general agreement with the volumes recorded as disposed at the site.

For a major utility company Fahrenthold & Associates developed an analytical methodology and assisted in developing a procedure for the determination of the quantity of bunker fuel in a soil matrix. The soil matrix was contaminated with a highly aromatic product (pitch). A mathematical algorithm was used to estimate the quantities of bunker fuel, pitch and diesel fuel in the soil matrix. Standard, but not environmetal, analysis techniques were used to establish the data base for the required calculations.

Cost Recovery Projects:

Cost Recovery and Allocation Model Creation or Evaluation: Through the use of air modeling and material balance data for a series of facilities the basis for cost modeling and allocation of remediation costs was created. The methodology developed for the facilities, all of which were similar, was used at four installations as the basis for contribution actions.

This air deposition modeling technique was used successfully to determine the individual liability for multiple operators of several facilities over an extended time frame.

The entire methodology was recently presented at a national meeting of the Society of Risk Assessment as a means to evaluate the risk potential of soil contamination from atmospheric deposition of particulate matter.

Other studies focused on cost allocation have been successfully completed which were designed to use either air deposition modeling or studies of chemical differences among or between operating periods and facilities to determine contribution to chemical contamination.

Chemical Material Balance Projects and Background Information

As a young chemical engineer I was a process engineer for Union Carbide Corporation in the design of plants to procduce ethyleneamines and oxo alcohols. Subsequently, I designed a full scale plant for Calumet Industries for the manufacture of sulfonic acids and their salts to be used as lubricating oil additives.

I have directed and worked in pilot plants and chemical research labs in the development of various production and waste treatment processes.

When I was in the EPA I became the Branch chief of the Organic Chemicals Branch of the Office of Water, Industrial Technology Division (new name). In that position my staff and I developed a procedure to prioritize industrial chemical processes according to their capacity to generate toxic pollutants. The process is relatively simple requiring knowledge of the raw materials and the chemistry of the processes used at the facility. This sounds simple but it requires practical knowledge of industrial chemistry and industrial operations.

Using this formula we were able to analyze the top 100 chemical and polymer production processes for their production of toxic chemicals into all media (solid wastes and effluents) on a unit of raw materials basis. We also did the pesticide and pharmaceutical industries. As a result of the analyses we were ale to design treatment technology suitable for regulation, where necessary.

I have done a lot of chemistry projects in the past few years. For Jones, Day in Houston (Michael Gibson is the contact) I did waste material balances for PPG industries (paint manufacturing chemistry) and for Champion Paper in Pasadena, Texas (all types of paper plant processes such as bleaching, wood yard, lime kiln, digestors, etc.).

I also did a material balance study for the DelAmo site in California. I looked at the process chemistry for butadiene and synthetic rubber manufacture at the complex. I believe that the issue was similar to the one presented to me by Jones, Day in that there was an allocation to be made at the site.

In cooperation with Jacobs Engineering a survey was made of the lube additive and transformer oil processes at their Gretna facility to evaluate their process chemistry and engineering designs. The evaluation had as its goal minimizing waste generation by the facility through process modification and better waste management. The project closed with a report of the process options available and their cost.

