

**Sector Mobile
Area Contingency Plan**

Alabama, Mississippi, Northwest Florida



June 2013

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
Eighth Coast Guard District

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16471
22 Mar 2013

MEMORANDUM

A handwritten signature in blue ink, appearing to read "E. J. Cubanski, III".

Digitally signed by CUBANSKI,EDWARD.J.III.1014188939
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USCG,
cn=CUBANSKI,EDWARD.J.III.1014188939
Reason: I am the author of this document
Date: 2013.03.22 15:19:06 -05'00'

From: E. J. Cubanski, III, CAPT
CGD EIGHT (dr)

To: CG SECTOR Mobile

Subj: APPROVAL OF 2013 SECTOR MOBILE AREA CONTINGENCY PLAN

Ref: (a) CGD EIGHT New Orleans LA 311313Z Oct 12

1. Congratulations to you and your staff! Your subject plan, as updated, has been reviewed by my staff and determined to be in substantial compliance with reference (a) and all of its references. Please issue a letter of promulgation and post the approved ACP to Homeport no later than 1 Jun 2013.

2. Please also pass along my thanks to your Area Committee (AC) for the effort that went into this latest update. Continuous improvement, and maintaining the current momentum, will ensure that we are always prepared to effectively respond to oil discharges and hazardous substance releases in the coastal zone. To assist with this momentum, in the course of this ACP review, my staff identified areas that warrant consideration as your AC prioritizes its work, as part of the ACP review cycle in accordance with reference (a); see enclosures (1) and (2).

3. If you have any questions regarding this matter, please contact LT Christopher G. Buckley at (504) 671-2233 or the CGD 8 (drm) email address: D08-DG-District-DRM@uscg.mil.

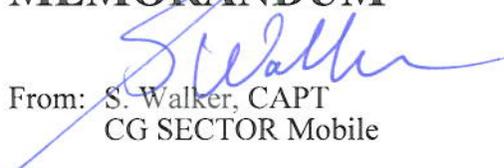
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Enclosures: (1) Area Contingency Plan Review Summary (see D8 SharePoint site)
(2) Area Contingency Plan Review Checklist (see D8 SharePoint site)



16471
15 April 2014

MEMORANDUM


From: S. Walker, CAPT
CG SECTOR Mobile

To: CGD EIGHT (drm)

Subj: 2014 SECTOR MOBILE AREA CONTINGENCY PLAN UPDATE

Ref: (a) CGD EIGHT New Orleans LA 311313Z Oct 12

1. This promulgates the annual revised Sector Mobile Area Contingency Plan.
2. The ACP is designed to meet the requirements and intent of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), it is aligned with the National Response Framework (NRF), and is built around the principles of the National Incident Management System (NIMS). This plan is effective immediately and supersedes previous editions of the Sector Mobile Area Contingency Plan.
3. This ACP is electronic, enabling users to rapidly access a wide range of supporting documents that are linked to the ACP. For the ACP to provide maximum support, responders and members of the Area Committee, along with other port partners, must continuously update and revise the ACP based on lessons learned and/or best practices through exercises and actual responses. Response personnel should make themselves familiar with this plan.
4. This ACP highlights the national importance of the Mississippi, Alabama, and Northwest Florida area, both environmentally and economically, and is the culmination of excellent cooperation and teamwork from the members of the Area Committee.

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Enclosures: (1) Record of Changes page from the Sector Mobile ACP

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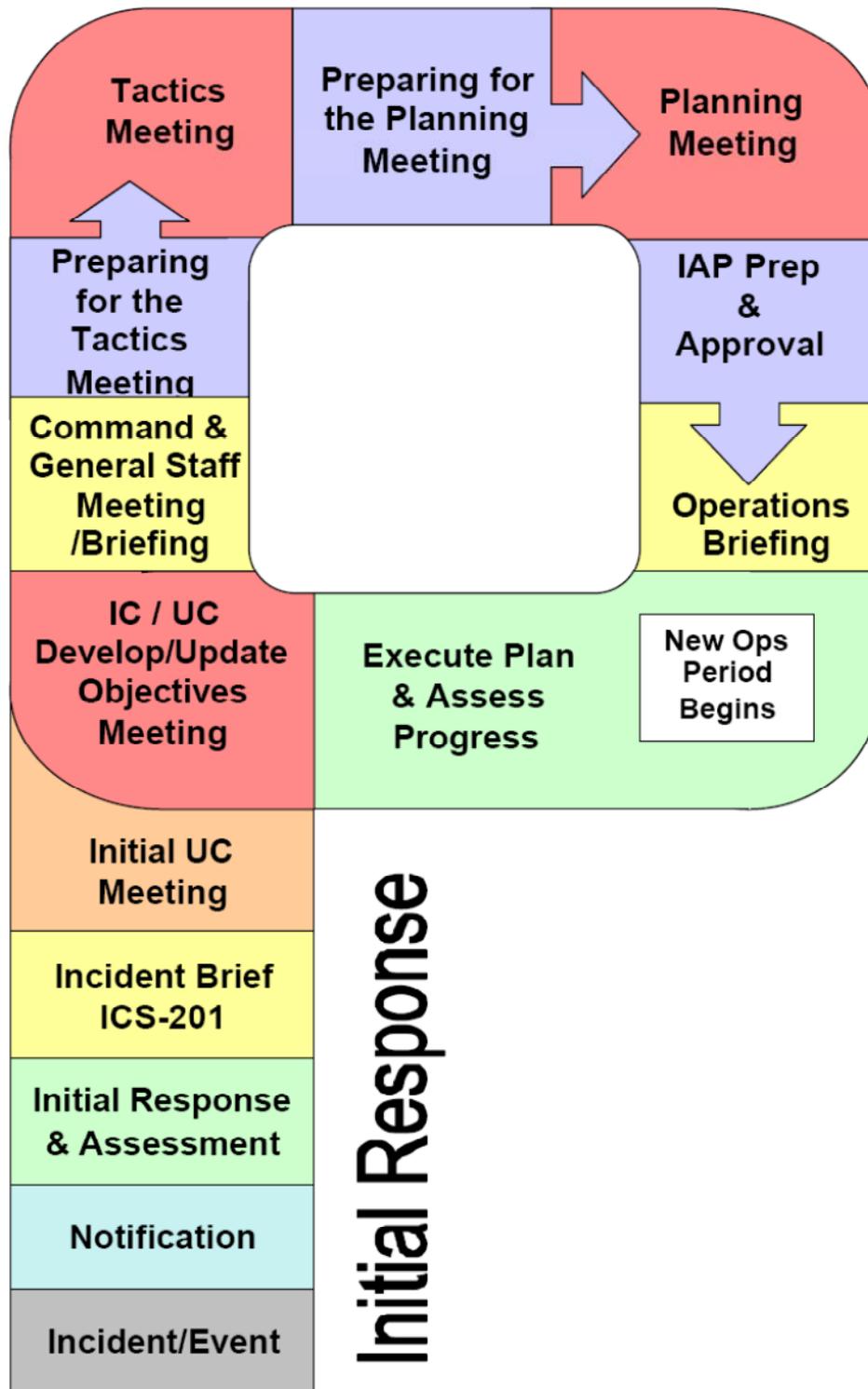
This is the Sector Mobile Area Contingency Plan (MOBACP). This plan is written in accordance with the Regional Response Team IV Regional Contingency Plan and the National Contingency Plan. Federal, State, Tribal Parish and Local government representatives as well as representatives from commercial, non-profit, and private concerns continue to drive this planning effort. All Federal, State, Tribal, and Local response organizations that are members of Regional Response Team IV and the Sector Mobile Area Committee should use this plan for responses to oil and hazardous materials spills, drill, and exercises.

This plan supersedes all previous editions. In addition, the entire document has been reviewed and updated, as appropriate, to reflect as up to date information as possible. All chapters contain changes and should be reprinted to ensure users have the most recent version of the MOBACP.

Geographical Response Plans (GRPs) are developed for all of the coastal and inland waters of the MOBACP geographical boundaries. The GRPs are considered part of the MOBACP but may be distributed and revised separately. These maps can be accessed online at <http://ocean.floridamarine.org/acp/MOBACP>.

The Sector Mobile Area Committee encourages active participation by all interested parties in the continuing area contingency planning process. Comments, suggestions, and corrections should be directed to the New Orleans Area Committee.

The effective date of this plan is 01 February 2013



Initial Response

REQUIRED NOTIFICATIONS

All spills of oil or hazardous substance into navigable waters as defined by the Clean Water Act (CWA) and all spills of a reportable quantity of hazardous substance (40 CFR Part 302) must be immediately reported by the spiller to the National Response Center (NRC). The NRC will contact appropriate local US Coast Guard (USCG) or Environmental Protection Agency (EPA) offices. Notifying state offices does not relieve the spiller from federal requirements to notify the NRC or vice versa.

NATIONAL RESPONSE CENTER (NRC)

1-800-424-8802 Toll Free 24hrs

1-202-267-2675 Toll Call 24hrs

In addition to contacting the NRC, spillers may contact the nearest USCG or EPA office. For spills in the Captain of the Port Sector Mobile area of responsibility contact:

Sector Mobile

251-441-5720

For spills occurring in the inland zone contact:

U.S. Environmental Protection Agency

1-866-EPASPILL (372-7745)

FIRST RESPONDER GUIDELINES

REMAIN UPWIND, UPHILL, OR UPSTREAM OF THE INCIDENT. FROM A SAFE DISTANCE, assess the situation. Use binoculars, if available, to view the scene. Attempt to determine if radiological materials or hazardous substances are present.

Observe and note the following:

- Effects on people, animals, and the environment;
- Container types, markings, placards and labels. If available, use the DOT Emergency Response Guidebook for reference;
- Signs of any release or discharges substances and any unusual or pungent odors (move farther away or upwind if you detect an odor and are not positive it is safe);
- Wind direction and prevailing weather;
- Distance and direction of nearby dwellings; and
- Distance and direction of any nearby surface water.

The initial responder shall make all appropriate notifications. The initial responder shall not enter an area where the responder may become a victim, even to rescue another.

Until help arrives, the initial responder should:

Cordon off the incident area and establish a safety zone. If chemical vapors or flammable/explosive materials are involved, evacuate all persons from the immediate area and remain upwind of the incident area; if sources of radiation or radioactive materials are suspected to be involved, use the principles of time, distance, and shielding to reduce potential exposure;

Enter the incident area only if properly trained and equipped with appropriate protective clothing and equipment;

Render first aid to victims; be sure to notify medical personnel if radiation exposure or contamination is suspected;

Serve as an on-scene communication point;

Brief the response team leader or incident commander upon arrival.

INITIAL ASSESSMENT/INFORMATION CHECK-OFF LIST

The following information should be collected for all spills reported to member agencies:

- Date and Time of Call:
- Caller Name, Address, & Phone Number:
- Name of Person Taking the Report:

VESSEL/FACILITY/SPILLER INFORMATION:

1. Name of Potentially Responsible Party
2. Name of vessel/facility. Railcar/truck number or other identifying information
3. Type and size of vessel/facility
4. Total quantity of fuel on board or in tank
5. Nationality (vessel only)
6. Location of Incident (i.e. street address, lat/long, mile post)
7. Date and time of incident (or when discovered)
8. Description of spill (i.e. size, color, smell, etc.)
9. Type of incident (i.e. explosion, collision, tank failure, grounding, etc.)
10. Material released/discharged
11. Source of material released/discharged
12. Estimated amount released/discharged
13. Total potential quantity that could be released/discharged (i.e. total quantity in tank or on board)
14. Environmental media impacted or potentially impacted by spill (i.e. air, water, ground/soil)
15. Weather/Sea Conditions
16. Point of contact (i.e. Responsible Party name, phone address)
17. Vessel/facility agent(s) (i.e. name and phone)

18. Name and contact information of insurance carrier

19. Number and type of injuries or fatalities

20. Description of who is on-scene and what response activities are being done or have been completed.

21. Have evacuations occurred?

22. Other Agencies Notified.

1000 Introduction

1100 Introduction/Authority

Multi-agency (public agencies, nongovernmental organizations, industry, and general public) and multi-discipline responses are the norm in today's environment. The ability of local responders to conduct multi-agency response operations is absolutely essential to minimizing loss of life and damage to the environment, and to protecting property.

Pursuant to the National Contingency Plan (NCP; 40 CFR Part 300), Area Committees have been established for each area of the United States that has been designated by the President. The Area Committees are comprised of personnel from Federal and State agencies that coordinate response actions with tribal and local governments and with the private sector. Area Committees, under the coordinated direction of the Federal On-Scene Coordinators (FOSC), are responsible for developing Area Contingency Plans (ACP) for their respective designated areas. Area Committees are also required to work with the response community to develop procedures to expedite decisions for the use of alternative response measures.

The NCP also establishes the National Response Team (NRT) and 13 Regional Response Teams (RRT) who are responsible for the national and regional planning and preparedness activities before a response action and support the FOSC and State On-Scene Coordinator (SOSC) when activated during a response. RRT membership consists of designated representatives from key federal response and support agencies together with affected states.

1100.1 U.S. Coast Guard

Executive Order 12777 of 22 October 1991 designated responsibilities for the Commandant of the U.S. Coast Guard (through the Secretary of Homeland Security (DHS) for the coastal zone, and for the Administrator of the Environmental Protection Agency (EPA) for the inland zone. The term "coastal zone" is defined in the National Contingency Plan (NCP) (40 CFR 300.5) to mean all United States waters subject to the tide, United States waters of the Great Lakes, specified ports and harbors on inland rivers, and the waters of the Exclusive Economic Zone (EEZ). The Coast Guard has designated as areas, those portions of the Captain of the Port (COTP) zones, which are within the coastal zone, for which Area Committees will prepare Area Contingency Plans. The COTP zones are described in Coast Guard regulations (33 CFR 3.40-10). The U.S. Coast Guard has enforcement and investigative authority for a significant array of potential federal violations, as well as enforcement actions under applicable international treaties. Federal laws and regulations associated with a discharge (or substantial threat of a discharge) of oil include applicable components of the Clean Water Act as amended; the Oil Pollution Act of 1990; the Ports and Waterways Act; The Port

and Tanker Safety Act; The Act to Prevent Pollution from Ships (1980), as amended; and, Annex I of the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 (MARPOL 73/78). In addition, the Coast Guard has authority pursuant to 46 USC 7701 and 46 USC 6101 related to personnel actions (licensed mariners), and marine casualties, respectively. Federal regulations associated with investigative or enforcement interest under these United States Codes include, though are not limited to: applicable sections of 46 CFR with particular attention to 4, 5, 16; 33 CFR 126, 130, 151, 153-160; and 40 CFR 116, and 117. Potential federal enforcement actions associated with a pollution discharge may include, but are not limited to: the collection of statements and evidence to determine the causes of the associated marine casualty, mandatory chemical testing of involved licensed personnel, and the collection of oil samples in the water and on suspect vessels.

1100.2 U.S. Environmental Protection Agency

By statute, EPA is the pre-designated FOSC and Scientific Support Coordinators for inland spills of oil or discharges of hazardous materials. In most instances, EPA will not be the first responder on scene. EPA works in cooperation with other responders, but has delegated their authority of FOSC. In all spill situations, it is EPA's intent to contribute to the response by working with local, state, tribal authorities, general public, and Federal agencies to ensure the information needed to maximize the effectiveness of the response effort is easily accessible. During a response to a release, the potential responsible party (PRP), if known, available, and willing, is generally given the opportunity to adequately respond. The EPA works closely with PRPs when they are known and willing to take action to ensure the release reaches an adequate and rapid conclusion with a minimum impact on the environment. In the event of a release where the PRP is not identified, does not respond to contain or clean up the contamination, or does an inadequate job responding, EPA authority includes taking over the response or assuming a co-lead role in a unified command with state and local responders.

1100.3 Florida Department of Environmental Protection

Refer to: www.dep.state.fl.us/

1100.4 Alabama Department of Environmental Management

Refer to: <http://www.adem.state.al.us/default.cnt>

1100.5 Mississippi Department of Environmental Quality

Refer to: <http://www.deq.state.ms.us>

MOBILE MARINE INSPECTION AND CAPTAIN OF THE PORT ZONE'S

The following zone description can be found in Title 33 CFR Part 3.40-10:

The new Sector Mobile Inspection Zone, Captain of The Port Zone, and area of responsibility starts at the Florida coast at longitude 83 50'w; thence northerly to latitude 30 15'n, longitude 83 50'w; thence due west to latitude 30 15'n, longitude 84 45'w; thence due north to the southern bank of the Jim Woodruff reservoir at longitude 84 45'w; thence northeasterly along the eastern bank of the Jim Woodruff reservoir and northerly along the eastern bank of the Flint River to latitude 32 20'n, longitude 84 02'w; thence northwesterly to the intersection of the Georgia-Alabama border at latitude 32 53'n; thence northerly along the Georgia-Alabama border to the northern most point of Dekalb County, Alabama, thence westerly along the northern boundaries of Dekalb, Etowah, Blount, Cullman, Winston, Franklin Counties, Alabama to the Mississippi-Alabama border; thence north along the Mississippi-Alabama border to the northern boundary of Tishomingo County, Mississippi at the Mississippi-Tennessee border; thence west along the northern boundaries of Tishomingo, Alcorn, Tippah, Benton and Marshall Counties, Mississippi, thence southerly and westerly along the eastern and southern boundaries of Desoto, Tunica, Coahoma, Bolivar, Washington Counties, Mississippi; thence easterly along the northern boundary of Humphreys and Holmes Counties, Mississippi, thence southerly along the eastern and southern boundaries of Holmes, Yazoo, Warren, Claiborne, Jefferson Adams and Wilkinson Counties, Mississippi; thence due east along latitude 31 00'n from the southernmost intersection of Wilkinson and Amite Counties, Mississippi to the west bank of the Pearl River; thence southerly along the west bank of the Pearl River to longitude 89 31.8'w (at the mouth of the river); thence south along longitude 89 31.8'w to latitude 30 10'n; thence east along latitude 30 10'n to longitude 89 10'w; thence southeasterly to latitude 29 00'n, longitude 88 00'w; thence south along longitude 88 00'w to the outermost extent of the EEZ; thence easterly along the outermost extent of the EEZ to the intersection with a line bearing 199 t from the intersection of the Florida Coast at longitude 83 50'w; thence northeasterly along a line bearing 199 t from the Florida Coast at longitude 83 50'w to the coast.

Federal On Scene Coordinator (FOSC) responsibilities for Sector Mobile AOR are stated below in a Memorandum of Understanding with the EPA. MOU will be updated to reflect changes in Sector Mobile AOR boundary.

U.S. Coast Guard Captain of the Port (COTP), Mobile, Alabama will be the pre-designated OSC in the following areas within Region 4. When a roadway is used to delineate a boundary, that boundary shall be to, but shall not include, the roadway.

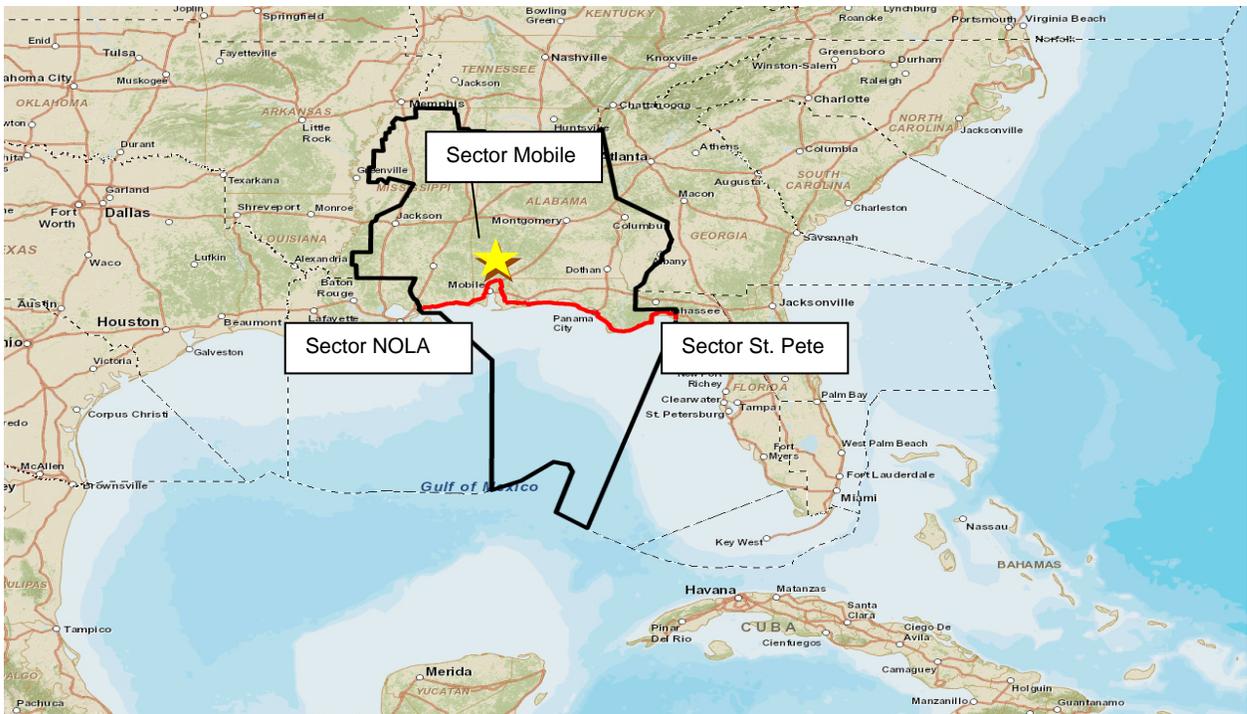
The Coastal Zone boundary begins at the intersection of the southern limit right of the Right-of-Way on US Highway 98 (US-98) with the COTP Mobile-COTP Tampa boundary (083-50 West Longitude). The intersection is twelve (12) miles west of Hampton Springs, FL on US-98. Then, westerly on US-98 to St. Marks, FL, then southwesterly along US-98 to the junction of the John Gorrie Memorial Bridge and the north shore of the Gulf Intracoastal Waterway (GICW) at Apalachicola, FL, including Ochlockonee Bay, East Bay, navigable portions of East and West Bayou, Blounts Bay, Shoal Bayou, and Alligator Bayou.

Then, continuing from the junction of the southern limit of the Right-of-Way at the John Gorrie Memorial Bridge and the north shore of the GICW to its intersection with Alabama State Highway 59 (AL-59). Responsibilities also include: East Bay, St. Andrews Bay, West Bay, Choctawhatchee Bay, Santa Rosa Sound, East Bay (Blackwater Bay), Escambia Bay, Pensacola Bay, Perdido Bay, and Wolf Bay.

Then, north on AL-59 to its intersection with Interstate 65 (I-65). Then, west and southwesterly along I-65 to its intersection with US Highway 90 (US-90) near Theodore, AL.

Then, westerly along US-90 to 89-10 W longitude (near Long Beach, MS); Thence south to the Mississippi coast, the boundary with COTP New Orleans.

Additionally all discharges or releases originating from waterfront facilities within the city limits of Panama City, Fort Walton Beach, and Pensacola, Florida; Mobile, Alabama; and Pascagoula, Biloxi, and Gulfport, Mississippi are the responsibility of the U.S. Coast Guard COTP Mobile as the pre-designated OSC.



The outlined Red area above is the approximate EPA/USCG OSC boundary line based on MOU with EPA region 4. The outlined dark line is an approximate Sector Mobile Captain of the Port Zone. Refer to <http://ocean.floridamarine.org/acp/MOBACP/StartHere.html>.

The following is the Sector Mobile Coastal Zone COTP description for the USCG OSC located in Federal Region 4:

Eighth Coast Guard District

Sector Mobile

U.S. Coast Guard Captain of the Port (COTP) Mobile, Alabama will be the pre-designated OSC in the following areas within EPA Region IV. When a roadway is used to delineate a boundary, that boundary shall be to, but shall not include, the roadway. From the intersection of the west coast of Florida with longitude 83 degrees 50 minutes west (near the mouth of the Fenholloway River) due north to US 98 (intersection of COTP St. Petersburg-COTP Mobile boundary at latitude 30 degrees 8 minutes 34 seconds north, longitude 83 degrees 50 minutes west); then west on US 98 to US 98A/State Hwy 30 (Panama City, FL); then northwest on US 98A/State Hwy 30 to US 98; then west on US 98 (not on US 98A near Panama City Beach, FL) to US 98 Bus (Pensacola, FL); then south and west on US 98 Bus to US 98; then west on US 98 to State Hwy 59 (Foley, AL); then north on State Hwy 59 (also called State Hwy 59S near Summerdale, AL) to I-65; then west and south on I-65 S to US 90; then south and west on US 90 to the COTP Mobile-COTP New Orleans boundary line, where the COTP boundary line proceeds south to the Gulf of Mexico.

Also included will be the Gulf Intracoastal Waterway (GICW); the Ochloekonee Bay; the East Bay near Apalachicola, FL; the East, North and West Bays near Panama City, FL; the St. Andrews Bay; the Choctawhatchee Bay; the East Bay near Pensacola, FL; the Pensacola Bay; the Blackwater Bay; the Escambia Bay; the Perdido Bay; the Back Bay of Biloxi, MS; and the St. Louis Bay. Not included will be any tributaries leading to a bay named in this section.

Mission Statement

Our mission is to ensure the highest state of readiness of the spill response community within our area of responsibility. We will strive to accomplish this by developing comprehensive and useful contingency plans, preparing the response community through training and exercises, developing coordination mechanisms to facilitate effective responses, and educating our stakeholders and the public.

Vision Statement

We will function as an efficient organization for ensuring effective response to environmental threats in our Area. Our regulatory members and non-regulatory

participants will include all stakeholders representing the federal, state, and local levels and the maritime, natural resource and academic communities.

We will collaborate, sharing information and resources, to produce the best possible plans and creative solutions to problems. We will employ state of the art research and technology in both our problem solving and our decision-making.

We will learn from our responses and activities, improve our processes and develop as individuals and as an organization. We will be proud of our accomplishments and make great contributions toward the environmental protection of the Alabama, Mississippi and Northwest Florida coastal areas.

1310 AC Purpose

The Area Committee is a spill preparedness and planning body made up of federal, state, and local agency representatives. Each area committee, under the direction of the FOSC for the area, is responsible for developing an ACP which, when implemented in conjunction with the NCP, will be adequate to remove a worst case discharge of oil or a hazardous substance and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility operating in or near the geographic area.

Each area committee is also responsible for working with state and local officials to pre-plan for joint response efforts, including appropriate procedures for mechanical recovery, dispersant use, shoreline cleanup, protection of sensitive environmental areas, and protection, rescue, and rehabilitation of fisheries and wildlife. The area committee is also required to work with state and local officials to expedite decisions for the use of dispersants and other mitigating substances and devices.

This charter establishes the Alabama, Mississippi, Northwest Florida Committee pursuant to the Oil Pollution Act of 1990 (OPA90) and Alabama, Mississippi and Florida State law. OPA90 established Area Committees to serve as spill preparedness planning bodies responsible for developing strategies for coordinated responses to the discharge, or threat of discharge, of oil or hazardous substances, in pre-designated Inland and Coastal zones. This Area Committee was established to cover Alabama, Mississippi, and Northwest Florida coastal waters.

1320 AC Organization

The Alabama, Mississippi, Northwest Florida Area Committee is comprised of representatives from federal, state, and local governments as members and representatives from the marine industry as advisors.

Executive Steering Group (ESG) and Chairmanship: The ESG is the ultimate decision making body of the Area Committee and provides direction as appropriate. The ESG consists of the Federal On Scene Coordinator (FOSC) and the three State On Scene Coordinators/Incident Commanders. The Sector Commander of Sector Mobile, as pre-designated FOSC, shall be the Chairman of the ESG and Area Committee. The Deputy Commander of Sector Mobile shall each serve as Alternate Chairman. The appropriate State On-Scene Coordinators (SOSC) shall each serve as Vice Chairmen concerning their appropriate state. The Chairman shall conduct each meeting of the Area Committee and provide an opportunity for participation by each regulatory member, each non-regulatory participant, and any public attendees; ensure adherence to the agenda; maintain order; and review recommendations submitted to the ESG and Area Committee. In the absence of the Chairman, the Vice-Chairmen shall perform these duties.

Area Committee Members: The duties and responsibilities of the members of the Area Committee are to set goals, assign and monitor projects assigned to subcommittees and working groups, vote on issues, and represent all local, state, and federal government entities that participate in the Area Committee.

Area Committee Advisors: Advisors have been selected to allow non-regulatory participants in the Committee an opportunity to actively voice their concerns and comments. They provide comments to the Area Committee and Executive Steering Group. Each non-regulatory participant in the Committee is aligned in one of the Advisory Groups: Industry, OSRO, Natural Resources, Media, Volunteer, and Academia. The interest of the Advisors are conveyed to Area Committee and discussed at the meetings.

Area Coordinator Duties: Facilitate Area Committee meetings, record meeting minutes, draft meeting minutes for review by the Area Committee Chairman and distribution by the Coast Guard, prepare meeting agenda notices for distribution to the Area Committee members and advisors, and make notifications of date and time changes to meetings.

Subcommittees and Working Groups: These have been established to work on functional items pertaining to the Area Committee. They are specifically tasked to complete assigned projects, tasks, and goals that are developed by the ESG and Area Committee. The number of working groups can change as needed for the work projects established by the ESG and Area Committee.

Area Committee Members and Advisors selection: The ESG will select personnel to fill the Area Committee vacancies. In addition, the ESG will select Area Committee Members to fill the Chairmen positions of the Subcommittees. The Subcommittee Chairmen will select members or advisors to serve as Co-Directors of the Subcommittee's Work Groups.

Area Committee Meeting Frequency and Location: The Area Committee meets bi-annually, although special meetings may be called when needed. There will be a combination of open meetings, open to all members of the Area Committee and the general public and closed meetings, which only the Area Committee members and

advisors will attend. Meeting locations will be alternated around the COTP Mobile area in order to balance interests.

1330 Charter Members

Area Committee

Executive Steering Group (FOSC & SOSCs)
Members (Voting & Decision Making Body)
Advisors (Advise Members on Issues)

Subcommittees & Work Groups

Executive Steering Group

Chairman: Sector Commander, Sector Mobile
Alternate: Deputy Sector Commander, Sector Mobile
Vice Chairman: Alabama State On Scene Coordinator
Vice Chairman: Mississippi State On Scene Coordinator
Vice Chairman: Northwest Florida State On Scene Coordinator

Area Committee Members

Federal Government
USCG Sector Mobile
USCG Detached Duty Office Mobile
NOAA Scientific Support Coordinator
National Marine Fisheries Services
U. S. Fish and Wildlife Service

Environmental Protection Agency

Department of the Interior (National Park Service)
State Government
Alabama Department of Environmental Management*
Mississippi Department of Environmental Quality*
Florida Department of Environmental Protection*

Local Government

Mobile	County	EMA
Baldwin	County	EMA
Escambia	County	EMA
Santa Rosa	County	EMA
Okaloosa	County	EMA
Walton	County	EMA
Bay	County	EMA
Gulf	County	EMA
Franklin	County	EMA
Wakulla	County	EMA
Jefferson	County	EMA
Taylor	County	EMA
Harrison	County	EMA
Jackson	County	EMA
Hancock	County	EMA

Area Coordinator [Non-voting member]

USCG Eighth District Response Advisory Team (DRAT)

1400 National Response System

The National Response System (NRS) was developed to coordinate all government agencies with responsibility for environmental protection, in a focused response strategy for the immediate and effective clean up of oil or hazardous substance discharge. The NRS is a three tiered response and preparedness mechanism that supports the predestinated Federal On-scene Coordinator (FOSC) in coordinating national, regional, local government agencies, industry, and the responsible party during response. There are three levels of contingency plans under the national response system: The National Contingency Plan, Regional Contingency Plans, and Area Contingency Plans.

The NRS supports the responsibilities of the FOSC, under the direction of the Federal Water Pollution Control Act's federal removal authority. The FOSC plans and coordinates response strategy on scene, using the support of the National Response Team (NRT), Regional Response Team (RRT), Area Committees, and responsible parties as necessary, to supply trained personnel, equipment, and scientific support to complete an effective response to any oil or hazardous substance discharge.

The NRS is designed to support the FOSC and facilitate responses to a discharge or threatened discharge of oil or a hazardous substance. The NRS is used for all spills, including a Spill of National Significance (SONS). When appropriate, the NRS is

designed to incorporate a unified command and control support mechanism (unified command) consisting of the FOSC, the State's OSC, and the Responsible Party's Incident Commander. The unified command structure allows for a coordinated response effort that takes into account the Federal, State, local and responsible party concerns and interests when implementing the response strategy. A unified command establishes a forum for open, frank discussions on problems that must be addressed by all parties with primary responsibility for oil and hazardous substance discharge removal. A unified command helps to ensure a coordinated, effective response is carried out and the particular needs of all parties are taken into consideration. The FOSC has the ultimate authority in a response operation and will exert this authority only if the other members of the unified command are not present or are unable to reach consensus within a reasonable time frame. During hazardous substance release responses in which a local agency assumes a leading role, the local agency may assume one of the unified commander roles when a unified command is used. During responses to oil spills, local agencies are not usually involved in the Unified Command; however they provide agency representatives who interface with the command structure through a Liaison Officer or the State representative. When a Unified Command is used, a Joint Operations Center and Joint Information Bureau shall be established. The Joint Operations Center should be located near and convenient to the site of the discharge. All responders (Federal, State, local and private) should be incorporated into the FOSC's response organization at the appropriate level.

Plans serve to formalize and document activities to be undertaken in the event that a contingency occurs. Plans minimize confusion in emergent conditions by presenting information derived through a deliberate planning process. To ensure consistency in preparedness planning, and to allow effective utilization of assets within and between levels, preparedness activities are controlled by a hierarchy of directives. The National Response Framework (old Federal Response Plan) and National Contingency Plan (NCP) address the national response structure and identify requirements for regional and area preparedness development. Regional and Area contingency plans developed under the guidelines of the NCP, address preparedness through a process involving the Area Committee. Composed of federal, state and local governmental representatives, the Area Committee develops an Area Contingency Plan (ACP) for responses to oil discharges and hazardous substance releases within their geographic area. Vessel Response Plans (VRPs) and Facility Response Plans (FRPs), developed by owners and operators, are designed to be consistent with the applicable ACP. Figure 1410.1 depicts the relationship of these plans.

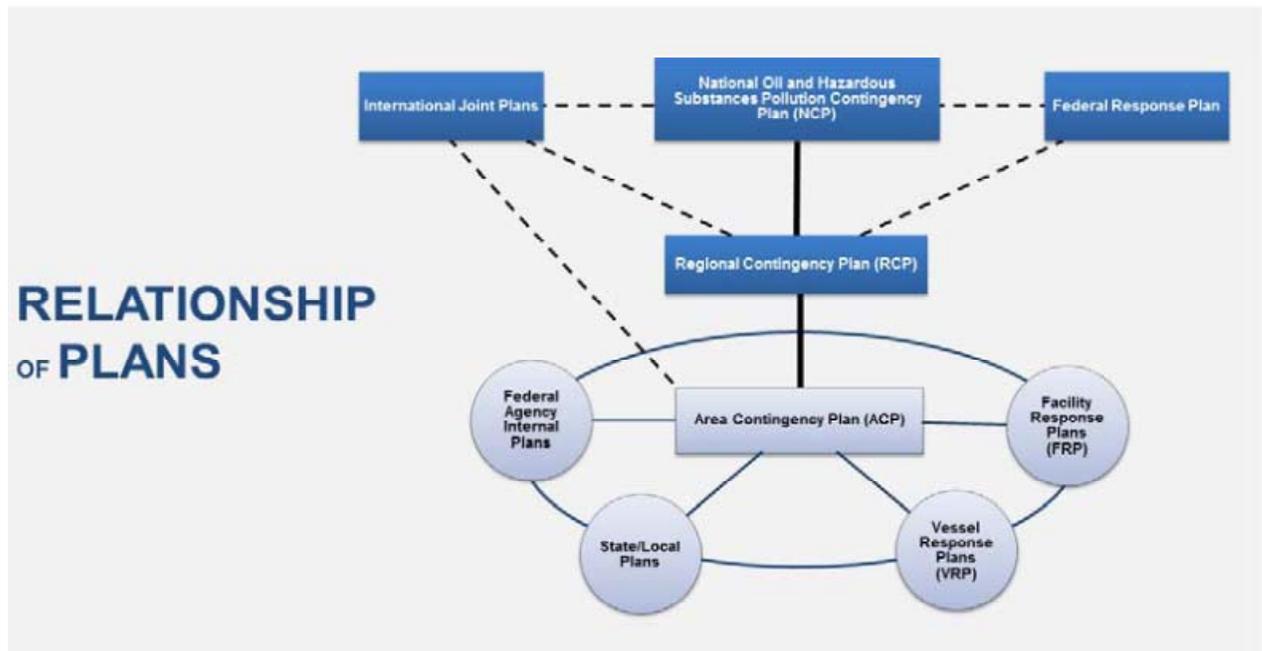


FIGURE 1410-1 Relationship of Plans

The United States Coast Guard (USCG) provides the National Response Team (NRT) vice-chair, co-chairs the RRTs, and serves as predesignated FOSC for the coastal zone, as described in 40 CFR 300.120 (a) (1). The USCG is tasked with responding to all oil and hazardous substance releases into, or threatens to go into, navigable waters within the coastal zone. Additionally, offers expertise in domestic and international fields of port safety and security, maritime law enforcement, ship navigation and construction, and the manning, operation, and safety of vessels and marine facilities.

The Environmental Protection Agency (EPA) vice-chairs the NRT and co-chairs the RRTs with the USCG and serves as predesignated FOSC for the inland zone, as described in 40 CFR 300.120 (a) (1). EPA provides expertise on environmental effects of oil discharges or releases of hazardous substances, pollutants, or contaminants, and environmental pollution control techniques.

The Federal Emergency Management Agency (FEMA): Provides guidance, policy, and program advice, technical assistance in hazardous materials, chemical and radiological emergency preparedness activities (including planning, training, and exercising). FEMA is a primary point of contact for administering financial and technical assistance to state and local governments to support their efforts to develop and maintain an effective emergency management and response capability. In the event of a declaration of a major disaster or emergency by the President, FEMA will activate the Federal Response Plan. The Federal Coordinating Officer, designated by the President, will implement the Federal Response Plan and coordinate and direct emergency assistance and disaster relief efforts. At a hazardous materials response site, FEMA's Federal Coordinating Officer

will coordinate all disaster or emergency actions with the FOSC. FEMA shall also provide relocation of residents and community facilities or temporary evacuation and housing of threatened individuals not otherwise provided for under Section 104 (a) of CERCLA.

Department of Defense (DOD): Plans and handles all spills and releases from any facility or vessel under DOD control. In addition, DOD may also, upon request of the FOSC, provide locally deployed U.S. Navy oil spill equipment and provide assistance to the FOSC. The following two branches of DOD have particularly relevant expertise.

The U.S. Navy is the federal agency most knowledgeable and experienced in ship salvage, shipboard damage control, and diving. The Superintendent of Salvage (SUPSALV) has an extensive array of specialized equipment and personnel available for use in these areas, as well as specialized containment, collection, and removal equipment specifically designed for salvage-related and open sea pollution incidents.

The U.S. Army Corps of Engineers (USACOE) has specialized equipment and personnel for maintaining navigation channels, removing navigation obstructions, accomplishing structural repairs, and performing maintenance to hydropower electric generating equipment.

Department of Energy (DOE): Generally provides advice and assistance for emergency actions essential for the control of immediate radiological hazards.

Department of Agriculture (DOA): Is the federal resource manager. Several agencies within this department may play an important role during certain spills.

1. Forest Service
2. Soil Conservation Service
3. Food and Safety Inspection Service
4. Animal and Plant Health Inspection Service

Department of Commerce (DOC): Through National Oceanographic Atmospheric Administration (NOAA), DOC has jurisdiction over and provides scientific support for response and contingency planning in coastal and marine areas, including assessment of

hazards that may be involved, predictions of movement and dispersion of oil and hazardous substances through trajectory modeling, and information on the sensitivity of coastal environments to oil and hazardous substances. NOAA provides expertise on and has jurisdiction over living marine resources and their habitats, including endangered species. NOAA also provides information on actual and predicted meteorological, hydrological, and oceanographic conditions for marine, coastal, and inland waters. NOAA is a federal trustee for living and non-living natural resources in coastal and marine areas.

Natural resources of concern to NOAA include:

1. All life stages, wherever they occur, of fishery resources of the EEZ and continental shelf,
2. Anadromous and catadromous species throughout their ranges, rivers and tributaries to rivers that historically or presently support anadromous species,
3. Federally “endangered” or “threatened” species including designated critical habitat and marine mammals for which NOAA has assigned responsibility,
4. Tidal wetlands, salt marshes, estuaries, and other important habitat supporting fishery and marine resources, and
5. Living and non-living resources of the National Marine Sanctuaries and National Estuarine Research Reserves.

Department of Health and Human Services (HHS): Provides health risk assessment support, including field response personnel. This support is provided through the Agency for Toxic Substances and Disease Registry (ATSDR). Their emergency response personnel are available 24 hours a day throughout the week to provide this support. Questions related to suspected acute overexposures can be addressed by the ATSDR in order to determine facilities which are properly staffed and equipped to evaluate such cases and to coordinate medical evaluation procedures with local health care facilities.

Department of the Interior (DOI): Of particular interest to community response organizations is DOI who has expertise on (and jurisdiction over) a variety of natural resources, federal lands, federal waters, certain aspects related to Native American lands, and certain jurisdictions related to United States territories. The following bureaus and offices have relevant expertise as listed.

1. Fish and Wildlife Service – anadromous and certain fish and wildlife, including endangered and threatened species; migratory birds; certain marine mammals; waters and wetlands; contaminants affecting habitat resources; and laboratory research facilities.

2. Geological Survey – geology, hydrology (ground water and surface water), and natural hazards.

3. Bureau of Indian Affairs – coordination of activities affecting Indian lands and assistance in identifying Indian tribal government officials.

4. Bureau of Land Management – minerals, soils, vegetation, wildlife, habitat, archaeology, wilderness, and hazardous materials.

5. The Bureau of Ocean Energy Management, Regulation, and Enforcement (BOEMER) formerly known as the Minerals Management Service_(MMS) is broken into two organizations;

NOTE:

BOEM is responsible for managing environmentally and economically responsible development of the nation's offshore resources. Its functions will include offshore leasing, resource evaluation, review and administration of oil and gas exploration and development plans, renewable energy development, National Environmental Policy Act (NEPA) analysis and environmental studies.

BSEE is responsible for safety and environmental oversight of offshore oil and gas operations, including permitting and inspections, of offshore oil and gas operations. Its functions include the development and enforcement of safety and environmental regulations, permitting offshore exploration, development and production, inspections, offshore regulatory programs, oil spill response and newly formed training and environmental compliance programs.

6. National Park Service – provides biological and general natural resources expert personnel at park units.

7. Bureau of Reclamation – operation and maintenance of water projects in the west, engineering, and hydrology.

Department of Justice (DOJ): Can provide expert advice on complicated legal questions arising from discharges or releases and federal agency responses. In addition, the DOJ represents the federal government in litigation relating to such discharges or releases.

Department of Labor (DOL): Through OSHA, DOL has authority to conduct safety and health inspections of hazardous waste sites to assure that employees are being protected and to determine if the site is in compliance with OSHA regulations. OSHA regulations related to spill response can be found in Title 29 CFR 1910.120 (Hazardous Waste Operator (HAZWOPER) regulations).

Department of Transportation (DOT): Provides response expertise pertaining to transportation of oil, or hazardous substances, by all modes of transportation. Through the Research and Special Programs Administration (RSPA), DOT offers expertise in the requirements for packaging, handling, and transporting regulated hazardous materials.

Department of State (DOS): Leads in development of international joint contingency plans. DOS will also help to coordinate an international response when discharges or releases cross international boundaries or involve foreign flag vessels. Additionally, DOS will coordinate requests for assistance from foreign governments and proposals from the United States for conducting research at incidents that occur in waters of other countries.

Nuclear Regulatory Commission (NRC): Responds as appropriate to releases of radioactive materials and is the key agency in dealing with radiological pollution.

General Service Administration (GSA): Plays an essential role in providing facility and related logistical support for the response organization.

Federal On-Scene Coordinator (FOSC): The NRS supports the responsibilities of the FOSC under the CWA's federal removal authority. The FOSC plans and coordinates response strategy on scene, using the support of the NRT, RRT, and responsible party, to supply the needed trained personnel, equipment and scientific support to complete an immediate and effective response to any oil or hazardous substance discharge. Unified Command (UC): The NRS is designated to support the FOSC and facilitate responses to a discharge or threatened discharge of oil or a hazardous substance. The NRS is used for all spills, including a Spill of National Significance (SONS). When appropriate, the NRS is designated to incorporate a UC and control support mechanism consisting of FOSC, SOS, and the RP's IC. The UC structure allows for a coordinated response effort, which takes into account the federal, state, local, and RP concerns and interests when implementing the response strategy. A UC establishes a forum for open, frank discussions on problems that must be addressed by the parties with primary responsibility for oil and not usually who interface with the command structure through the Liaison Officer (LNO) or the state representative. When a UC is used, the Joint Operations Center and Joint Information Center (JIC) is established. The Joint Operations Center should be located near and convenient to the site of the discharge. All responders (federal, state, local, and private) should be incorporated into the FOSC's response organization at the appropriate level.

Spill of National Significance (SONS): If a discharge occurs in the coastal zone and is classified as a substantial threat to the public health or welfare of the United States (40 CFR 300.320 (a)(2)), or the necessary response effort is so complex that it requires extraordinary coordination of federal, state, local, and responsible party resources to contain and clean up the discharge, the Commandant of the Coast Guard may classify the incident as a Spill of National Significance (SONS) under the National Oil and Hazardous

Substance Contingency Plan (NCP) 40 CFR 300.5. For more information on the SONS concept see COMDTINST M3121.15.

1410.1 Incident/Spill of National Significance

A Spill of National Significance (SONS) is defined as a spill which greatly exceeds the response capability at the local and regional levels and which, due to its size, location, and actual or potential for adverse impact on the environment is so complex, it requires extraordinary coordination to contain and clean up. Only the Commandant of the Coast Guard or the Administrator of the EPA can declare a SONS taking into account environmental risks, weather conditions, response capabilities, and the amount, or potential amount, of product spilled.

The response to a SONS event must be a coordinated response that integrates the OSCs response organization with the SONS response organization.

A Coast Guard Area or District Commander may recommend to the Commandant that a SONS be declared. Factors to be considered in declaring a SONS might include:

- Multiple OSC zones, districts, or international borders;
- Significant impact or threat to the public health and welfare, wildlife, economy and/or property over a broad geographic area;
- Protracted period of discharge and/or expected cleanup;
- Significant public concern and demand for action; and,
- The existence of, or the potential for, a high level of political and media interest.

A Spill of National Significance (SONS) classification provides additional support at the national level to the FOSC. Per 40 CFR 300.323 the Commandant for the Coast Guard holds the authority for declaring a SONS. Some or all of the conditions below will exist when classifying a spill a SONS:

A spill of size, magnitude and/or complexity that presents a significant challenge(s) to the Coast Guard FOSC and the RRT.

Local and regional resource coordination or the Unified Commands incident management capability is exceeded.

Unified Command resource coordination capability is exceeded

The pre-designated FOSC is requesting regional support from the Coast Guard District

The Regional Response Team (RRT) is supporting the pre-designated FOSC in accordance with the Regional Contingency Plan

The Coast Guard LANTAREA is coordinating requests for Coast Guard resources and support through Coast Guard PACAREA

The Coast Guard Office of Incident Management and Preparedness is coordinating with the National Response Team for interagency and international support.

Multiple unified incident command posts (ICPs) have been established

One or more Area Command(s) (UACs) has/have been established

Each UAC has established communication with regional level agencies, tribal, and territorial emergency and environmental response management personnel, and regional level non-governmental stakeholders to help establish response priorities

The UAC organization will already include the elements of the Coast Guard National Strike Force, RRT Co-Chairs, and the Coast Guard District Response Advisory Teams (DRATs).

The Coast Guard Commandant may choose to and has the authority to name a National Incident Commander (NIC) to assist the FOSC with interagency and governmental/public affairs coordination.

When an oil spill incident is an element of a larger response governed by a Stafford Act Presidential disaster declaration, it is unlikely that a SONS classification would be necessary. The national level response support will be coordinated by the Federal Emergency Support Function (ESF #10) within a Joint Field Office (JFO).

For more information regarding a SONS please refer to Coast Guard COMDTNIST 16465.1A

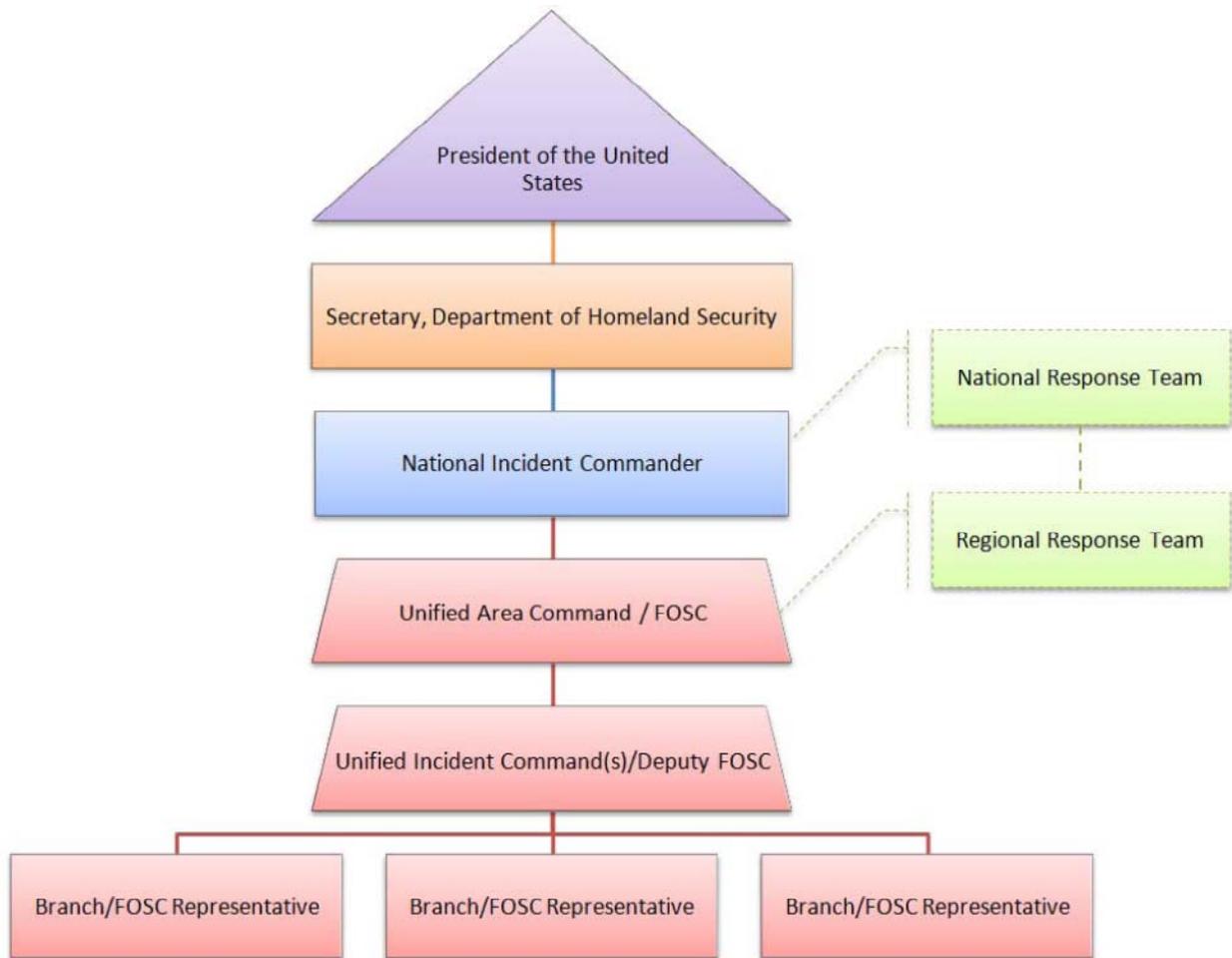


FIGURE 1410-2: SONS Response Organization

1410.2 National Response Team

The National Response Team (NRT) consists of 16 federal agencies with responsibilities, interests, and expertise in various aspects of emergency response to pollution incidents. The EPA serves as chair and the Coast Guard as vice-chair of the NRT, except when activated for a specific incident, when the lead agency representative serves as chair. The NRT is primarily a national planning, policy and coordination body and does not respond directly to incidents. The NRT provides policy guidance prior to an incident and assistance usually takes the form of technical advice, access to additional resources/equipment, or coordination with other RRTs. Additional NRT resources can be found at <http://www.nrt.org>.

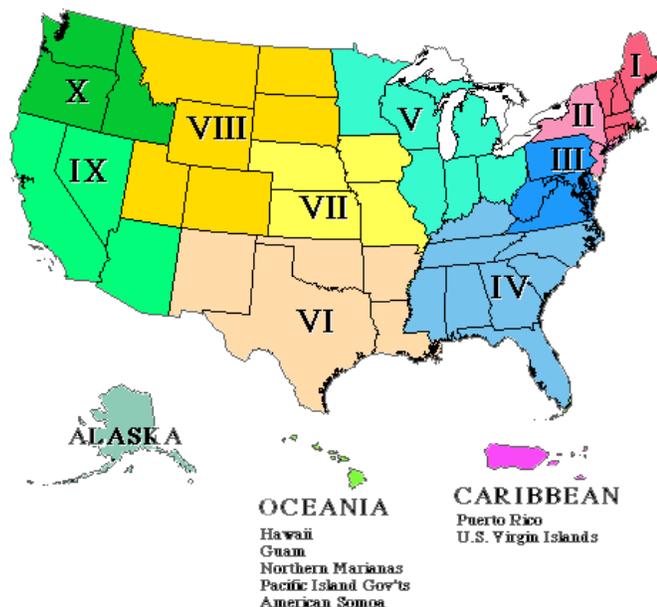


FIGURE 1410-3: National Response Team Membership

1420 Regional Response Team

There are 13 Regional Response Teams (RRTs), one for each of the ten federal regions and Alaska, the Caribbean, and the Pacific Basin. Each RRT has federal and state representation. EPA and the Coast Guard co-chair the RRTs. The RRTs are planning, policy, and coordinating bodies, and may be activated during a major incident to assist the FOSC with resources. The RRT also provides guidance support and approval for pursuing certain response strategies.

RRT Areas



RRTs may be activated for specific incidents when requested by the FOSC. If the assistance requested by a FOSC exceeds a RRT's capability, the RRT may request assistance from the National Response Team (NRT). During an incident the RRT may either be alerted by telephone or convened. The applicable RRT will be consulted by the FOSC on the approval/disapproval of the use of alternative response technologies (i.e. in-situ burning, dispersants, bio-remediation, and other chemical counter-measures) when that decision has not been pre-approved. The MOBACP geographical boundaries fall within the jurisdiction of RRT IV.

1430 RRT Structure

There are 13 RRTs, one for each of the ten federal regions and Alaska, the Caribbean and the Pacific Basin. Each RRT has Federal and State representation. EPA and the Coast Guard co-chair the RRTs. The MOACP encompasses Coast Guard FOSC areas of responsibility within RRT IV. Like the NRT, RRTs are planning, policy and coordinating bodies, and do not respond directly to incidents. The RRTs develop Regional Contingency Plans for their regions. These plans address region specific issues and provide guidance to the OSCs for developing their area plans. The RRTs also provide one level of review for the Area Contingency Plans. The RRTs may be activated for specific incidents when requested by the OSC. If the assistance requested by an OSC exceeds an RRT's capability, the RRT may request assistance from the NRT. During an incident the RRT may either be alerted by telephone or convened. The cognizant RRTs will also be consulted by the OSC on the approval/disapproval of the use of chemical countermeasures when that decision has not been pre-approved.

1430.1 Region Response Team IV

It is the policy of RRT 4 that the responding OSC(s) will, when appropriate, integrate into an existing ICS if consistent with requirements of the Regional Contingency Plan and when directing response under the National Response System, provide for meaningful participation of the local, state, and tribal responders and the Responsible Party by establishing a unified command system

It is the policy of the RRT 4 that response actions on non-Federal lands should be monitored or implemented by the most immediate level of government with authority and capability to conduct such activities. In the inland zone, the initial response is typically implemented by local government first responders (fire, law enforcement, emergency management agencies). The RRT 4 recognizes that local government is a key emergency response mechanism to protect public health and the environment for most emergencies under the NRS. They are usually the first to arrive at the scene and take immediate actions under their specific authorities to issue evacuation or shelter-in-place orders, initiate fire and law enforcement actions and care for casualties. Local responders are familiar with and will likely establish an incident command system.

1430.2 Regional Response Team IV Structure and Standing Membership

RRT Co-Chairs

U.S. Coast Guard, District 7

U.S. Environmental Protection Agency, Region IV

Federal On-Scene Coordinators (FOSC)

The FOSC is a federal official, pre-designated by EPA for inland areas and by the USCG for coastal or major navigable waterways. These individuals coordinate all federal containment, removal, disposal efforts, and resources during an incident. The FOSC also coordinates federal efforts with the local community's response. Anyone responsible for reporting releases should be aware of which FOSC has responsibility for the affected area. For locations near the coast or a major waterway, there may be both a Coast Guard and EPA FOSC with assigned responsibilities within jurisdictional boundaries of various state or local entities.

Inland Areas - Environmental Protection Agency, Region IV (located in Mobile AL, West Palm Beach FL, Atlanta GA, Louisville KY and Jackson TN)

Coastal Areas - U.S. Coast Guard, Sector Miami, Sector Charleston, Sector Jacksonville, Sector St. Petersburg, Sector North Carolina, Sector Mobile, Sector New Orleans, Sector Ohio Valley, Sector Hampton Roads, Sector Key West

Federal RRT Representatives

Environmental Protection Agency
USCG, District 5, District 7, District 8 (Department of Homeland Security)
Department of Agriculture
Department of Defense (U.S. Navy, U.S. Army Corps of Engineers)
Department of Energy
Federal Emergency Management Agency
General Services Administration
Dept of Health and Human Service (Center for Disease Control)
Department of the Interior
Department of Justice
Department of Commerce (NOAA)
Nuclear Regulatory Commission
Department of State
Department of Treasury
Department of Transportation
Department of Labor (OSHA)
Tennessee Valley Authority

State Representatives

State of Alabama, Department of Emergency Management
State of Florida, Department of Environmental Protection
State of Georgia, Department of Natural Resources, Environmental Protection Div
State of Kentucky, Department of Environmental Protection
State of Mississippi, Department of Environmental Quality
State of North Carolina, Department of Environment and Natural Resources
State of South Carolina, Department of Health and Environmental Control
Commonwealth of Tennessee, Division of Water Pollution Control

Associated Membership

Poarch Creek Tribe (Alabama)

Seminole Tribe (Florida)

Miccosukee Tribe (Florida)

Choctaw Tribe (Mississippi)

Cherokee Tribe (North Carolina)

Catawba Tribe (South Carolina)

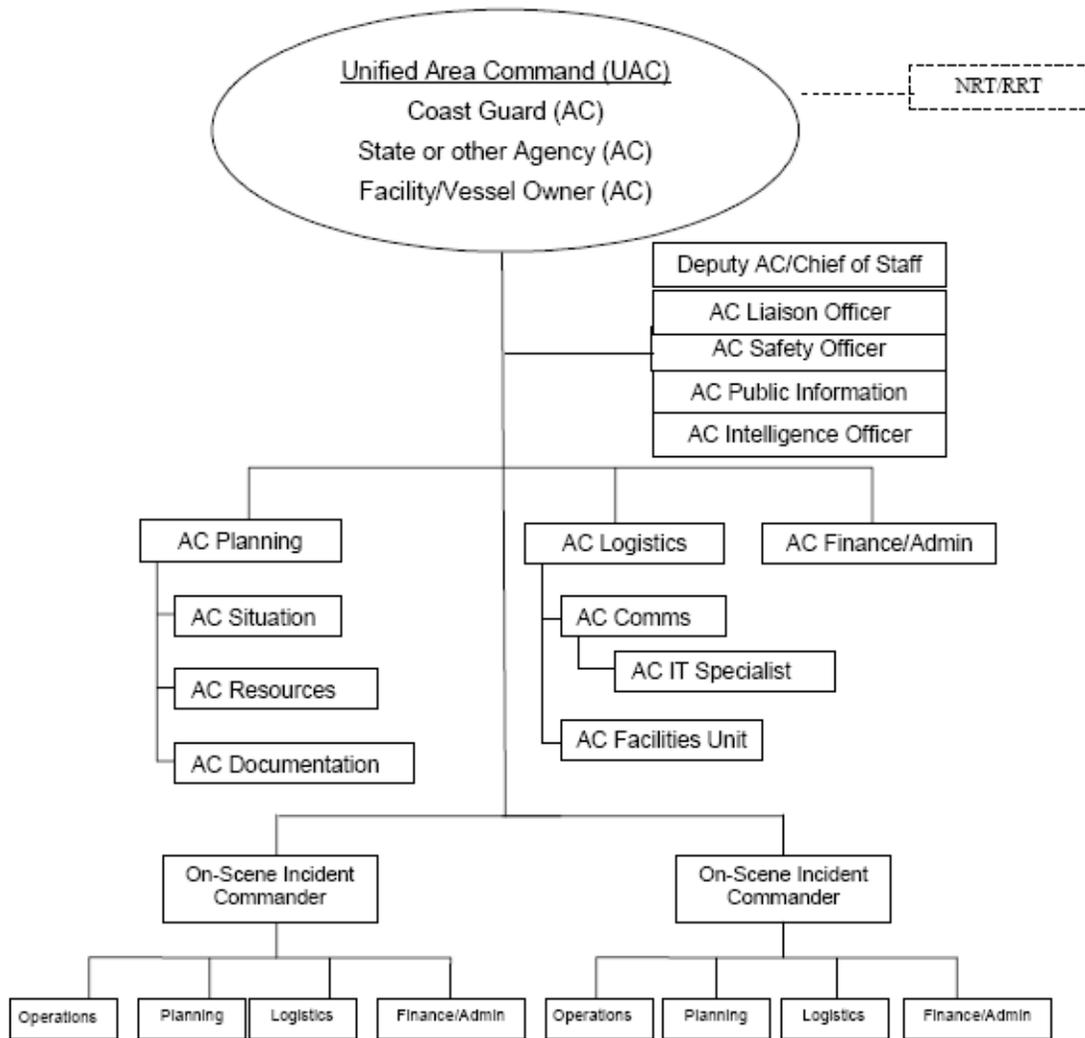
1440 Area Response Structure

An Area Command is established when the complexity of the incident and incident management span-of-control considerations so dictate. Generally, the administrator(s) of the agency having jurisdictional responsibility for the incident makes the decision to establish an Area Command.

The purpose of an Area Command is either to oversee the management of multiple incidents that are each being handled by a separate ICS organization or to oversee the management of a very large or complex incident that has multiple incident management teams engaged.

This type of command is generally used when there are a number of incidents in the same area and of the same type, such as two or more oil spills. These are usually the kinds of incidents that may compete for the same resources. When incidents are of different types and/or do not have similar resource demands, they are usually handled as separate incidents or are coordinated through an EOC. If the incidents under the authority of the Area Command span multiple jurisdictions, a Unified Area Command should be established. This allows each jurisdiction involved to have appropriate representation in the Area Command.

The structure of the Area Command follows standard ICS organization except there is no operations section. An example is provided below:



The Mobile Area Committee member agencies will manage spill incidents according to the following principles;

- **Incident Command System** The signatory agencies will use the National Incident Management System (NIMS) model Incident Command System (ICS);
- **Unified Incident Command** When more than one of the signatory agencies arrive on-scene to participate in managing a response action, the agencies will utilize a unified command structure to jointly manage the spill incident. In the Unified Incident Command (UC). Whenever possible, decisions with regards to the response will be made by consensus and documented through a single Incident Action Plan (IAP). When a consensus cannot be reached, the FOSC has the ultimate decision-making authority.

Members of the Unified Command shall have jurisdiction over the incident, capability to respond, and on-scene decision making authority.

- **Unified Area Command** For a very large single incident or multiple, simultaneous incidents involving a large number of resources and/or impacting a large geographical area, a Unified Command may be established. The Unified Area Command has the responsibility to: set overall incident-related objectives and priorities, allocate critical resources based on those priorities, ensure the incident/incidents are properly managed, and ensure that incident objectives are met and do not conflict with each other. The Unified Area Command has overall responsibility for setting response priorities and objectives, which are then carried out by field ICS/UC organization(s);
- **Tribal and Local Government On Scene Coordinators** The Unified command may incorporate additional tribal or local government on scene coordinator into the command structure as appropriate;
- **Responsible Party Command Structure** The person or persons responsible for a spill incident shall utilize an incident command system, which is capable of rapidly, and readily integrating into the NIMS based ICS/US organization utilized by the MOBACP signatory agencies;
- **Response Plan Approval** The National Oil and Hazardous Substance Contingency Plan (NCP, 40 CFR Part 300) requires that vessel, onshore facility, offshore facility, and pipeline response plans be compatible with the applicable Area Plan. Therefore, it is the policy of the Area Committee that vessel and facility contingency plans be consistent with the MOBACP.

1440.1 Federal/State Role in Incident Response

A basic premise of the ACP is that incidents are generally handled at the lowest jurisdictional level possible. Police, fire, public health and medical, emergency management, and other personnel are responsible for incident management at the local level.

In some instances, a Federal agency in the local area may act as a first responder and may provide direction or assistance consistent with its specific statutory authorities and responsibilities. In the vast majority of incidents, State and local resources and interstate mutual aid normally provide the first line of emergency response and incident management support.

When an incident or potential incident is of such severity, magnitude, and/or complexity that it is considered an Incident of National Significance according to the criteria established in National Response Plan, the Secretary of Homeland Security, in coordination with other Federal departments and agencies, initiates actions to prevent, prepare for, respond to, and recover from the incident.

These actions are taken in conjunction with State, local, tribal, non-governmental, and private-sector entities as appropriate to the threat or incident. In the context of Stafford Act disasters or emergencies, DHS coordinates supplemental Federal assistance when the consequences of the incident exceed State, local, or tribal capabilities.

1440.2 Federal On-Scene Coordinator

USCG Sector Mobile maintains and manages emergency response teams for response to discharges of oil and releases of hazardous substances in the coastal zone. These teams vary in size based on the nature of the incident. In all cases, they are tasked with assessing the discharge to determine response measures, monitor and supervise pollution countermeasures, document all phases of the response, conduct investigations to determine source, determine cause and responsible party, initiate enforcement actions, and act for the FOSC as an on-scene representative or until their arrival. Additional responsibilities include ensuring containment cleanup and disposal are carried out adequately, notification of all Natural Resource Trustees, and coordination of activities with federal, state, tribal, and local agencies.

The EPA Emergency Response Program consists of emergency response FOSCs located in the region 4, but they may respond to any location throughout the region, or throughout the country, as needed. The FOSCs are responsible for determining the source, cause, and responsible party, as well as initiating source control and enforcement actions as appropriate. Additional responsibilities include ensuring containment cleanup and disposal are carried out adequately, notification of all Natural Resource Trustees, and coordination of activities with federal, state, tribal, and local agencies. EPA also has access to technical assistance contractors who can provide technical oversight and other resources at spill and uncontrolled hazardous waste sites. In some cases, EPA's technical assistance contractor may arrive on scene prior to the FOSC. Prior to the arrival of the EPA OSC, the EPA contractor will cooperate with on-site agencies but will take direction through the EPA OSC only.

1440.3 State of Alabama Response Structure

Alabama Department of Environmental Management (ADEM) The state of Alabama's Emergency Operations Plan outlines responsibilities for oil and hazmat responses. The ADEM is designated as the lead state agency and coordinator of state response activities involving hazardous materials and is tasked with facilitating efficient response to discharges and releases of hazardous materials by placing human, financial, and material resources into action in the impacted area(s). The ADEM provides State On-Scene Coordinators to act as technical advisors in identifying and directing containment, treatment and removal of oil or hazardous materials threatening or affecting land, water, or air quality. The SOSCs carry out their responsibilities to coordinate, integrate, and manage the State's efforts to direct, identify, contain, cleanup, dispose of, or minimize releases of oil or hazardous substances or prevent, mitigate, or minimize the threat of potential releases. The ADEM also coordinates closely with the Region IV Regional Response Team on an as needed basis, e.g. when contemplating the use of chemical dispersants in combating an oil or hazmat incident in the state. The Alabama EOP's stated goals for response to hazardous materials incidents include 1) creating a State response that provides for the command, control, and coordination of hazardous material response operations and mutual aid, 2) coordinating the dispatch and use of State hazardous material resources and provide the means of coordination with Federal and local government, 3) providing a system for the receipt and dissemination of information, data, and directives pertaining to response activities among organizations responsible for hazardous materials incident response, and 4) collecting and disseminating information and intelligence relating to hazardous materials incidents.

1440.4 State of Mississippi Response Structure

Mississippi Department of Environmental Quality (MSDEQ)

MSDEQ, as directed by Title 49 of the Mississippi Code, is the lead state agency for response to oil discharges or hazardous substance releases. The Office of Pollution control, a department within MSDEQ, has various responsibilities during a pollution incident. The Office of Pollution Control's duties include spill notification, initial response actions, evacuations, cleanup activities, and waste disposal. The Office of Pollution Control can also obtain pollution cleanup funding from the State Pollution Abatement Fund.

1440.5 State of Florida Response Structure

Florida Department of Environmental Protection (FDEP)

Personnel from the FDEP Bureau of Emergency Response (BER) serve as State On-Scene Coordinators for oil and hazardous material incidents occurring anywhere within Florida, including coastal waters that extend nine miles from the coast in the Gulf of Mexico.

1440.6 Local Response Structure

The local response structure consists of the agencies below the state level, including counties and cities. When their representatives respond to an oil spill they should coordinate their activities through the Liaison Officer in an ICS response. The local response structure consists of the agencies below the state level, including counties, cities, etc. When a local jurisdiction holds interest in an incident they may be represented by the Liaison Officer, in the command staff, or may have response personnel integrate into position in the general staff. In larger incidents local jurisdictions may be incorporated as branch directors.

1440.7 Industry Response Plans/Worst Case Discharges

The Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of oil spill response plans by the owners or operators of certain facilities and vessels. It also requires that the vessel or facility be operated in compliance with its submitted response plan. Failure to have submitted a response plan, and to have received approval of that plan, results in the prohibition of that vessel or facility from the handling, storing, or transporting of oil.

A major feature of the OPA90 spill response plans is the requirement for vessel and facility owners and operators to identify and ensure the availability of, by contract or other approved means, personnel and equipment necessary to remove the “worst case discharge” to the “maximum extent practicable”.

Section 9440.1, contains planning scenarios for the Worst Case Discharges within the MOBACP boundaries.

1440.7.1 Off-Shore Facility Oil Spill Response Plan

Owners and/or Operators of an oil handling, storage, or transportation facility, and is located seaward of the coast line, must submit a spill-response plan to BSEE for approval. The spill-response plan must demonstrate that the owner/operator can respond quickly and effectively whenever oil is discharged from their facility. The requirements for Off-shore Oil Spill Response Plans can be found in 30 CFR Part 254.

1440.7.2 On-Shore Facility Response Plans

33 CFR Part 154 requires that the owner or operator of a “substantial harm” or “significant and substantial harm” facility, as defined in 33 CFR Part 155, submit a Facility Response Plan (FRP) to the local Captain of the Port. Section 4202(b)(4)(B) of

OPA 90 precludes a facility from handling, storing, or transporting oil unless a FRP has been submitted to the Coast Guard. For all marine transportation-related facilities, reviews and approvals will be done by the local Coast Guard Captain of the Port. Information contained in the FRPs is based upon national planning standards and the response scenarios are intended to be used to develop a planning document and not establish a performance document of standard.

1440.7.3 Vessel Response Plans

Due to the transitory nature of vessel operations, all Vessel Response Plans (VRPs) are reviewed at the national level. Information contained in the VRPs is based upon national planning standards and the response scenarios are intended to be used to develop a planning document and not establish a performance document of standard.

UC/ICs can utilize these plans to assist with a response to a Tank or Non-tank vessel. The following information should be available in a VRP.

- Tank Diagrams

- Emergency Contacts

- Contracted Response Resources

- Salvage and Marine Firefighting Plan

- Emergency Lightering Procedures

1440.7.4 Tank Vessel Response Plans

Vessel Response Plans (VRPs) are required for all Tank Vessels that are constructed or adapted to carry oil in bulk as cargo or cargo residue except: vessels exempted in 33 CFR Part 155.1015 and fishing and fish tender vessels of not more than 750 gross tons when engages only in the fishing industry. The requirements for these plans can be found in 33 CFR Part 155 Subpart D.

1440.7.5 Non-Tank Vessel Response Plans

On August 9, 2004, the President signed the Coast Guard Maritime Transportation Act of 2004 (CGMTA 2004). Section 701(a) and (b) of the CGMTS amend sections 311(a) and (j) of the FWPCA to require the Coast Guard to issue regulations that require an owner or operator of a non-tank vessel to prepare and submit to the Coast Guard a plan for

responding to the maximum extent practicable to a worst case discharge, of oil, and to a substantial threat of such discharge.

NVIC 01-05, Change 1 provides voluntary guidance to owners and operators of non-tank vessels for preparing and submitting plans for responding to a discharge or threat of a discharge of oil from their vessel and for receiving interim operating authorization from the Coast Guard.

1440.7.6 Shipboard Oil Pollution Emergency Plan (SOPEP)

The Act to Prevent Pollution from Ships was amended to incorporate the requirements regarding Shipboard Oil Pollution Emergency Plan (SOPEPs) of Annex I of the International Convention for the Prevention of Pollution from Ships 1973, as modified by the Protocol of 1978, as amended (MARPOL 73/78).

SOPEPs are required to be carried on board all oceangoing oil tankers of 150 gross tons and above and all other vessels of 400 gross tons and above. SOPEPs are required to be reviewed and approved by the vessel's flag state (country) administration. For U.S. flag vessels 33 CFR Part 151.27 requires that the Coast Guard and approve the plan. To provide consistency the review of SOPEPs, all plans will be reviewed nationally by the Coast Guard.

The purpose of a SOPEP is different than that of the vessel and facility response plans mandated by OPA 90. A SOPEP provides guidance to the ship's master and officers with respect to the onboard emergency procedures followed when a pollution incident has occurred or is likely to occur. These plans will often be in a checklist type format.

1440.7.7 Pipeline Response Plans

Owners and/or Operators of an onshore oil pipeline, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on the a navigable waterway of the United States or adjoining shoreline must poses a Oil Spill Response Plan. The requirements for Pipeline Oil Spill Response Plans can be found in 49 CFR Part 194.

Pipeline Response Plan is under development by Sector Planning and will be addressed with Pipeline Workgroup in CY14.

See Section 94410.1 for Well Containment information.

1440.8 National Responsible Party Policy

Under the FWPCA as amended by OPA 90, the responsible party has primary responsibility for cleanup of a discharge. Per FWPCA Section 311 and OPA90 Section 4201, an owner or operator of a tank vessel or facility participating in removal efforts shall act in accordance with the NCP and the applicable response plan. FWPCA Section 311(j)(5)(C) as implemented by OPA90 Section 4202 states that these response plans *SHALL*:

- Be consistent with the requirements of the National Contingency Plan and Area Contingency Plans;
- Identify the qualified individual having full authority to implement removal actions, and require immediate communications between that individual and the appropriate UC official and the persons providing personnel and equipment pursuant to this clause;
- Identify, and ensure by contract or other means approved by the President, the availability of private personnel and equipment necessary to remove to the maximum extent practicable a worst-case discharge (including a discharge resulting from fire or explosion), and to mitigate or prevent a substantial threat of such a discharge;
- Describe the training, equipment testing, periodic unannounced drills, and response actions of persons on the vessel or facility, to be carried out under the plan to ensure the safety of the vessel or facility and to mitigate or prevent a substantial threat of such a discharge;
- Be updated periodically; and
- Be resubmitted for approval of each significant change.

Each owner or operator of a tank vessel or facility required by OPA90 to submit a response plan shall do so in accordance with applicable regulations. Facility and tank vessel response plan regulations, including plan requirements for the Coastal Zone, are located in 33 CFR Parts 154 and 155, respectively; 30 CFR Part 254 for Off-shore facilities, and 49 CFR Part 194 for Pipeline. Facility response plan regulations for the inland zone are located in 40 CFR Part 112.

Each responsible party for a vessel or a facility from which oil is discharged, or which poses a substantial threat of a discharge, into or upon the navigable waters, adjoining shorelines or the Exclusive Economic Zone of the United States, is liable for the removal costs and damages specified in Subsection (b) of Section 1002 of OPA90. Any removal activity undertaken by a responsible party must be consistent with the provisions of the NCP, the Regional Contingency Plan (RCP), the Sector Mobile Area Contingency Plan

(MOBACP), and the applicable response plan required by OPA90. If directed by the Unified Command at any time during removal activities, the responsible party must act accordingly.

1440.8.1 Responsible Party Compliance Guidance

Specific responsibilities of the RP include, but are not limited to:

- Assessment of discharge or release;
- Establishment of a command post, in concurrence with the other On-Scene Coordinators (OSCs)
- Documentation/identification of type and quantity of oil or hazardous substance discharged or released;
- Containment of the oil or hazardous substance spilled or released and protection of the environment, with a particular emphasis on sensitive areas;
- Provisions of input relative to cleanup priorities (i.e. waste minimization)
- Timely and effective cleanup;
- Disposal of oil, oily waste, and Hazardous substances;
- Restoration of damaged environmental/natural resources;
- Communication with local, state, and federal response agencies and organizations;
- Communication with the media;
- Payment for damages;
- Steps to prevent reoccurrence of discharges or releases; and
- Wildlife collection and care in conjunction with responsible state, local, and federal agencies.

The RP has the opportunity to conduct damage assessments when required by the state/federal agencies and/or when appropriate given the RP's available resources as determined by the UC.

1440.8.2 Responsible Party Conformation with the MOBACP

The NCP requires that response plan holders “prepare and submit a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such discharge, of oil or a hazardous substance. These response plans are required to be consistent with the MOBACP.

The requirement for vessel, on-shore facility, offshore facility, and pipeline response plans to be consistent with the MOBACP applies to:

- Contingency Plan: content, review, and approval;
- The execution and evaluation of spill drills and exercises; and
- The management of spill response actions.

Failure to adequately conform to the MOBACP may result in: rejection of a spill contingency/response plan; non-credit for a drill; or federal and/or state agencies assuming direct control of a spill response action. However, it is also the policy of the MOBACP that the unified command will encourage the party responsible for a spill incident, to maintain the primary responsibility for managing the response action so long as they:

- Actively and cooperatively participate in the unified command structure;
- Provide an organization which is compatible with NIMS ICS;
- Provide regular communication and documentation that assures adequate response resources are bring rapidly mobilized in proportion to the size of the incident as discussed in the following section; and
- Follow their approved spill contingency/response plan (if applicable) unless otherwise directed, or a deviation is agreed to, by the unified command.

1440.8.3 Requirements for a full and rapid response

The MOBACP shall plan for an aggressive, timely, and efficient, early response to an incident to provide adequate equipment and trained personnel to effectively respond to the highest quantity of product that can be released. If it is determined that excessive response resources are ordered or mustered they may be canceled or demobilized to help control the cost of the response action to the responsible party and responding agencies.

In launching an aggressive, timely, and efficient response take the following into account:

It is often difficult to obtain precise information on the quantity of oil or hazardous material, which has actually been released and is likely to continue to be released until the source is controlled;

Notification may be delayed;

There is a tendency of some responsible parties to be very conservative in estimating the quantity of oil spilled due to liability considerations;

Miscommunication can occur as to the actual extent of personnel and equipment which has been ordered, and as to the time of arrival. Similarly, estimated are sometimes overly optimistic;

Response contractors may experience difficulty in mobilization in a timely fashion a portion of their response resources for various reasons; and

In some cases, state and federal on-scene coordinators are cautious in making sure responsible parties do not mobilize unnecessary resources, which would needlessly increase the cost of the response action.

However, adequate response resources must be rapidly mobilized if initial source control, containment, and cleanup efforts are to be successful. Spill response is more cost-effective and far less damaging to natural resources to contain a spill rather than to remove it from the water and beaches.

If the responsible party fails to respond in a manner deemed reasonably consistent with this policy and the MOBACP, the FOSC or SOSC may assume the lead for a portion or of the entire spill. The agency proposing to assume lead for the cleanup will closely coordinate with other members of the unified command prior to taking such action.

Another reason that rapid response and contamination is important is that, there are certain weaknesses in the response community's ability to mount a fully effective response. These weaknesses are:

Coastal Response. During certain times of the year, it is very difficult to mount an effective response action for spills in the outer coastal environment. Once equipment arrives on-scene in the coastal environment, sea state and meteorological conditions (such as fog, wind, and rain) may dramatically limit or terminate effective oil booming and on-water recovery efforts;

Response in Shallow Marine Embayments. Diversions and containment booming and intertidal shoreline cleanup is very difficult in many of the Mobile areas sensitive shallow marine estuaries. Once oil enters these intertidal areas, extensive environmental damage is likely and recovery technology has minimal effectiveness. In these environments, conventional shoreline clean-up activities themselves can cause extensive damage and are therefore seldom used; and

Response to Catastrophic Oil Spills Should a catastrophic oil spill occur, it is likely that there will not be adequate response resources in the Mobile area to manage and clean-up the spill. Therefore, the Mobile area will rely in part on mutual aid from Gulf Coast States, and other jurisdictions to provide much of the necessary response resources in the event of a catastrophic spill.

1450 Incident Command System

The U.S. Coast Guard Incident Management Handbook (IMH) is designed to assist Coast Guard personnel in the use of the Incident Command System (ICS) during response operations. The IMH is intended to be used as an easy reference job aid for responders. It is not a policy document, but rather guidance for response personnel. During development of the IMH, it was recognized that eighty-percent of all response operations share common principles, procedures and processes. The other twenty-percent of response operations are unique to the type of incident, such as a search and rescue case or an oil spill. The handbook is laid out so that the generic information applicable to all responses is presented up-front. For example, the duties and responsibilities of the Planning Section Chief (PSC) are found in the generic section since a PSC's job description under ICS does not change from one type of incident to another. The remainder of the IMH is divided into nine types of incidents the Coast Guard is most likely to respond to.

They are:

1. Terrorism
2. Maritime Security/Antiterrorism

3. Law Enforcement
4. Search and Rescue
5. Oil Spills
6. Hazardous Substance
7. Marine Fire
8. Multi-Casualty
9. Event Management

With the exception of the chapters on Terrorism, Maritime Security/Antiterrorism and Event Management (further development pending) each of the chapters that deal with a specific type of incident provides a scenario from which to illustrate how an incident starts off with only initial responders and then escalates to a large multi-agency response organization. The organization charts in each of the chapters are only **examples** of how an ICS organization may be developed to respond to that type of incident. Also, in each chapter are incident-specific job descriptions that have proven valuable in past response operations. An example of an incident-specific position would be the Vessel Disposition Group Supervisor located in the Law Enforcement chapter. Coast Guard response personnel can come from any component of the Coast Guard (Active Duty, Reserve, Auxiliary, or Civilian Employees). Responders should have a basic understanding of ICS to ensure they can effectively operate within the ICS organization and properly use and understand this IMH.

National Incident Management System (NIMS) ICS standard forms can be found on the Internet at: <http://www.uscg.mil/forms/ics.asp>

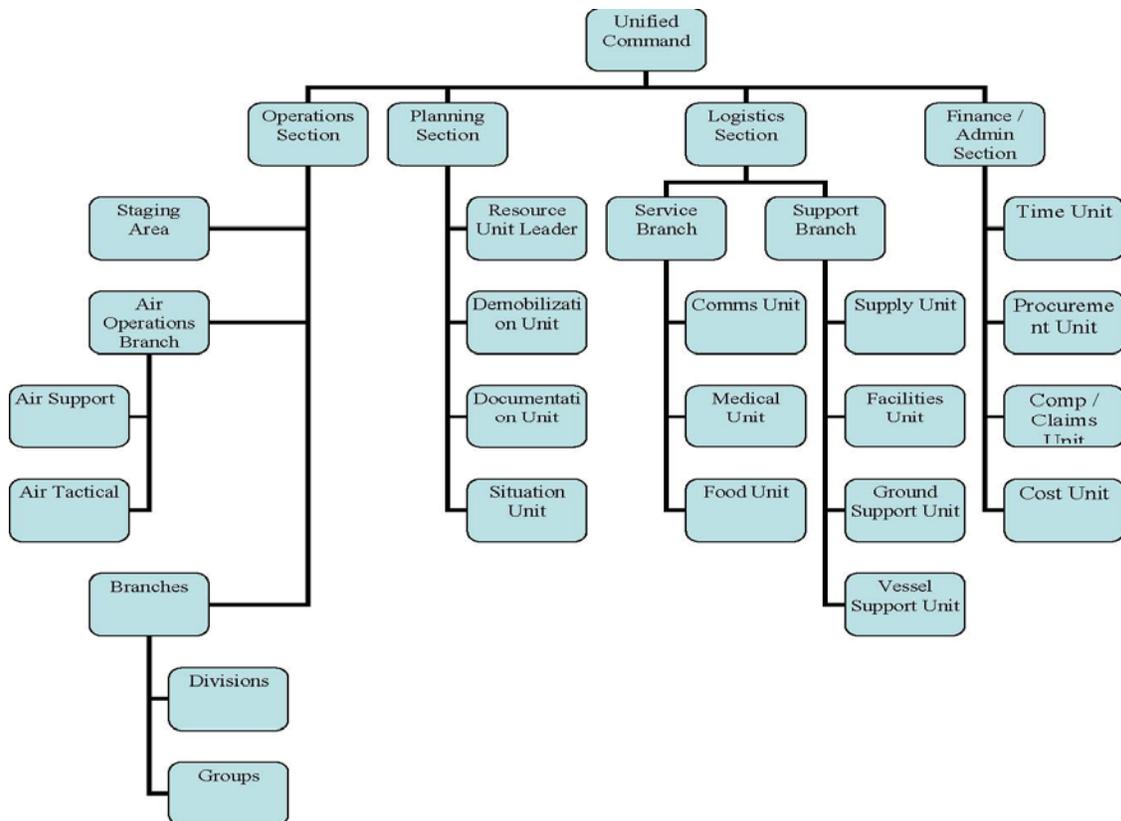


Figure 1450-1 Typical ICS Organization

1460 Area Exercise Mechanism

The FOOSC shall periodically conduct drills of removal capability, without prior notice, in areas for which ACPs are required. This action will allow effective assessments of such plans and relevant vessel, and facility response plans. These drills may include participation by federal, state, local agencies, owners and operators of vessels and facilities in the area, and private industry. The National Strike Force Coordination Center (NSFCC) will act as a clearinghouse for exercises, participating in the development, execution, and evaluation to the fullest extent practicable, with the cognizant program managers of the USCG and EPA. The NSFCC may, in conjunction with the cognizant program managers of the USCG and EPA, impose unannounced area or multi-area exercises. [NOTE: The NSFCC is responsible for executing the National Preparedness for Response Exercise Program (NPREP). All USCG participation in exercises will be coordinated with and/or through the NSFCC.]

1460.1 National Preparedness for Response Exercise Program (NPREP)

The National Preparedness for Response Exercise Program (NPREP) was developed to establish a workable exercise program which meets the intent of Section 4204(a) of OPA 90, amending Section 311 (j) of the FWPCA, by adding a new subsection (6) and a new subsection (7) for spill response preparedness.

The NPREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the government and oil industry to adopt and sustain. The NPREP is a unified federal effort and satisfies the exercise requirements of the Coast Guard, the EPA, the Pipeline and Hazardous Materials Safety Administration (PHMSA) Office of Pipeline Safety, and the Bureau of Safety and Environmental Enforcement (BSEE). Completion of the NPREP exercise will satisfy all OPA 90 mandated federal oil pollution response exercise requirements.

NPREP addresses the exercise requirements for oil pollution response. There are additional industry planning and exercise requirements contained in other federal statutes, which are not addressed in the NPREP Guidelines. The NPREP represents the minimum guidelines for ensuring adequate response preparedness. If personnel with an organization believe additional exercises or an expansion of the scope of the NPREP exercises are warranted to ensure enhanced preparedness, they are highly encouraged to conduct these exercises.

The NPREP exercise should be viewed as an opportunity for continuous improvement of the contingency/response plans and the response system. Plan holders are responsible for addressing any issue that arises from evaluation of the exercise and for making changes to the contingency/response plans necessary to ensure the highest level of preparedness.

1460.1.2 Participation in NPREP

Industry Plan holders are required to meet the pollution response exercise requirements mandated by the federal agency with regulatory oversight for the specific type of industry involved (e.g., vessel, marine transportation-related facilities, onshore and certain offshore non transportation-related facilities, pipelines, offshore facilities). The NPREP satisfies these requirements. The NPREP is a voluntary program. Plan holders are not required to follow the NPREP guidelines and, if they choose not to, may develop their own exercise program that complies with the regulatory exercise requirements. The NPREP guidelines can be found online at http://www.uscg.mil/hq/nsfweb/download/REP/REP_GLNS_Aug_02.pdf

Applicability

The NPREP is applicable to all industry response plan holders who elect to follow these guidelines.

Industry plan holders electing not to adopt the NPREP as their exercise program will be responsible for developing and documenting an exercise program that satisfies the appropriate federal oversight agency. If an industry plan holder has developed one response plan that covers a fleet of vessels or regional operations of offshore platforms, this plan holder would only be required to conduct one “set” of exercises for the plan, with the exception of the Qualified Individual notification exercises and the emergency

procedure exercises, which are required for all manned vessels and unmanned barges as specified in 33 CFR Part 155.1060

The Eighth Coast Guard District coordinates the NPREP. For detailed information on the NPREP, the National Preparedness for Response Exercise Program (NPREP) handbook can be found online at: <http://www.uscg.mil/hq/g-m/nmc/response/msprep.pdf>.

A three year NPREP Schedule for both the coastal and inland zones can be found on the National Strike Force Coordination Center (NSFCC) Webpage at: <http://www.uscg.mil/hq/nsfweb/nsfcc/prep/prepexerciseske05.html>.

1470 National Response Framework

In February 2003, the President of the U.S. issued Homeland Security Presidential Directive (HSPD)-5, Management of Domestic Incidents which directed the development of a new National Response Framework (NRF) (www.fema.gov/nrf) to align Federal coordination structures, capabilities, and resources into a unified, ***all-discipline, all hazard*** approach to domestic incident management. The NRF incorporates best practices from a wide variety of incident management disciplines to include fire, rescue, emergency management, law enforcement, public works, and emergency medical services. The NRF is built on the template of the National Incident Management System (NIMS), which provides a consistent doctrinal framework for incident management at all jurisdictional levels, regardless of the cause, size, or complexity of the incident. Most incidents will only involve one Incident Command Post; however the following discusses how a NIMS structure will expand to effectively manage larger or growing events.

NRF Coordination Structure

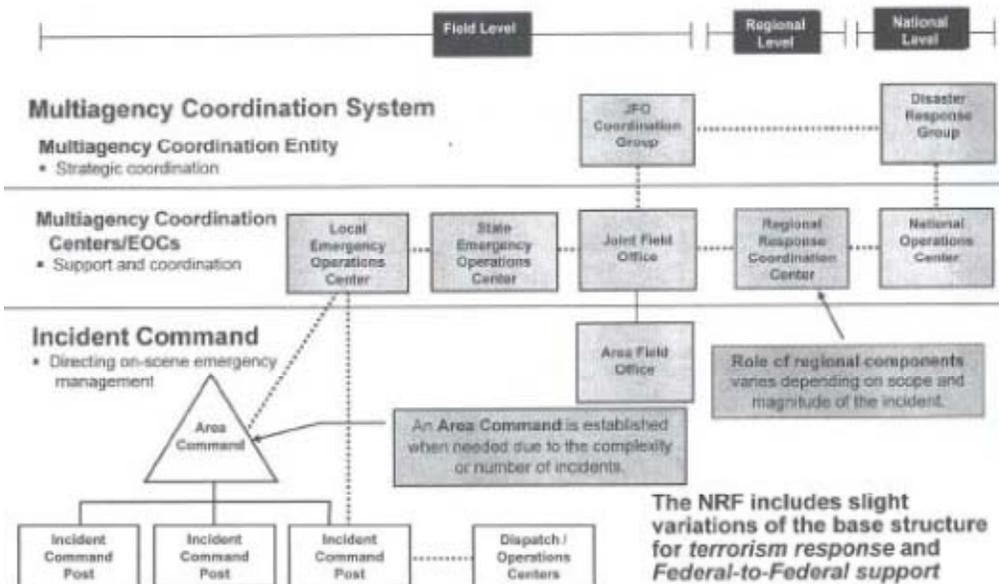


FIGURE 1440-1 National Response Framework Coordination Structure

Plans under the National Response Framework

The diagram below shows how the primary incident management and security plans support and relate to one another and ultimately support the NRF. The vast majority of incidents the Southeast Florida Area Committee manages are covered in existing plans under the NRF. Only when incidents rise to the level of an Incident of National Significance (INS) does the NRF come to bear. The key thing that must remain consistent within multi-agency plans like the Southeast Florida Area Contingency Plan and Area Maritime Security Plan is how they, and their NIMS management constructs (agencies that support response and security in our ports), are supported by the NRF for Incidents of National Significance.

The National Response Framework and NIMS documents may be accessed at

<http://www.fema.gov/emergency/nrf/mainindex.htm>

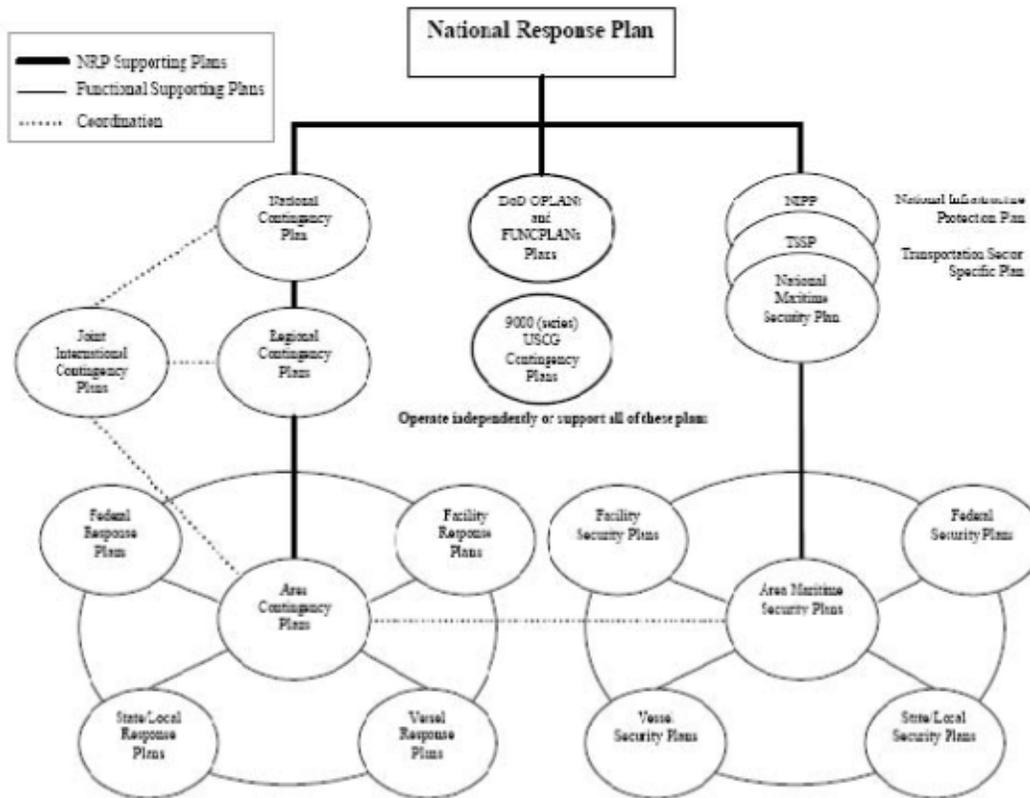


Figure 1470-1 NRF Organization

Note: Per Notice of Change of the National Response Plan to the National Response Framework the Interagency Incident Management Group is now the Unified Coordination Group and the Homeland Security Operations Center is not the National Operations Center.

Initial response to an act of terrorism from chemical warfare agents or radiological materials may not likely differ greatly from a response to other hazardous material incidents. Terrorism response for biological agents and explosives may differ significantly from typical hazardous materials incidents. It may be unclear at the initial on-set of a response whether the cause was accidental or an act of terrorism. Local responders will be the first to arrive on scene to assess the situation and possibly take initial response measures to contain or stop the release. A terrorist incident will always be treated as a crime scene and preservation of evidence is critical. Coordination is required between law enforcement who view the incident as a crime scene, and other first responders who view the incident as a hazardous materials problem or disaster site. Although protection of life remain paramount, the protection and processing of the crime scene is imperative so that perpetrators may be identified and apprehended

The responsibilities for response to a WMD incident lie with multiple agencies and the MOBAC should be prepared to provide resources under the National Response

Framework (NRF) during a response to a terrorist incident. It is possible that a major public health and environmental incident could be the result, perhaps the intent, of this type of incident. The MOBACP may be needed to address critical short-term issues while a larger response infrastructure is developed under the full National Response Framework. Parallel response actions by MOBAC member agencies may be on-going under the NRS prior to and during NRF activation.

1480 Nuclear/Radiological Incident Annex to the NRF

The Nuclear/Radiological Incident Annex (NRIA) to the NRF describes the policies, situations, concepts of operations, and responsibilities of the Federal departments and agencies governing immediate response and short-term recovery activities for incidents involving release of radioactive materials to address the consequences of the event. These incidents may occur on Federal-owned or –licensed facilities, privately owned property, urban centers, or other areas and may vary in severity from the small to the catastrophic. The incidents may result from inadvertent or deliberate acts. The NRIA applies to incidents where the nature and scope of the incident requires Federal response to supplement the State, Tribal, and/or Local incident response.

There is one active Nuclear Power Plant located within the Sector Mobile Captain of the Port Zone.

Joseph M. Farley Nuclear Electric Generating Plant



Located along the Chattahoochee River east of Dothan. The Joseph M. Farley Nuclear Generating Station is located near Dothan, Alabama in the southern United States. The twin-unit nuclear power station sits on a 1,850-acre (7.4 km²) site in Houston County, which is largely wooded and agricultural. Total nameplate generating capacity - 1,720,000 k.

1500 State/ Local Response System

1510 National Response Policy

The National Response Policy is to ensure that all applicable laws and regulations are carried out. Those laws and regulations are intended to ensure effective and immediate removal of a discharge/release, mitigation or prevention of a substantial threat of a discharge of oil or release of hazardous substances, and overall protection of human health and the environment.

1520 Coast Guard Policy

The Coast Guard will respond consistent with the policy outlined in the NCP and this Area Contingency Plan. The Coast Guard may elect not to dispatch representatives to reported discharges where representatives of another cognizant government agency are responding. However, if Federal removal is indicated within the coastal zone, the Coast Guard will respond. If the responsible party is conducting proper removal, the Coast Guard FOSC will use best judgment in determining the need for the presence of Coast Guard personnel on scene. In the event of a spill where there is no responsible party or their response efforts are inadequate, Coast Guard responsibilities may include assuming the response actions, partial response actions, or assuming a joint leadership in a unified command with state and local responders. General Coast Guard policy for pollution response is provided in Volume VI of the Coast Guard Marine Safety Manual.

1530 Environmental Protection Agency Policy

By statute, the EPA is the FOSC for inland spills of oil or hazardous substances. In most instances, EPA is not the first responder on scene. EPA works in cooperation with other responders, but has not delegated their responsibility as FOSC. In all spill situations, it is EPA's intent to contribute to the response by working with the local, state, tribal authorities, general public and Federal agencies to ensure the information needed to minimize the effectiveness of the response effort is easily accessible. During a response to a release, the potential responsible party (PRP), if known, available, and willing, are generally given the opportunity to adequately respond. The EPA works closely with PRPs when they are known and willing to take action to ensure that the release reaches and adequate and rapid conclusion with a minimum impact on the environment. In the event of a spill where the PRP is not identified, does not respond to contain or clean up the spill, or does an inadequate job responding, EPA responsibilities may include taking over the response or assuming a co-lead role in a unified command with state and local responders.

1540 Bureau of Safety and Environmental Enforcement

The Bureau of Safety and Environmental Enforcement (BSEE) is responsible for ensuring comprehensive oversight, safety, and environmental protection in all offshore

energy activities. BSEE handles safety and environmental enforcement functions including, but not limited to, the authority to inspect, investigate, summon witnesses and produce evidence, levy penalties, cancel or suspend activities, and oversee safety, response, and removal preparedness.

1550 Department of Defense and Department of Energy Policies

In the case of the Departments of Defense (DOD) or Department of Energy (DOE), when a response to a release or threat of release of a hazardous substance, pollutant, or contamination is on DOD or DOE property, or the sole source of the release is from any facility or vessel under the jurisdiction, custody, or control of DOD or DOE, those agencies shall provide FOSCs responsible for taking all response actions. DOD will be the removal response authority with respects to incidents involving DOD military weapons or munitions or weapons and munitions under the jurisdiction, custody, or control of the DOD.

1550.1 Department of Defense Facilities

See Section 9210.81 under the Personnel and Services Directory

1550.2 Department of Energy Regulated Facilities

See Section 9200 Personnel and Services Directory

1560 State Response System

For Florida Refer to the Florida Department of Environmental Protection
<http://www.dep.state.fl.us/>

For Alabama refer to the Alabama Department of Environmental Management
<http://www.adem.state.al.us/default.cnt>

For Mississippi refer to the Mississippi Department of Environmental Quality
<http://www.deq.state.ms.us/>

1570 Local Response System

Local Chief Executive

A mayor or city or county manager, as a jurisdiction's chief executive, is responsible for the public safety and welfare of the people of that jurisdiction. The Local Chief Executive Officer:

Is responsible for coordinating local resources to address the full spectrum of actions to prevent, prepare for, respond to, and recover from incidents involving all hazards including terrorism, natural disasters, accidents, and other contingencies;

Dependent upon State and local law, has extraordinary powers to suspend local laws and ordinances, such as to establish a curfew, direct evacuations, and, in coordination with the local health authority, to order a quarantine;

Provides leadership and plays a key role in communicating to the public, and in helping people, businesses, and organizations cope with the consequences of any type of domestic incident within the jurisdiction;

Negotiates and enters into mutual aid agreements with other jurisdictions to facilitate resource-sharing; and

Requests State and, if necessary, Federal assistance through the Governor of the State when the jurisdiction's capabilities have been exceeded or exhausted.

In the geographical area covered by this plan, the local response system is based on an informal incident command system. Due to the environmental sensitivity of a great portion of Sector Mobile's Area of Responsibility, and the number of state and local response entities who are required to report and investigate discharges of oil, a notification and response system based on the concept of cooperation and mutual assistance has been developed and implemented.

The primary organizations involved in response and in both monitoring and directing response efforts are U. S. Coast Guard Sector Mobile, local county environmental enforcement agencies as well as local fire departments. The exact nature of the event will dictate the degree of involvement by each organization.

For a maximum most probable or a worst case scenario, the Unified Command System will be utilized. Not all positions may be needed and several positions may be filled by one person.

In the event of a hazardous substance release, USCG Sector Mobile has supervisory/ advisory roles as a first responder. Each hazardous substance release must be treated on a

case by case basis as the released material, location, weather and amount of released material will drastically affect the FOSC's response. Local fire department HAZMAT teams will typically secure the incident until a commercial team arrives.

1600 National Policy & Doctrine

The Federal OSC to “in accordance with the National Contingency Plan and any appropriate Area Contingency Plan, ensure effective and immediate removal of a discharge, and mitigation or prevention of a substantial threat of a discharge, of oil or a hazardous substance – (i) into or on the navigable waters; (ii) on the adjoining shorelines to the navigable waters; (iii) into or on the waters of the exclusive economic zone; or (iv) that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States.” “In carrying out these functions, the OSC may: (i) remove or arrange for the removal of a discharge, and mitigate or prevent a substantial threat of a discharge, at any time; (ii) direct or monitor all Federal, State, and private actions to remove a discharge; and (iii) recommend to the Commandant that a vessel discharging or threatening to discharge, be removed and, if necessary, destroyed.” If the discharge or substantial threat of discharge of oil or hazardous substance is of such size or character as to be a substantial threat to the public health or welfare of the United States (including but not limited to fish, shellfish, wildlife, other natural resources, and the public and private beaches and shorelines of the United States), the OSC shall direct all Federal, State, and private actions to remove the discharge or to mitigate or prevent the threat of the discharge.

1610 National Response Doctrine

The National Incident Management System (NIMS) Incident Command System is the recognized standard with which management systems must demonstrate compatibility and is the measure by which regulatory agency plan reviewers, exercise evaluators, and spill responders will gauge the adequacy of response actions. While this system allows considerable operational flexibility, it included a collaborative planning process that delineates key management position responsibilities, common use of forms, essential Incident Action Plan elements and response personnel and equipment resource tracking methods.

Under the NIMS Guidance, Incident Resource typing, for both equipment and overhead personnel typing protocols will be forthcoming. Resource typing, which is based upon capability, will provide a basis for which resources can be requested to support response to incidents nationwide. For example, the Coast Guard Sector will provide trained and qualified Type III Command and General Staff personnel, with some key Type III Unit Leader Positions within the Sections.

Section 4201 of OPA 90 amended Subsection I of Section 311 of the FWPCA, to require the Federal OSC to “in accordance with the National Contingency Plan and any appropriate Area Contingency Plan, ensure effective and immediate removal of a discharge, and mitigation or prevention of a substantial threat of a discharge, of oil or a hazardous substance – (i) into or on the navigable waters; (ii) on the adjoining shorelines to the navigable waters; (iii) into or on the waters of the exclusive economic zone; or (iv) that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States.” “In carrying out these functions, the OSC may: (i) remove or arrange for the removal of a discharge, and mitigate or prevent a substantial threat of a discharge, at any time; (ii) direct or monitor all Federal, State, and private actions to remove a discharge; and (iii) recommend to the Commandant that a vessel discharging or threatening to discharge, be removed and, if necessary, destroyed.” If the discharge or substantial threat of discharge of oil or hazardous substance is of such size or character as to be a substantial threat to the public health or welfare of the United States (including but not limited to fish, shellfish, wildlife, other natural resources, and the public and private beaches and shorelines of the United States), the OSC shall direct all Federal, State, and private actions to remove the discharge or to mitigate or prevent the threat of the discharge.

1620 Regional Response Doctrine

The Regional Response Doctrine is comprised of two principle components. These are a standing team which consists of designated representatives from each participating federal agency, state government, and local governments (as agreed upon by the state) of the RRT; and incident specific teams formed from the standing team when the RRT is activated for a response. On incident-specific teams, participation by the RRT Member agencies will relate to the technical nature of the incident and its geographic location.

The RRT IV Standard Operating Procedure can be found at <http://www.rrt4.nrt.org>

1630 Area Response Doctrine

Pursuant to the National Contingency Plan (NCP; 40 CFR Part 300), area committees have been established for each area of the United States that has been designated by the President. The area committees are comprised of personnel from Federal and state agencies who coordinate response actions with tribal and local governments and with the private sector. Area committees, under the coordinated direction of Federal On-Scene Coordinators (FOSC), are responsible for developing Area Contingency Plans (ACPs). Area committees are also required to work with the response community to develop procedures to expedite decisions for the use of alternative response measures.

This plan serves as the Mobile Area Committees Area Contingency Plan, and the Area Response Doctrine in regards to Oil discharges and Hazardous Substance releases.

While it is the policy of the Commandant to mount an aggressive, timely, efficient response, the FOSC must be mindful that the use of government-owned equipment and resources is not to compete with the use of commercial resources.

Government resource should only be used under specific circumstances:

- For “first aid” spill response until contracted commercial resources arrive on-scene and are operating.
- When commercial resources are not available. This assumes that the RP, Qualified Individual, Incident Commander, or cleanup contractor has sought commercial resources but they are not available.
- Government resources can supplement commercial resources. Government resources are not to be used for the convenience of the responsible party.

The Oil Pollution Act of 1990 (OPA 90) reaffirmed the basic principle that the primary source of an oil spill preparedness and response system in the U.S. should be implemented and maintained by the private sector. It is not, nor should it be, the Coast Guard’s intent to compete with the commercial oil and hazardous materials pollution response industry. The utilization of government resources in lieu of commercial resources can place the government in a competitive environment. This is not the intent of OPA 90, as it defeats the incentive for commercial enterprise to maintain equipment and trained personnel in a competitive market. The Coast Guard’s pre-positioned response equipment, other publicly owned response equipment, and other initiatives under the Coast Guard’s oil spill response program are only intended to supplement the oil and clean-up industry’s response program or be used if the commercial industry does not have readily available resources, and only until such time that the Federal On-Scene Coordinator (FOSC) or the Unified Command decides to release the resources.

The FOSC has the authority and responsibility in accordance with the National Contingency Plan to contain, control, and carry out response activities for the removal of a discharge where a substantial threat to public health or welfare, or where natural resources are endangered. At the direction and discretion of the FOSC and the Unified Command, when the responsible party executes a suitable response, any government equipment deployed should be withdrawn as commercial equipment becomes available and is placed into service.

The FOSC may consider using Coast Guard/Department of Defense (DOD) or Oil Spill Cooperative resources in such instances when the spill has been federalized and/or

private sector resources cannot respond to the incident in a timely manner, or there are certain specific resources not available from the private sector.

While it is the policy of the Commandant to mount an aggressive, timely, efficient response, the FOSC must be mindful that the use of government-owned equipment and resources is not to compete with the use of commercial resources. Government resource should only be used under specific circumstances:

- For “first aid” spill response until contracted commercial resources arrive on-scene and are operating.
- When commercial resources are not available. This assumes that the RP, Qualified Individual, Incident Commander, or cleanup contractor has sought commercial resources but they are not available.
- Government resources can supplement commercial resources. Government resources are not to be used for the convenience of the responsible party.

1650 Best Response Concept

Best Response depends on the best efforts of the three components of the National Response System.

Companies – those responsible for producing, handling, storing, and transporting oil and hazardous materials, and for arranging for mitigation of an accidental discharge or release;

Contractors – those who carry out response and cleanup in the event of a discharge or release; and

Government – those Federal, state, and local agencies with oversight responsibility for the safe handling of oil and hazardous materials and for ensuring protection of the public and the environment in the event of a discharge or release.

Best Response protects our national interests. Each component must act responsibly, effectively, and cooperatively to accomplish the shared goal of minimizing the consequences of pollution incidents. Finally, Best Response demands that a response community builds a method to measure its own capability to achieve success. To do this kind of self-assessment the community must be able to recognize success. Key Business Drivers are the major categories within a Best Response model of things that have to be done if we are to accomplish the goal of Best Response – minimize the consequence of pollution incidents – and to be perceived as successful. Critical Success Factors are the specific things that a response must accomplish to be considered successful. There are a number of critical success factors for each Key Business Driver. An oil spill response that achieves all or most of these factors will, according to the Best Response precepts, be judged as a success.

When spilled oil contaminates shoreline habitats, responders must survey the affected areas to determine the appropriate response. Although general approvals or decision tools for using shoreline cleanup methods can be developed during planning stages, responders' specific cleanup recommendations must utilize field data on shoreline habitats, type and degree of shoreline contamination, and spill-specific physical processes. Cleanup endpoints must be established early so that appropriate cleanup methods can be selected to meet the cleanup objectives. Shoreline surveys must be conducted systematically because they are crucial components of effective decisions. Also, repeated surveys are needed to monitor the effectiveness and effects of ongoing treatment methods (changes in shoreline oiling conditions, as well as natural recovery), so that the need for changes in methodology, additional treatment, or constraints can be evaluated.

The Shoreline Assessment Manual, August 2000, NOAA/HAZMAT outlines methods for conducting shoreline assessments. Shoreline assessment is a function conducted under the Planning Section of the Incident Command System (ICS).

NOAA's Shoreline Assessment Manual outlines methods that can be used to plan and conduct shoreline assessment after an oil spill; and can then be incorporated into assessment results of the UC's decision-making process for shoreline cleanup. The Shoreline Assessment Job Aid is a supplement to the manual. It contains visual examples of many of the terms you would use during shoreline assessments.

When to terminate specific oil spill cleanup actions can be a difficult decision; When is clean, clean enough? The increasing cost of the cleanup and the damage to the environment caused by cleanup activities must be weighed against the ecological and economic effects of leaving the remaining oil in place. The decision to terminate cleanup operations is site-specific. Cleanup usually cannot be terminated while the one of the following conditions exist:

- Recoverable quantities of oil remain on water or shores.
- Contamination of shore by fresh oil continues.
- Oil remaining on shore is mobile and may be refloated to contaminate adjacent areas and near shore waters.

Cleanup may normally be terminated when the following conditions exist:

- The environmental damage caused by the cleanup efforts is greater than the damage caused by leaving the remaining oil or residue in place.
- The cost of cleanup operations significantly outweighs the environmental or economic benefits of continued cleanup.

FOSC, after consultation with the members of the Unified Command, determines that the cleanup should be terminated.

1670 Response Technologies

1670.1 Dispersant Use

RRT IV Dispersant Use Guidelines can be found at <http://www.rrt4.nrt.org>

During the Deepwater Horizon BP oil spill in 2010, dispersants were used in unprecedented volumes and applications for any spill occurring within the waters of the United States. Due to the perceived uncertainties that surrounded using dispersants in such a manner, media visibility and scrutiny on the subject was greater than ever, and certain misinformation was ultimately circulated regarding the impacts. As a result of the scrutiny and ongoing litigation, it is unlikely that the FOSC, without the assistance of a Responsible Party, will be able to acquire the necessary permission to access and use a dispersant stockpile, absent relief from a dispersant manufacturer, on a federalized response. Therefore, FOSCs should plan for complications that are likely to preclude the usage of dispersants on spills where there is no viable responsible party.

The dispersant pre-approval is designed to provide for the timely use of dispersants along with mechanical techniques and in-situ burning for offshore oil spill responses. The objective of the Regional Response Team IV (RRT IV) FOSC Dispersant Pre-approval Guidelines and Checklist is to provide for meaningful, environmentally safe, and effective dispersant operation. The programmed checklist approach allows the FOSC to quickly arrive at a logical “GO/NO GO” decision. This gives the dispersant operation the opportunity to begin in a timely manner that is consistent with attempting to maximize the effectiveness of dispersant use as a countermeasure to reduce the impact of oil spills. Nothing in this process is intended to address responder immunity for any Oil Spill Removal Organization (OSRO) or to indemnify a dispersant manufacturer against any future litigation.

Should a FOSC be approached by any OSRO requesting certain language in any response documentation in order to bolster a derivative immunity defense, the FOSC should immediately seek assistance from their CG District Eight legal office and notify the

Office of Maritime and International Law (CG-0941), Prevention Law Division duty attorney, through the National Command Center (NCC). Access to the CG District Eight legal attorney is available 24/7 via the CG District Eight command center at 504-589-6225. NCC 24/7 contact via 202-372-2100. Additionally, FOSCs are requested to contact their servicing legal staffs and CG-0941, Prevention Law Division duty attorney, via above means 24/7, as soon as it is contemplated that dispersants will be used on ANY oil spill.

1670.2 In-situ Burn Approval/Monitoring/Decision Protocol

RRT IV In-Situ Burn Preapproval Guidelines can be found at <http://www.rrt4.nrt.org>

More information regarding the use of in-situ burn checklists for the Sector Mobile COTP Zone can be found in Section 9260.14.

1670.3 Bioremediation Approval/Monitoring/Decision Protocol

RRT IV Bioremediation guidelines can be found at <http://www.rrt4.nrt.org>

Contact information regarding the use of Bioremediation can be found in Section 9260.10.

1670.4 Special Monitoring of Applied Response Technologies (SMART)

Special Monitoring of Applied Response Technologies (SMART) is a cooperatively designed monitoring program for in situ burning and dispersants. SMART relies on small, highly mobile teams that collect real-time data using portable, rugged, and easy-to-use instruments during dispersant and in situ burning operations. Data are channeled to the Unified Command (UC) (representatives of the spiller and the state and federal governments who are in charge of the spill response) to address critical questions:

- Are particulates concentration trends at sensitive locations exceeding the level of concern?
- Are dispersants effective in dispersing the oil?

Having monitoring data can assist the Unified Command with decision-making for dispersant and in situ burning operations.

The SMART program is a joint project of these agencies:

- U.S. Coast Guard

- NOAA
- U.S. Environmental Protection Agency
- Centers for Disease Control and Prevention
- Bureau of Safety and Environmental Enforcement

More information regarding SMART may be found in Section 9260.14.

1670.5 Alternative Response Tool Evaluation System (ARTES)

During an oil spill or hazardous substance release, the OSC may consider using non-conventional alternative countermeasures (a method, device, or product that has not been typically used for spill response). To assess whether a proposed countermeasure could be a useful response tool, it is necessary to quickly collect and evaluate the available information about it.

To aid in evaluating non-conventional alternative countermeasures in particular, the Alternative Response Tool Evaluation System (ARTES) was developed. ARTES can also be used to evaluate proposed conventional countermeasures. It is designed to evaluate potential response tools on their technical merits, rather than on economic factors. ARTES is designed to work in concert with the National Contingency Plan Product Schedule and the Selection Guide for Oil Spill Applied Technologies.

For more information regarding ARTES refer to the NOAA Office of Response and Restoration Website.

1680 Statutory Guidance Federal

1680.1 Comprehensive Environmental Response, Compensation and Liability Act, 1980

Enacted by congress in 1980, it is also known as the Hazardous Substance Superfund as defined by 42 U.S.C. 9601 et seq. Its purpose is to provide for liability, compensation, cleanup, and emergency response for hazardous substances, pollutants, or contaminants (as defined by the statute) released into the environment and the cleanup of inactive

hazardous waste disposal sites. Emergency and time critical actions for pollutants or contaminants may only be taken when these releases pose an imminent and substantial threat to human health or the environment. The NCP outlines factors which shall be considered in determining the appropriateness of an emergency or time-critical response action. These factors include:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants, or contaminants;
- Actual or potential contamination of drinking water supplies or sensitive ecosystems;
- Hazardous substance, pollutant, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;
- High levels of Hazardous substance, pollutant, or contaminants in soils largely at or near the surface, that may pose a threat of release;
- Weather conditions that may cause hazardous substance, pollutant, or contaminants to migrate or be released;
- Threat of fire or explosion;
- The availability of other appropriate federal or state response mechanisms to response to the release; and
- Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

1680.2 Federal Water Pollution Control Action as amended by the Clean Water Act and the Oil Pollution Act of 1990

As listed in 33 U.S.C. 1251 et seq., the objective of the act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The goals of the Act include:

- The elimination of pollutants discharged into navigable waters;

- Attain water quality, which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and around those waters;
- Prohibits the discharge of toxic pollutants;
- Provides Federal financial assistance to construct publicly owned waste treatment works;
- Requires States to provide waste treatment management plans;
- Conducts research to develop technology in order to eliminate the discharge of pollutants into the navigable waters, waters of the contiguous zone, and oceans; and
- Develop national policy for the control of non-point sources of pollution.

1680.3 National Historic Preservation Act

The National Historic Preservation Act of 1966 (Public Law 89-665) requires agencies using federal funds to identify, evaluate, and where significant, protect historic, archaeological, and traditional cultural properties. This Act also authorized the National Register of Historic Places, expanding Federal recognition to historic properties of local and State significance. The National Park Service in the DOI administers both programs. Regulations for these programs are contained in 36 CFR Part 60, National Register of Historic Places, and 36 CFR Part 65, national Historic Landmarks Program. Oil can contaminate archaeological, historic, and culturally sensitive resources. Such contamination can prevent carbon dating, damage the fragile artifacts, and make restoration and preservation extremely difficult or impossible. In addition, oil spill response activities (e.g., mechanical cleanup and staging area construction) can physically disturb or destroy artifacts and sites.

The primary contact for responders seeking information and expertise on local culturally sensitive areas is the State Archeologist in the State Historic Preservation Office for the State or the Tribal Historic Preservation Officer for the affected tribal lands. It is important that responders be aware of the types of archaeological, cultural, or historic materials that they are likely to encounter while responding to an incident and that they will immediately notify the FOSC/UC in the event that these types of materials are discovered.

The MOBAC will regularly review response strategies outlined in the GRPs to identify and revise any strategies that may adversely impact archaeological, cultural, or historic resources. These resources are protected under Federal, Tribal and State laws. In order to

avoid any inadvertent impacts to cultural and historic resources, responders are required to utilize existing hardened access paths and paved areas, if available, when approaching shorelines and cleanup teams are to remain on beaches.

1680.4 Endangered Species Act

Oil spills or hazardous substance release response actions may impact species listed as “endangered” or “threatened” under the Endangered Species Act (ESA), 50 CFR Part 402.02, and in accordance with Section 7 of the ESA, Federal agencies must consult with NOAA’s National Marine Fisheries Service (NOAA Fisheries) and/or the U.S. Fish and Wildlife Service (USFWS) on activities that may affect a listed species. The FOSC is responsible for initiating consultation.

In 2001, the USCG, EPA, DOI’s Office of Environmental Policy and Compliance, USFWS, NOAA Fisheries, and the National Oceans Service (NOS) signed an Interagency Memorandum of Agreement (MOA)

(Refer to: <http://www.nrt.org/Production/NRT/NRTWeb.nsf/PagesByLevelCat/Level2ESAMOU?OpenDocument>)

regarding Oil Spill Planning and Response Activities under the Federal Water Pollution Control Act’s National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the ESA. In the MOA, NOAA Fisheries and USFWS determined that oil spill response activities qualify as an emergency action as defined by regulations implementing the ESA in 50 CFR Part 402.02. NOAA Fisheries and USFWS have developed emergency consultation procedures to allow action agencies to incorporate endangered species concerns into emergency response activities. Emergency consultation is initiated with a telephone call to NOAA Fisheries or USFWS to describe the emergency response and seek recommendations on any measures that could be implemented during the response to reduce or avoid impacts to listed species, the paperwork associated with emergency consultation under the ESA is completed after the removal actions are completed. NOAA Fisheries and USFWS are ready to assist the FOSC comply with section 7 of the ESA, and the NOAA SSC and DOI Regional Environmental Officer can help identify appropriate ESA section 7 consultation contacts for their respective Departments.

For Endangered Species Act Consultation Contacts:

- U.S. Department of the Interior
 - Regional Environmental Officer
 - 24-Hour (617) 592 5444

- National Oceanic & Atmospheric Administration
 - Scientific Support Coordinator

Please refer to Section 9240.4 for Wildlife Rescue Organizations.

1680.5 Resource Conservation and Recovery Act

Also known as the Solid Waste Disposal Act, it was enacted by congress as 42 U.S.C. 6901 et seq. The Congress declared it to be the national policy of the United States that, whenever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated should be treated, stored, or disposed of as to minimize the present and future threat to human health and the environment.

1680.6 National Environmental Policy Act

As defined in 42 U.S.C. 4321 et seq., the purposes of this act are:

- To declare a national policy which will encourage productive and enjoyable harmony between man and his environment;
- To promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man;
- To enrich the understanding of the ecological systems and natural resources important to the Nation; and
- To establish a Council on Environmental Quality.

1690 High-Seas Policy

Application of the Intervention on the High Seas Act (33 USC 1471 et seq.): Under authority of the International Convention Relating to Intervention on the High Seas in Cases of Oil Pollution Casualties, 1969, governments party to the present convention may take such measures on the high seas as may be necessary to prevent, mitigate, or eliminate grave and imminent danger to their coastline or related interests from oil or hazardous substance pollution or threat of pollution. The pollution or threat of pollution may result from a maritime casualty or acts related to such a casualty, which may reasonable be expected to result in major harmful consequences. In the event of a ship outside U.S. Territorial waters which creates a potential threat of pollution by oil of hazardous substances, all available information shall be relayed to the Coast Guard which will determine whether or not grave and imminent danger to the U.S. coastline or related interests exists. Once that determination is made, the designated FOSC shall take measures to prevent, mitigate, or eliminate the threat.

2100 Unified Command

The Unified Command Structure (UCS) provides an organization capable of anticipating and responding to pollution response emergencies.

The UCS is based on the Incident Command System (ICS) and is intended to provide a “common ground” to jointly coordinate command and control for a large number of response agencies. UCS is designed to bring together continuous decision making input from response groups at every level: City, County, State, Federal and the commercial community.

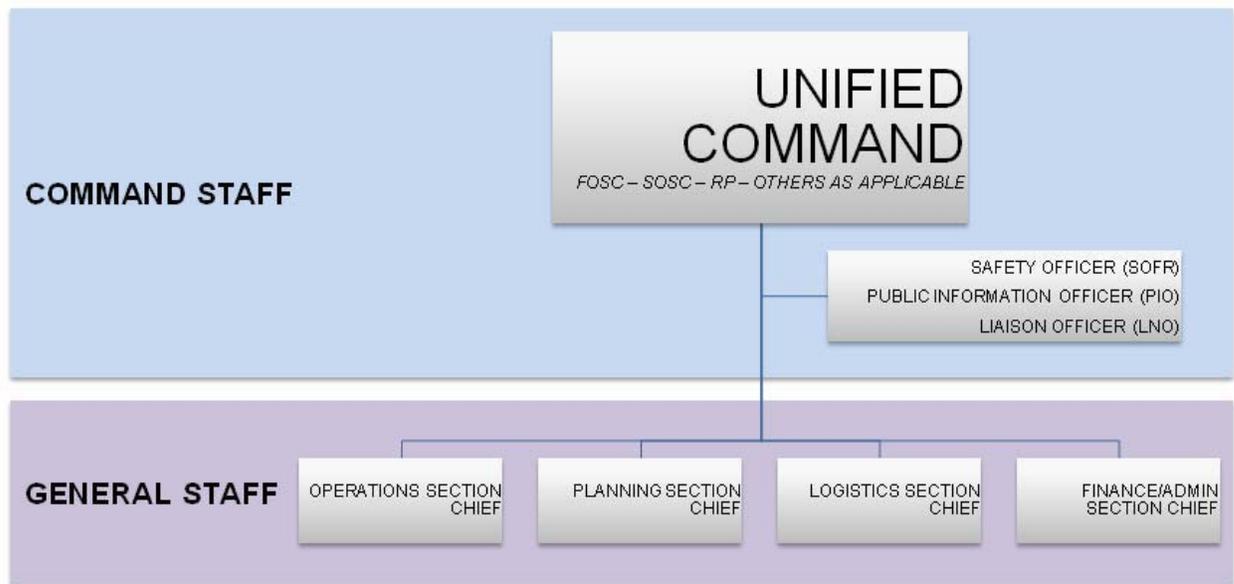


FIGURE 2100-1: Unified Command Structure

Each response agency and group is responsible to participate in UCS at the appropriate decision making level. The UCS is designed to develop proactive consensus building in anticipation of response requirements, making liaison and direct communication between key response decision makers an integral and continuous part of the emergency response process. Each agency retains its own organizational identity, chain of command and direct control of personnel and resource tasking. See Figure 1.

While a single IC normally handles the command function, an ICS organization may be expanded into a UC. As a component of an ICS, the UC is a structure that brings together

the “Incident Commanders” of all major organizations involved in the incident to coordinate an effective response while at the same time carry out their own jurisdictional responsibilities. The UC links the organizations responding to the incident and provides a forum for these agencies to make consensus decisions. Under the UC, the various jurisdictions and/or agencies and non-government responders may blend together throughout the organization to create an integrated response team. The UC may be used whenever multiple jurisdictions are involved in a response effort. These jurisdictions could be represented by:

Geographic boundaries (e.g., two States, Indian Tribal Land);

Governmental levels (e.g., Federal, State, Local,);

Functional responsibilities (e.g., fire, oil spill, EMS);

Statutory responsibilities (e.g., Federal Land Managers, RP OPA 90 or CERCLA); or

Some combination of the above.

Unified Command make-up for a specific incident will be determined on a case-by-case basis taking into account:

(1) the specifics of the incident;

(2) determinations outlined in existing response plans; or

(3) decisions reached during the initial meeting of the UC. The makeup of the UC may change as an incident progresses, in order to account for changes in the situation.

The UC is a team effort, but to be effective the number of personnel should be kept as small as possible. A well-defined process requires the UC to set clear objectives to guide the on-scene response resources.

The UC is responsible for overall management of the incident. The UC directs incident activities, including development and implementation of overall objectives and strategies, and approves ordering and releasing of resources. The UC is not a “decision by committee”. The principals are there to command the response to an incident. Time is of the essence. The UC should develop synergy based on the significant capabilities that are brought by the various representatives. There should be personal acknowledgement of each representative’s unique capabilities, a shared understanding of the situation, and agreement on the common objectives. With the different perspectives on the UC comes the risk of disagreements, most of which can be resolved through the understanding of the underlying issues. Contentious issues may arise, but the UC framework provides a forum and a process to resolve problems and find solutions.

A cooperative attitude and a thorough understanding are essential. So does a thorough understanding of the ICS IAP Cycle. Nevertheless, situations may arise where consensus

agreement may not be reachable. In such instances, the UC member representing the agency with primary jurisdiction over the issue would normally be deferred to for the final decision.

The UC has certain responsibilities as noted above. Failure to provide clear objectives for the next operational period means that the Command function has failed. While the UC structure is an excellent vehicle (and the only nationally recognized vehicle) for coordination, cooperation, and communication, the duly authorized representatives must make the system work successfully. A strong Command--a single IC or UC—is essential to an effective response.

Each UC member may assign Deputy Incident Commander(s) to assist in carrying out IC responsibilities. UC members may also be assigned individual legal and administrative support from their own organizations.

Refer to Section 5-1 in the USCG IMH COMDTPUB P3120.17A Aug. 2006 for more detailed information on Unified Command or at <http://homeport.uscg.mil/ics>.

2110 Command Representative

Federal, state, and responsible party Incident Commanders should utilize the *Incident Commander Job Aid* found on Homeport (<https://homeport.uscg.mil/ics>) to guide initial actions.

2110.1 Federal Representative

In accordance with the NCP (40 CFR 300.120), the Sector Mobile Commander shall serve as the pre-designated Federal On-Scene Coordinator (FOSC)/Incident Commander (IC) for oil discharges, including facilities and vessels under the jurisdiction of another federal agency, within or threatening the coastal zone, except when the sole source of the discharge is from a facility or vessel under the jurisdiction, custody, or control of the Department of Defense (DOD) or Department of Energy (DOE). During such incidents, the DOD or DOE shall serve as the FOSC for responses within their respective jurisdictions.

FOSC authority may be placed on a higher authority within the U.S. Coast Guard during

a major oil spill, such as a Worst Case Discharge, although the Sector Mobile Commander may remain as the IC for the local response efforts within the incident specific response organization. The Environmental Protection Agency shall serve as the pre-designated FOSC for oil discharges and hazardous substances releases in the inland zone.

The EPA Emergency Response Program consists of emergency response FOSCs located in the region office in Atlanta, Georgia, however they may respond to any location throughout the region, or throughout the country, as needed. The FOSCs are responsible for determining the source, cause, and responsible party, as well as initiating source control and enforcement actions as appropriate. Additional responsibilities include ensuring containment cleanup and disposal are carried out adequately, notification of all Natural Resource Trustees, and coordination of activities with federal, state, tribal, and local agencies. EPA also has access to technical assistance contractors who can provide technical oversight and other resources at spill and uncontrolled hazardous waste sites. In some cases, EPA's technical assistance contractor may arrive on scene prior to the FOSC. Prior to the arrival of the EPA OSC, the EPA contractor will cooperate with on-site agencies but will take direction through the EPA OSC only.

The first federal official affiliated with an NRT member agency to arrive at the scene of a discharge should coordinate activities under the NCP and is authorized to initiate, in consultation with the FOSC, any necessary actions normally carried out by the FOSC until the arrival of the predesignated FOSC. This official may initiate federal Funding actions only as authorized by the FOSC.

The FOSC shall, to the extent practicable, and as soon as possible after the incident occurs:

Collect pertinent facts about the discharge, such as its source and cause;

Identify responsible parties, the nature, amount, and location of discharged materials along with predicting the trajectory of discharged materials;

Determine whether the discharge is a worst case discharge, the pathways to human and environmental exposure, the potential impact on human health, welfare, safety and the environment and whether the discharge poses a substantial threat to the public health or welfare;

Identify the potential impact on natural resources and property;

Discuss priorities for protecting human health, welfare and the environment;

Ensure appropriate resource documentation;

Ensure that the trustees for natural resources are promptly notified of discharges and coordinate all response activities with the affected Natural Resource Trustees and shall consult with the affected trustees on the appropriate removal action to be taken;

Consult with the Regional Response Team IV (RRT), when necessary, in carrying out the requirements of the NCP and keep the RRT informed of activities under the NCP;

Notify the Health and Human Services (HHS) representative to the RRT in instances where a public health emergency exists;

Submit pollution reports to the RRT and other appropriate agencies as significant developments occur during response actions, through communication networks or procedures agreed to by the RRT and covered in the RCP;

Ensure that all appropriate public and private interests are kept informed and that their concerns are considered throughout a response, to the extent practicable.

2110.2 State Representative

Each state governor is requested to designate a lead state agency that will direct state-led response operations. This agency is responsible for designating the lead state response official for federal and/or state-lead response actions, and coordinating/communicating with any other state agencies, as appropriate. For the MOB ACP region, this official may come from the state of Florida, Alabama, or Mississippi Bureau of Emergency Response depending on jurisdiction and act as the State On-Scene Coordinator (SOSC) in the Unified Command.

The SOSC is responsible to ensure all pertinent resource, cultural, archaeological, environmental and economic issues are discussed and decisions within the UC are based on sound state-specific information. This individual must be able to make decisions with minimal internal agency consultation.

Because state and local public safety organizations may be the first government representatives at the scene of a discharge or release, they are expected to initiate public safety measures that are necessary to protect public health and welfare that are consistent with containment and cleanup requirements in the NCP, and are responsible for directing evacuations pursuant to existing state or local procedures. State and local governments, however, are not authorized to take actions under Subpart D of the NCP that involve expenditures of the Oil Spill Liability Trust Fund (OSLTF) unless a Pollution Removal Funding Authorization (PFRA) has been completed between the FOSC and local government representative.

2110.3 Local Representation to the Unified Command

When a local jurisdiction holds interest in an incident they will communicate concerns to the Unified Command via the Liaison Officer or the SOSC, or who may be assigned to another position in the response organization.

2110.4 Responsible Party (RP) Representative

Under OPA 90, the responsible party has primary responsibility for cleanup of a discharge. The response shall be conducted in accordance with their applicable response plan. Section 4201(a) of OPA 90 states that an owner or operator of a tank vessel or

facility participating in removal efforts shall act in accordance with the NCP and the applicable response plans as required.

Section 4202 of OPA 90 states that these response plans shall be consistent with the requirements of the NCP and ACPs. Each owner or operator of a tank vessel or facility required by OPA 90 to submit a response plan shall, do so in accordance with applicable regulations. Facility and tank vessel response plan regulations, including plan requirements, are located in 33 CFR Parts 154 and 155, respectively.

As defined by OPA 90, each responsible party of a vessel or a facility from which oil is discharged, or which poses a substantial threat of a discharge, into or upon the navigable waters or adjoining shorelines or the Exclusive Economic Zone is liable for the removal costs and damages specified in Subsection (b) of Section 1002 of OPA 90. Any removal activity undertaken by a responsible party must be consistent with the provisions of the NCP, the Regional Contingency Plan (RCP), the ACP, and the applicable response plan required by OPA 90. Each responsible party for a vessel or facility from which a hazardous substance is released, or which poses a substantial threat of a discharge, is liable for removal costs as specified in the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 U.S.C. 9601 et seq.).

2120 Area ICS Command

An Area Command is established when the complexity of the incident and incident management span-of-control considerations so dictate. Generally, the administrator(s) of the agency having jurisdictional responsibility for the incident makes the decision to establish an Area Command. The purpose of an Area Command is either to oversee the management of multiple incidents that are each being handled by a separate ICS organization or to oversee the management of a very large or complex incident that has multiple incident management teams engaged. This type of command is generally used when there are a number of incidents in the same area and of the same type, such as two or more oil spills. These are usually the kinds of incidents that may compete for the same resources. When incidents are of different types and/or do not have similar resource demands, they are usually handled as separate incidents or are coordinated through an EOC. If the incidents under the authority of the Area Command span multiple jurisdictions, a Unified Area Command should be established. This allows each jurisdiction involved to have appropriate representation in the Area Command.

The structure of the Area Command follows standard ICS organization except there is no operations section.

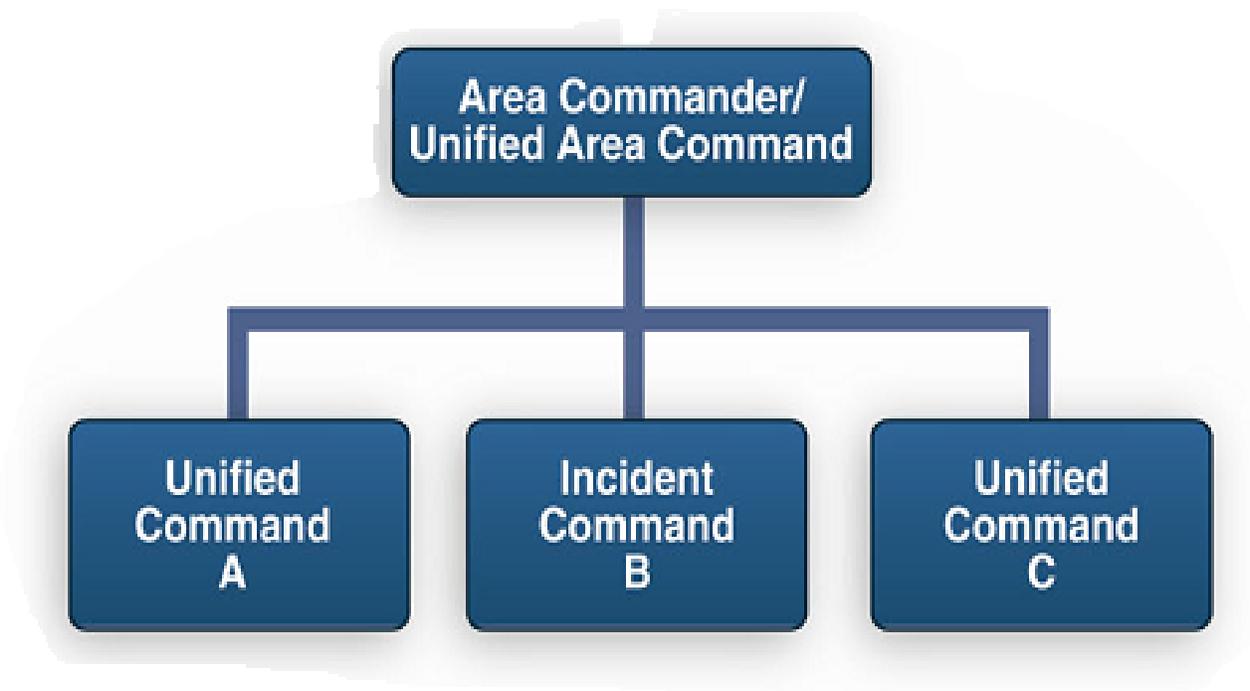


Figure 2120-1 Area Command Structure

2120 Guidance for Setting Response Objectives

Criteria for developing response objectives:

Achievable – Realistic; Can the end state be achieved as desired (time, quality, cost, etc.)

Measurable – What are the measures to determine desired progress or the end state has been achieved?

Flexible – Can alternative strategic or tactical courses of action be applied to better results?

2120.1 Discovery and Notification

Reports of an actual or potential oil discharge may come from a variety of sources: vessels, facilities, aircraft, private citizens, other government agencies, the news media, or the National Response Center (NRC). The FOSC ensures notification of the appropriate state agency of any state which is, or may reasonably be expected to be, affected by the discharge. Section 9100 and 9120 – Notifications and Initiation of Response provides guidance and contacts in order to alert the response community and stakeholders of a discharge or release.

2120.2 Preliminary Assessment and Initiation of Action

Once the spill's location is ascertained, determination of the pre-designated FOSC should be made in accordance with the RCP. If it is not in the coastal zone, notify the EPA FOSC and be prepared to assist and direct the response until the EPA FOSC arrives on-scene.

After receiving a report of an oil spill and notifying the appropriate entities, the FOSC should begin planning the proper level of response and resource allocation. Use a chart of the area—one which covers the smallest practical area so the greatest detail is visible—and database to evaluate the details. Consult a good road map to determine the best access route for responders.

Evaluate the actual or threatened discharge's magnitude and severity and assess the effectiveness of possible removal operations. This may require on-scene verification and evaluation, determining a hazard and area environmental vulnerability assessment, and an overflight to determine the size, location, and movement of the discharge. The FOSC should base an assessment on objective consideration of these factors. If a discharge threatens, decide how substantial the threat is according to Federal Water Pollution Control Act guidelines. Using federal funds may depend on such a determination. The optimum time for completing an evaluation is within one hour of receiving the report of the spill. After identifying the spill's geographic area, determine:

the location of pre-arranged staging areas, command posts, and equipment;
the availability of boat ramps in the area; and
vulnerable resources in the area, including water intakes, marina, marshes, and wildlife.

The FOSC must ensure an adequate surveillance of the spill response. If the Responsible Party does not take prompt, efficient action or is unknown, the FOSC must take necessary actions to eliminate the threat or remove the discharge.

When the FOSC receives a report of a discharge, the following general patterns of response are normally taken:

- (1) Investigate;
- (2) Officially classify the size (i.e., minor, medium, major) and type (i.e., substantial threat to the public health or welfare, worst case discharge) of the discharge and determine the course of action;
- (3) Determine if the Responsible Party can achieve effective removal, mitigation or prevention, and if so, determine whether removal is being done properly;
- (4) Determine, where appropriate, whether a state or political subdivision has the capability to carry out any or all removal actions; and
- (5) Make prompt notifications of the trustees.

If the initial evaluation indicates an actual or potential medium or major discharge, the FOSC should advise the Regional Response Team IV (RRT) of the need to initiate further federal response actions. After assessing the hazards the FOSC should advise them of the following:

Whether cleanup or preventive action is necessary

Whether RRT activation is required

Whether additional resources are needed

Whether the Responsible Party is taking responsibility for the cleanup operation and whether the response is immediate and effective

Whether containment, countermeasures, cleanup, and disposal are required

The following classifications of oil discharges serve as guidance for the pre-designated Federal OSC as specified under 40 CFR 300.5:

COASTAL WATERS (Coast Guard)	INLAND WATERS (EPA)
Minor: <10,000 gals	Minor: <1,000 gals
Medium: 10,000-100,000 gals	Medium: 1,000-10,000 gals
Major: >100,000 gals	Major: >10,000 gals

NOTE: Any discharge that poses a substantial threat to public health or welfare, or results in a critical public concern shall be classified as a "major discharge."

2120.3 Containment, Countermeasures, Cleanup, and Disposal

Containment, countermeasures, and cleanup are defensive response actions. The FOSC must ensure that initial response action begins as soon as possible after either an actual or threatened oil discharge is discovered. The goal of initial response is to protect public health and welfare and may require the following actions:

- controlling the source of the discharge,
- limiting the spread of the pollution, and
- mitigating the effects of the pollution.

Mitigating the pollution's effect may include recovering oil from the water and affected lands, which may require using equipment such as sorbents or oil skimmers, either the cleanup contractor's or prepositioned. The FOSC must ensure that the Responsible Party is cleaning up the spill promptly and effectively and mitigating its effects. If not, the FOSC must assume federal responsibility and hire and directly supervise the cleanup contractor.

The FOSC must recognize that each habitat or milieu possesses unique qualities which may require different cleanup techniques to accomplish the two goals of removing as

much pollutant as possible while minimizing environmental damage from the cleanup technique and further weigh these goals against such constraints as the technology, equipment, and personnel available.

While recoverable quantities of oil in the water should be contained and removed if practical, often times immediate containment is not possible, necessitating a shoreline cleanup. Nonetheless cleanup forces should examine the feasibility of open water containment and removal—especially if they can achieve containment before a potential spill becomes an actual one.

Dispersants or chemicals may mitigate pollution damage more effectively than mechanical or physical methods. The NCP's Subpart J describes the criteria for using dispersants and other chemicals. The NCP Product Schedule and product bulletins periodically update the latest list of EPA accepted chemical agents and additives, including technical data, application criteria, effectiveness, and toxicity. The use of any alternative response technologies, including dispersants, must be done in accordance with RRT IV's policy.

If shoreline contamination is expected, the FOSC should ask several questions to determine if cleanup is an appropriate response:

- Will cleanup activities cause more damage than leaving the oil to natural recovery or dissipation?
- Will cleanup activities severely disrupt shoreline bird or mammal colonies?
- Does the oil have a relatively low toxicity?
- Will storms or seasonal erosion cycles remove the oil from the shoreline?
- Does the oil degrade rapidly or slowly?
- Does the shoreline have a high energy level?
- Is the oil present on the surface of the substrate and likely to remain there rather than being incorporated into sediments or buried by seasonal cycles?

- Is it likely the oil will migrate to adjacent shoreline or near-shore areas?
Whether the polluter or the federal government conducts the removal, the FOSC determines removal completeness (“How clean is clean?”) and authorizes termination of operations. Where uncertainty exists, the FOSC may seek the advice of the RRT in making this determination. Generally, for oil discharges, removal is “complete” when:
 - There is no longer any detectable oil present on the water, adjoining shorelines, or places where it is likely to reach the water again; or
 - Further removal operations would cause more environmental harm than the oil to be removed; or
 - Cleanup measures would be excessively costly in view of their insignificant contribution to minimizing a threat to the public health or welfare, or the environment; and

- Activities required to repair unavoidable damage resulting from removal actions have been performed.

Oil recovered in cleanup operations shall be disposed of in accordance with the RCP, ACP Waste Disposal Plan, and any applicable laws, regulations, or requirements. RRT and ACP guidelines may identify the disposal plans to be followed during a spill response and may address: sampling, testing, and classifying of recovered oil and oiled debris; segregation and stockpiling of recovered oil and oiled debris; prior state disposal approvals and permits; and the routes; methods (e.g., recycle/reuse, on-site burning, incineration, land filling, etc.); and sites for the disposal of collected oil, oiled debris, and animal carcasses.

2120.4 Documentation and Cost Recovery

All OSLTF users need to collect and maintain documentation to support actions taken under the FWPCA. For a spill in which the federal government assumes responsibility for cleanup operations, documenting federal response efforts is essential so it can recover its costs from parties responsible for the spill to replenish the revolving fund. Documentation serves several other useful purposes as well.

- Through reports (SITREPS), informs response personnel at other organizational levels and agencies.
- It provides evidence to support imposing civil or criminal sanctions.
- It documents federal expenditures to recover costs from the Responsible Party.
- It documents OSC decisions and actions throughout the incident.
- It forecasts program resource levels needed for pollution response.

2130 Response Objectives by Operational Period

Typical operational objectives for the **initial response (emergency) phase** include (in no particular order):

Confirm the existence and extent of the spill/release

Secure the source of the spill

Evaluate the extent of contamination

Confirm/execute all notifications to concerned local, county, state, and federal agencies. (HomePort, State Warning Point, etc.)

Assemble and establish a unified agency response group on-scene

Ensure safety to the responders and public

Assess the need to mobilize additional contract response resources (it is generally better to mobilize early (then release if the asset is not needed) rather than delay for fear of overreaction

Establish a public information group

Establish a defined response organization

Examine key response financial issues (see Section 6000 Finance and Administration)

Typical operational objectives for the **first operational period** include (in no particular order):

Fully evaluate/reconnaissance the extent of contamination

Implement the unified command organization and verify operations are being conducted in conformity with the National Incident Management System/Incident

Command System

Begin relocation of Incident Command functions from on-scene unified operations group operations center to off-site/suitable Unified Command Post

Commence Incident Planning cycle, including initial response strategies, objectives and Incident Action Plan

Liaison Officer: initiate contact with local municipalities and establish communication channels

Safety Officer: develop, train on, and deploy initial site-specific safety and health plan (product MSDS if available) by coordinating with contractor and government safety plans

Information Officer: Define/confirm media relations approach with Unified

Command; establish Joint Information Center, prepare first press release and organize first media briefing

Typical operational objectives for the **second operational period** include (in no particular order):

Transition from immediate operations driven response posture to a pre-planned operations response posture. By 48 hour mark, establish a good understanding of the extent of the spill/release and overall objectives throughout response organization

Conduct routine situation briefings

Conduct daily objectives, tactics, and planning meetings in accordance with established response meeting schedule

Continue developing daily incident action plans.

Develop Demobilization Plan.

2135 General Response Priorities

The general response priorities, as outlined in the NCP are:

(1) **Safety of human life must be given the top priority** during every response action.

This includes any search and rescue efforts in the general proximity of the discharge and the insurance of safety of response personnel;

(2) Stabilizing the situation to preclude the event from worsening is the next priority. All efforts must be focused on saving a vessel that has been involved in a grounding, collision, fire, or explosion, so that it does not compound the problem. Comparable measures should be taken to stabilize a situation involving a facility, pipeline, or other source of pollution. Stabilizing the situation includes securing the source of the spill and/or removing the remaining oil from the container (vessel, tank, or pipeline) to prevent additional oil spillage, to reduce the need for follow-up response action, and to minimize adverse impact to the environment;

(3) The response must use all necessary containment and removal tactics in a coordinated manner to ensure a timely, effective response that minimizes adverse impact to the environment;

(4) All parts of this national response strategy should be addressed concurrently, but safety and stabilization are the highest priorities. The FOSC should not delay containment and removal decisions unnecessarily and should take actions to minimize adverse impact to the environment that begins as soon as a discharge occurs, as well as actions to minimize further adverse environmental impact from additional discharges.

These priorities are broad in nature, and should not be interpreted to preclude the consideration of other priorities that may arise on an incident-specific basis.

2140 Area Specific Response Objectives

The following are example objectives applicable to this plan; they can be used as is or modified in response specific risk applications. Objectives need to be specific, measurable, achievable, reasonable, and time-specific to be affective. Also, incident specific objectives may be needed that are not represented in the below examples.

Safety

Provide for the safety and welfare of citizens and response personnel

Provide for the safety and security of responders as well as maximize the protection of the public health and welfare

Identify safety and risk management factors and monitor for compliance for both the public and responders

Implement practices that allow for the safety and welfare of vessel passengers and non-essential crew

Conduct Operational Risk Assessment and ensure controls are in place to protect the responders and the public

Fire/Salvage

Assess damage/stability; develop and implement a salvage plan

Implement the salvage and tow plan

Extinguish fire
Stabilize and salvage vessel(s)

Waterways Management

Conduct port assessment and establish priorities to facilitate commerce
Develop/implement transit plan to include final destination/berth(s) for vessels
Identify safe refuge/berth for impacted vessels.

Oil/Haz Substance

Initial action to control the source and minimize the volume discharges/released
Determine oil/haz substance fate and effect (trajectories)
Identify sensitive areas, develop strategies for protection and conduct pre-impact shoreline debris removal
Conduct an assessment and initiate shoreline cleanup efforts
Remove product from impacted area
Contain, cleanup, recover, and dispose of spilled product(s)

Environmental

Protect environmentally sensitive areas including wildlife and non-environmental properties
Identify threatened species and recover and rehabilitate injured wildlife
Examine efficacy and, if appropriate, utilize alternative technologies to support response effort

Management

Manage a coordinated interagency response effort
Establish an appropriate Incident Management Team organization that can effectively meet the initial and long term challenges required to mitigate the incident
Identify all appropriate agency/organization mandates, practices, and protocols for inclusion in the overall response effort
Identify and minimize social, political, and economical adverse effects
Implement a coordinated response with other response agencies
Evaluate all planned actions to determine potential impacts to social, political, and economic entities
Identify competing response activities (SAR and Pollution mitigation) to ensure that they are closely coordinated
Identify and establish incident support facilities to support interagency response efforts
Keep the public, stakeholders, and the media informed of response activities
Ensure appropriate financial accounting practices are established and adhered to
Establish internal/external resource ordering procedures are established and adhered to
Establish an incident document system

Establish an appropriate structure to facilities communications with stakeholders and agency/organization coordination facilities

2150 ICS Position Specific Job Aids

Available ICS position specific job aids can be found in Section 9000

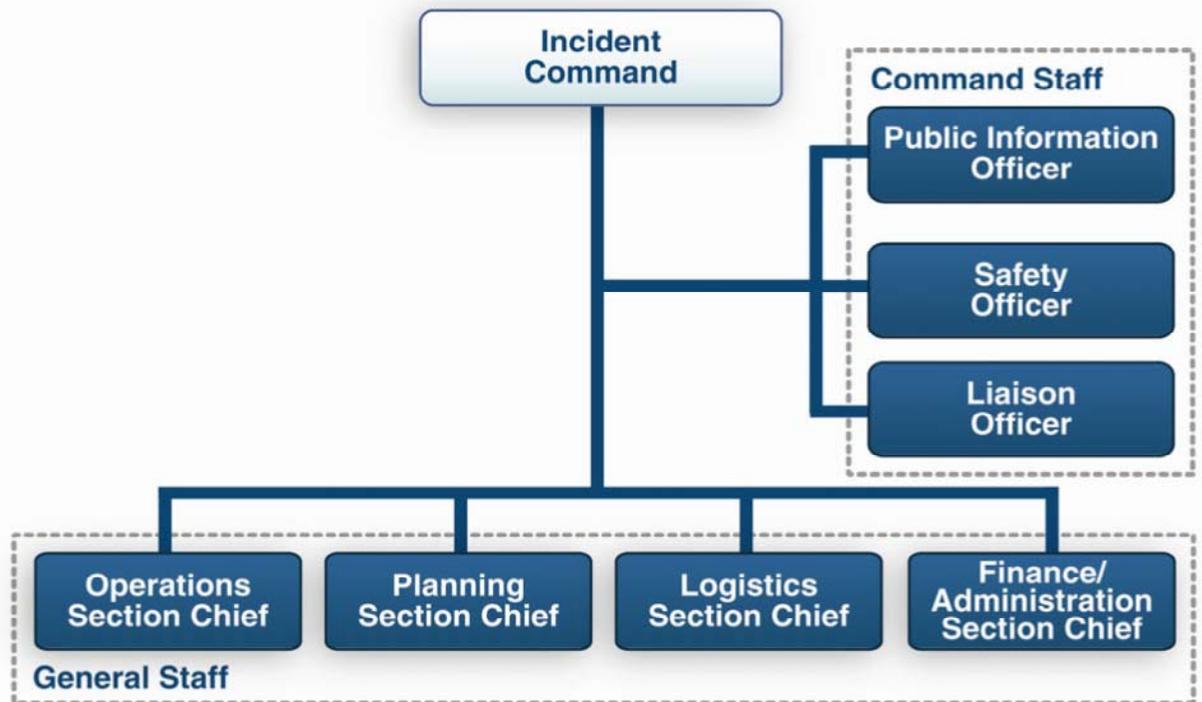
2160 Command/Command Staff

The Unified Command for an oil discharge in the marine environment includes:

- (1) FOOSC – the pre-designated Federal On Scene Coordinator;
- (2) Qualified Individual or Incident Commander representing the Responsible Party;
- (3) The pre-designated SOOSC representing State and local response agencies, and;
- (4) Other federal trustees as applicable by law or regulation.
(See also NOAA Scientific Support Coordinator).

The responsibilities of the Unified Command include:

- Mobilize, implement and manage the UCS organization needed to accomplish response objectives
- Assess incident priorities
- Determine strategic goals and tactical objectives
- Develop or approve the Incident Action Plan and ensure each agency implements and accomplishes those actions for which they are responsible
- Approve access to the Oil Spill Liability Trust Fund (OSLTF) and set response funding ceilings
- Anticipate response needs and authorize the ordering, deploying, and demobilization of response resources
- Serve as the ultimate safety authority, approve the Site Safety Plan, and ensure the maximum achievable level of worker health and safety for all responders
- Authorize information releases to the media and participate in scheduled press conferences



2160.1 Deputy Federal On-Scene Coordinator (FOSC)

The responsibilities of the Deputy FOSC include:

Monitor and direct the Command Staff and the Section Chiefs to accomplish the strategic goals and tactical strategies defined in the Incident Action Plan

Serve as the OSC, in the absence of the OSC

Identify and establish priorities related to the internal management and organizational structure of the UCS

See also ICS Job Aid – Incident Commander

2160.2 Safety Officer

The responsibilities of the Safety Officer and his or her assistant and safety observers include:

- Identify and evaluate safety and health hazards that may impact both response workers and the public, designate exclusion zone boundaries, and determine levels of personal protective equipment required
- Write and update the Site Safety Plan
- Implement and manage the Safety Staff needed to continuously monitor and evaluate safety and health conditions and to prevent unsafe conditions
- Insure that all responders have adequate skills to safely perform assigned tasks and that required levels of training are documented
- Provide or coordinate health and safety training and regular safety briefings required to perform response activities

- Coordinate with public, government, and industry health and safety officials regarding public health concerns, including evacuations, limiting access to public areas, beach closures, and fisheries restrictions
- Resolve and identify to the Unified Command significant safety and health issues
- See also Section 2200 Health and Safety

2160.3 Liaison Officer

The responsibilities of the Liaison Officer and his/her assistants include:

- Serve as the initial point of contact for participating response agencies and groups and identify assignments to appropriate UCS sections
- Receive and coordinate all calls from public and private entities offering assistance or requesting information
- Resolve and identify to the Unified Command public and private concerns related to the status and effectiveness of the response
- Serve as U/C point of contact for Volunteer Coordinator(s)
- Network with Resources Unit Leader for Volunteer tasking through the Volunteer Coordinator
- See also Section 2400 Liaison Officer

2160.4 Public Affairs Officer

The Information Officer is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to other appropriate agencies and organizations.

Only one Information Officer will be assigned for each incident, including incidents operating under UC and multi-jurisdictional incidents. The Information Officer may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions.

The responsibilities of the Public Affairs Officer and his or her assistants include:

- Serve as the central clearing point for the dissemination of official information representing the UCS to the media
- Implement and manage the Joint Information Center (JIC) as the central location for disseminating official information
- Schedule, organize, and conduct UC media briefings, interviews, and tours
- Develop presentation documentation such as charts, maps and graphics to support both response operation and media briefings
- During major and Offshore oil spill incidents (e.g. Deepwater Horizon), ensure that public affairs policy dictates that information provided to the media on flow rate is based only on fact and not conjecture. In the absence of factual information, public affairs policy should ensure that information providers acknowledge the uncertainty and efforts to obtain reliable information
- Resolve conflicting information and identify media concerns to the Unified Command

- Implement and manage the Public Affairs Staff needed to proactively accomplish Public Affairs tasking
- See also Section 2300 Information Officer

2160.5 Investigation Staff

The responsibilities of the Investigation Staff include:

- Identify and document the source of a discharge and the responsible party
- Secure statements, physical evidence, and samples necessary to establish the cause of a discharge, identify the responsible party
- Gather other information that may be required from the scene of an incident that may be required by the UC, including:
 - (a) the quantity of the discharge;
 - (b) the status of vessels, facilities, or personnel involved in the incident; and
 - (c) evidence of impact, damage or loss.
- Coordinate concurrent investigations and conduct cooperative investigations where appropriate
- Manage the availability of evidence that may be required by separate or divergent investigation
- Inform the Unified Command of the status of investigations
- Implement and manage the Investigation Staff needed to proactively accomplish investigation tasking

2160.6 Legal Staff

The responsibilities of the Legal Staff include providing legal advice to the Unified Command in support of response decision-making.

2200 Health and Safety

The **Safety Officer** (SOFR) is responsible for monitoring and assessing hazardous and unsafe situations, and developing measures for assuring personnel safety. The SOFR will correct unsafe acts or conditions through the established line of authority, although the SOFR may exercise emergency authority to stop or prevent unsafe acts when immediate action is required.

The SOFR maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan and all safety messages with the IAP. See also Section 9750.1 ICS 208 - Site Safety Plan (SSP) Template for additional information.

A job aid for the SOFR can be found at <https://homeport.uscg.mil/ics>. The U.S. Coast Guard Incident Management Handbook (IMH) provides guidance on implementing the Incident Command System (ICS) and related positions.

The SOFR may assemble a team of Assistant Safety Officers and Safety Observers as/if the response becomes more complex. These additional personnel are assigned to specific components of the response to monitor complex and/or hazardous activities associated with that specific component. These additional personnel may include:

- OSRO Safety Observer
- Dive Team Safety Observer
- Salvage Safety Observer

Regardless of the make-up or size of the Safety Team, there is only one assigned Safety Officer responsible to ensure all support (operations oversight) and administrative (plans/briefs) activities are conducted.

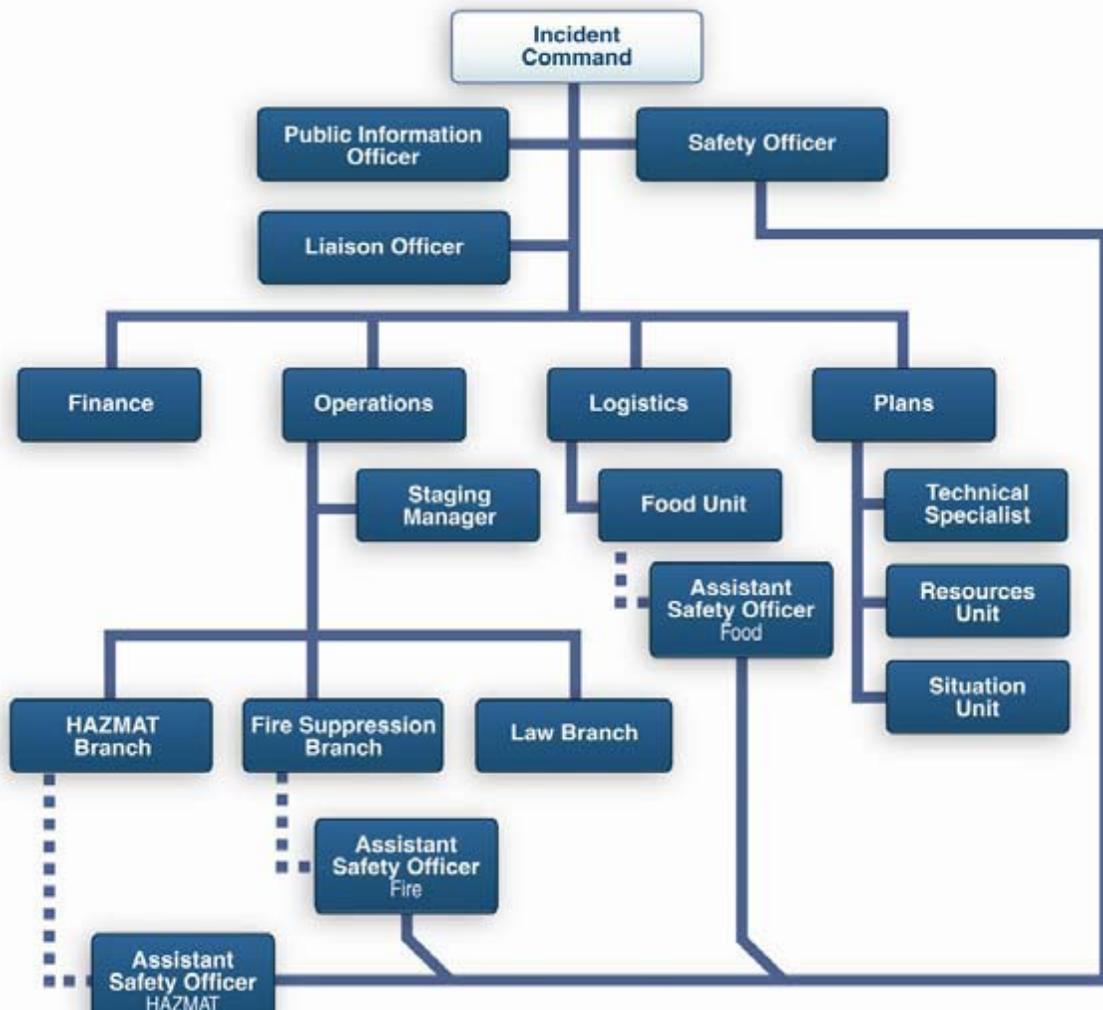


FIGURE 2200-1 Safety Officer and Potential Assistant Safety Officer Assignments

2201 Safety Regulations

All government employees and contract personnel involved in oil spill response activities must comply with all applicable worker health and safety laws and regulations. The primary federal regulations are the Occupational Safety and Health Administrations (OSHA) standards for hazardous waste operations and emergency response found in 29 CFR 1910.120. This rule regulates the safety and health of employees involved in cleanup operations at uncontrolled hazardous waste sites being cleaned up under government mandate and in certain hazardous waste treatment, storage, and disposal operations conducted under the Resource Conservation and Releases Recovery Act of 1976 (RCRA). The regulations also apply to both emergency response and post emergency cleanup of hazardous substances. The definition of hazardous substance used in these regulations is much broader than CERCLA, encompassing all CERCLA hazardous substances, RCRA hazardous waste, and all DOT hazardous materials listed in 49 CFR Part 172. Thus, most oil and oil spill responses are covered by these regulations. The rules cover employee protection during initial site characterization analysis, monitoring activities, materials handling activities, training, and emergency response.

OSHA classifies an area impacted by oil as an uncontrolled hazardous waste site. However, the regulations do not automatically apply to an oil spill cleanup. There must be an operation that involves employee exposure or the reasonable possibility for employee exposure to safety or health hazards. A typical beach cleanup worker collecting tar balls of weathered oil or deploying sorbents to collect a sheen may not be exposed to a safety or health risk. The role of the site safety and health supervisor is to assess the site, determine the safety and health hazards present, and determine if OSHA regulations apply. If an OSHA field compliance officer is on-scene, he or she should be consulted to determine the applicability of OSHA regulations. Disputes should be referred to the Department of Labor representative on the RRT. The individual making the site characterization should communicate the hazards associated with the spill, and provide recommendations for the protection of workers' safety and health through a site safety plan. The responsibility for the health and safety of personnel supporting a pollution response mission ultimately rests with the FOSC.

2202 Training Requirements

Training for emergency response employees shall be completed before they are called upon to perform in real emergencies. Such training shall include the elements of the emergency response plan, standard operating procedures the employer has established for the job, the personal protective equipment to be worn, and procedures for handling emergency incidents.

Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new

responders shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident.

OSHA has recognized the need to remove oil from the environment and has empowered the OSHA representative to the RRT to reduce the training requirement to a minimum of 4 hours for responder engaged in post emergency response operations. An example of a post emergency response effort is shoreline cleanup operations. The reduced training applies to all Coast Guard personnel and to the private sector. This information may be found in OSHA Instruction CPL 2-2.51. The level of training required depends on the potential for exposure. Workers required to use respirators must have 40 hours of off-site training. The OSHA field compliance officer should be contacted to ascertain the worker training requirements and develop an implementation plan to minimize the hazards of exposure to workers involved in cleanup operations. Training requirements may vary from State to State. State requirements that are more restrictive will preempt Federal requirements. The FOSC should establish contact with the State OSHA representative, where applicable, to determine the State training requirement for oil spill response.

2210 Site Characterization

Prior to sending responders into the scene of a release of oil or hazardous substances, a site characterization and analysis should be performed by a safety professional to determine the hazards that first responders may face at the incident scene. The site should be characterized by utilizing the following in accordance with 29 CFR 1910.120:

(1) *Preliminary evaluation.* A preliminary evaluation of a site's characteristics shall be performed prior to site entry by a qualified person in order to aid in the selection of appropriate employee protection methods prior to site entry. Immediately after initial site entry, a more detailed evaluation of the site's specific characteristics shall be performed by a qualified person in order to further identify existing site hazards and to further aid in the selection of the appropriate engineering controls and personal protective equipment for the tasks to be performed.

(2) *Hazard identification.* All suspected conditions that may pose inhalation or skin absorption hazards that are immediately dangerous to life or health (IDLH), or other conditions that may cause death or serious harm, shall be identified during the preliminary survey and evaluated during the detailed survey. Examples of such hazards include, but are not limited to, confined space entry, potentially explosive or flammable situations, visible vapor clouds, or areas where biological indicators such as dead animals or vegetation are located.

(3) *Required information.* The following information to the extent available shall be obtained by the employer prior to allowing employees to enter a site:

- (a) Location and approximate size of the site
- (b) Description of the response activity and/or the job task to be performed

- (c) Duration of the planned employee activity
- (d) Site topography and accessibility by air and roads
- (e) Safety and health hazards expected at the site
- (f) Pathways for hazardous substance dispersion
- (g) Present status and capabilities of emergency response teams that would provide assistance to hazardous waste clean-up site employees at the time of an emergency
- (h) Hazardous substances and health hazards involved or expected at the site, and their chemical and physical properties

(4) *Personal protective equipment.* Personal protective equipment (PPE) shall be provided and used during initial site entry in accordance with the following requirements:

(a) Based upon the results of the preliminary site evaluation, an ensemble of PPE shall be selected and used during initial site entry which will provide protection to a level of exposure below permissible exposure limits and published exposure levels for known or suspected hazardous substances and health hazards, and which will provide protection against other known and suspected hazards identified during the preliminary site evaluation. If there is no permissible exposure limit or published exposure level, the employer may use other published studies and information as a guide to appropriate personal protective equipment

(b) If positive-pressure self-contained breathing apparatus is not used as part of the entry ensemble, and if respiratory protection is warranted by the potential hazards identified during the preliminary site evaluation, an escape self-contained breathing apparatus of at least five minute's duration shall be carried by employees during initial site entry.

(c) If the preliminary site evaluation does not produce sufficient information to identify the hazards or suspected hazards of the site, an ensemble providing protection equivalent to Level B PPE shall be provided as minimum protection, and direct reading instruments shall be used as appropriate for identifying IDLH conditions. (See Appendix B for a description of Level B hazards and the recommendations for Level B protective equipment.)

(d) Once the hazards of the site have been identified, the appropriate PPE shall be selected and used in accordance with paragraph (g) of this section.

(5) *Monitoring.* The following monitoring shall be conducted during initial site entry when the site evaluation produces information that shows the potential for ionizing radiation or IDLH conditions, or when the site information is not sufficient reasonably to eliminate these possible conditions:

(a) Monitoring with direct reading instruments for hazardous levels of ionizing radiation.

(b) Monitoring the air with appropriate direct reading test equipment (i.e., combustible gas meters, detector tubes) for IDLH and other conditions that may cause death or serious harm (combustible or explosive atmospheres, oxygen deficiency, toxic substances).

(c) Visually observing for signs of actual or potential IDLH or other dangerous conditions.

(d) An ongoing air monitoring program in accordance with paragraph (h) of this section shall be implemented after site characterization has determined the site is safe for the start-up of operations.

(6) *Risk identification.* Once the presence and concentrations of specific hazardous substances and health hazards have been established, the risks associated with these substances shall be identified. Employees who will be working on the site shall be informed of any risks that have been identified. In situations covered by the Hazard Communication Standard, 29 CFR 1910.1200, training required by that standard need not be duplicated.

(7) *Employee notification.* Any information concerning the chemical, physical, and toxicological properties of each substance known or expected to be present on site that is available to the employer and relevant to the duties an employee is expected to perform shall be made available to the affected employees prior to the commencement of their work activities. The employer may utilize information developed for the hazard communication standard for this purpose.

Additional guidance for site characterization can be found in the NIOSH/OSHA/USCG/EPA *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities* (aka the Four Agency Guide). Information collected while characterizing the site should be used to develop a Site Safety Plan (SSP).

2220 Site Safety Plan Development

A Site Safety Plan, which establishes policies and procedures to protect workers and the public from the potential hazards posed by a hazardous waste site, must be developed before site activities can precede. The Site Safety Plan must provide measures to minimize accidents and injuries that may occur during normal daily activities or during adverse conditions such as hot or cold weather. Development of a written Site Safety Plan helps ensure that all safety aspects of site operations are thoroughly examined prior to commencing field work. The Site Safety Plan should be modified as needed for every stage of site activity. Because planning requires information, planning and site characterization should be coordinated. The Site Safety Plan is intended to meet the requirements of the Hazardous Waste Operations and Emergency Response regulation (Title 29, Code of Federal Regulations, Part 1910.120).

An initial Site Safety Plan should be developed so that the preliminary site assessment can proceed in a safe manner. The ICS-208 Site Safety Plan, Form A – Emergency Safety and Response Plan, may be used for this purpose. The information from this assessment can then be used to refine the Site Safety Plan so that further site activities can proceed safely. Plans should be revised whenever new information about site hazards is obtained. Development of a Site Safety Plan should involve both the offsite and onsite management

and be reviewed by occupational and industrial health and safety experts, physicians, chemists, or other appropriate personnel.

To ensure that the Site Safety Plan is being followed, the Safety Officer or designated assistants should conduct a safety meeting prior to initiating any site activity and before and after each work day. The purpose of these safety meetings are to:

- Describe the assigned tasks and their potential hazards;
- Coordinate activities;
- Identify methods and precautions to prevent injuries;
- Plan for emergencies;
- Describe any changes in the Site Safety Plan;
- Get worker feedback on conditions affecting safety and health;
- Get worker feedback on how well the Site Safety Plan is working.

The Site Safety Officer should also conduct frequent inspections of site conditions, facilities, equipment, and activities to determine whether the Site Safety Plan is adequate and being followed.

The ICS-208 Site Safety Plan and sample plans can be found at <https://homeport.uscg.mil/ics>.

2230 Operational Risk Management (ORM)

2230.1 ORM Terms

Operational Risk Management (ORM): A continuous, systematic process of identifying and controlling risks in all activities according to a set of pre-conceived parameters by applying appropriate management policies and procedures. This process includes detecting hazards, assessing risks, and implementing and monitoring risk controls to support effective, risk-based decision-making.

Risk: The chance of personal injury or property damage or loss, determined by combining the results of individual evaluations of specific elements that contribute to the majority of risk concerns. Risk generally is a function of severity and probability. The model in this instruction, however, singles out exposure as a third risk factor.

Severity: An event's potential consequences in terms of degree of damage, injury, or impact on a mission.

Probability: The likelihood an individual event will occur.

Exposure: The amount of time, number of cycles, number of people involved, and/or amount of equipment involved in a given event, expressed in time, proximity, volume, or repetition.

Mishap: An unplanned single or series of events causing death, injury, occupational illness, or damage to or loss of equipment or property.

Hazard: Any real or potential condition that can endanger a mission; cause personal injury, illness, or death; or damage equipment or property.

Risk Assessment: The systematic process of evaluating various risk levels for specific hazards identified with a particular task or operation. Various models are available to complete this step in the ORM process.

Risk Rating Scale: A scale of specific risk degrees, determined during the ORM process's risk assessment step. Various response communities and activities should use the safety industry's standard terms low, medium, and high when discussing risk across program lines. However, each community will define low, medium, and high risk in terms meaningful to its own personnel.

GAR Model: A scale of specific risk values, when after calculating, yields results that align with the Green (low), Amber (medium), or Red (High) risk categories. These categories provide the team member with an opportunity to anticipate the risk associated with a specific task and alter contributing factors in order to decrease the final score.

2230.2 ORM Process

The ORM process:

- Is a decision making tool people at all levels use to increase operational effectiveness
by anticipating hazards and reducing the potential for loss, thereby increasing the probability of a successful mission.
- Advocates harnessing feedback and input from all organizational levels to make the most informed decisions possible.

- Exists on three levels: time-critical, deliberate and strategic. Risk decisions must be made at levels of responsibility that correspond to the degree of risk, considering the mission significance and the timeliness of the required decision.
- The use of risk management principles can be as simple as addressing the weather before driving without any formal written ORM models, or can be as complex as having a safety brief before executing a complex hazardous materials mission, salvage project, or confined space entry.

2230.3 ORM Decision-Making Principles

Apply these basic decision-making principles before executing any anticipated job, action or mission. As an operation progresses and evolves, personnel should continuously employ risk management principles during the decision-making process:

(1) **Accept no Unnecessary Risk:** All response operations and daily routines entail risk.

Unnecessary risk conveys no commensurate benefit to safety of a mission. The most logical courses of action for accomplishing a mission are those meeting all mission requirements while exposing personnel and resources to the lowest possible risk. ORM provides tools to determine which risk or what degree of risk is unnecessary.

(2) **Accept Necessary Risk When Benefits Outweigh the Costs:** Compare all identified benefits to all identified costs. The process of weighing risks against opportunities and benefits helps to maximize unit capability. Even high-risk endeavors may be undertaken when decision-makers clearly acknowledge the sum of the benefits exceeds the sum of the costs. Balancing costs and benefits may be a subjective process open to interpretation. Ultimately, the appropriate decision authority may have to determine the balance.

(3) **Make Risk Decisions at the Appropriate Level:** Depending on the situation, anyone can make a risk decision. However, the appropriate level to make those decisions is that which most effectively allocates the resources to reduce the risk, eliminate the hazard, and implement controls. Commanders at all levels must ensure subordinates are aware of their own limitations and when subordinates must refer a decision to a higher level.

(4) **ORM is just as critical in executing as in planning all activities:** While ORM is critically important in an operation's planning stages; risk can change dramatically during an actual mission. Every event requires risk to be maintained within acceptable boundaries (e.g., slowing to a safe speed in foggy conditions). Keeping risk in check is therefore very important and a systematic approach to minimize risk should include addressing these tasks:

(a) **Define the mission tasks** by reviewing current and planned operations describing the mission at hand. To assist with this step, construct a list or chart depicting major phases of the operation or task. Further break down the operation or task into “bite-size” pieces, while maintaining a big-picture awareness of the relationships among the pieces;

(b) **Identify and define the potential hazards.** The key to successfully analyzing risk is carefully defining the hazard. This step involves identifying those things that are “potential failures,” or things that can go wrong. To ensure effective hazard identification, the basic categories of equipment, environment, and personnel should be considered;

(c) **Assess the risks** of the hazards identified in relation to the unit and the mission.

Individual risk levels must be identified for each specific hazard. Risk assessment is conducted by evaluating specific elements or factors, that when combined, define risk. This risk level must be understood by all as it applies to the task or mission. To assess risk, a Green, Amber, Red (GAR) Model or a Severity, Probability, Exposure (SPE) model may be generated (see procedure below for explanation and use). To avoid potential controversy, consider in advance both the perceived and expected value of a loss;

(d) **Identify hazard control options** that may reduce risk. Starting with the highest risk hazards assessed in the above steps, identify as many risk controls options or safeguards as possible. Determine each option’s impact on mission and unit goals and select the best alternative or combination of alternatives. Risk control options include: Spread out, Transfer, Avoid, Accept, and Reduce (STAAR). Effective risk management strategies address the risk’s components of severity, probability, and exposure, and include engineering controls; training, safe work practices, and other administrative controls; and personal protective equipment.

(e) **Evaluate risk vs. gain** and determine if benefits of the operation outweigh the risks. If risks outweigh gains, re-examine control options for new or modified controls. If that fails, inform the next level in the chain of command and request assistance with implementing additional controls, modifying or canceling the mission, or accepting the identified risks. All responders share responsibility for the risks taken by the team or asset. A team discussion to understand the risks and how they will be managed is the most important component of the evaluation, not the ability to assign numbers or colors.

(5) **Execute decision and take action.** This may mean increasing, replacing, or reassigning resources (i.e., people, equipment, and/or information), and ensuring the risk controls are known by all and enforced.

(6) **Monitor situation.** Risk management is a continuous process and must be monitored to achieve success. Anticipate and respond to changes in situations and return to step #1, or reassess risk to ensure that all risks have been mitigated or addressed.

2230.4 SPE Risk Assessment Model

The SPE Model assesses risks for specific hazards. In this model, Risk = Severity x Probability x Exposure. Each area is given an overall number one through five and multiplied together. This final product is then correlated with a set of values that assign risk; 1-19 (slight), 20-39 (possible); 40-59 (substantial); 60-79 (high); 80-100 (very high). Attention is needed for possible risk, and action is required for substantial and high risk.

2230.5 GAR Risk Assessment Model

We can address more general risk concerns, involving planning operations or reassessing risks as we reach milestones within our plans, by using the GAR model. Often used in cutter or small boat operations, these elements can also be applied to other NSF response operations as well. These elements include:

- (1) Supervision;
- (2) Planning;
- (3) Team selection;
- (4) Team fitness;
- (5) Environment; and
- (6) Event complexity.

To determine the GAR model risk color (e.g., red equals high risk, amber equals caution, and green equals low risk), assign a risk code of 0 (no risk) through 10 (maximum risk). Add the individual risk numbers and compare the color chart.

Low risk (Green) is between 0 and 23;

Caution (Amber) is between 23 and 44; and
High Risk (Red) is 45 to 60.

The GAR model incorporates the following elements:

(1) **Supervision:** Supervisory control should consider how qualified a supervisor is and his or her level of involvement in the evolution. Even if a person is qualified to perform a task, effective supervision further minimizes risk. The higher the risk, the more a supervisor needs to focus on observing and checking. A supervisor actively involved in another task can be distracted easily and may not be an effective safety observer.

(2) **Planning:** Preparation and planning should consider how much information is available, how clear it is, and how much time is available to plan the evolution or evaluate the situation.

(3) **Personnel Selection:** Personnel selection should consider the experience of the persons performing the specific event or evolution. If an individual is replaced during the event or evolution, assess the new team member's experience.

(4) **Personnel Fitness:** Personnel fitness should judge the team members physical and mental state, generally a function of how much rest they have had. Quality of rest should consider how a platform rides and its habitability, potential sleep length, and any interruptions. Fatigue normally becomes a factor after 18 hours without rest; however, lack of quality sleep builds a deficit that worsens the effects of fatigue.

(5) **Environment:** Environment should consider all factors affecting personnel, unit, or resource performance, including time of day, lighting, atmospheric and oceanic conditions, chemical hazards, and proximity to other external and geographic hazards and barriers, among other factors.

(6) **Event or Evolution Complexity:** Event or evolution complexity considers both the time and resources required to conduct an evolution. Generally, the longer the exposure to a hazard, the greater the risks involved. For example, more iterations of an evolution can increase the opportunity for a mishap. However, depending on the team's experience, it may improve their proficiency and decrease the chance of error. Other factors to consider in this element include how long the environmental conditions will remain stable and the precision and level of coordination needed to conduct the evolution.

(7) **Calculating Risk:** To compute the total degree of risk for each hazard previously identified, assign a risk code of 0 for no risk through 10 for maximum risk to each of the six elements. Add the risk scores to come up with a total risk score for each hazard.

If the total risk value falls within the green zone (0-23), the risk is rated low. A value in the amber zone (24-44) indicates moderate risk; consider adopting procedures to minimize it. If the total value falls within the red zone (45-60), implement measures to reduce the risk and reevaluate before starting the event or evolution.

The GAR model is an effective tool used to assess the overall degree of risk for an operation or mission. If the degree of risk appears unusually high in one or more of the elements, perform a second assessment using the SPE model for each element of concern, since the SPE model is more specific. Rank-order all hazards assessed in the GAR model from the highest to the lowest risk to target areas of greatest concern first.

2230.6 ORM Implementation

The SOFR should ensure that the ORM process is utilized by all responders and reinforce its use whenever possible (i.e. tailgate meetings, operations briefings, etc). ORM models shall be implemented at the initiation of a response and during significant changes within operations.

The ICS-215A Hazard/Risk Analysis Worksheet implements both SPE and GAR models and may be used during a response utilizing ICS. A downloadable version of the form may be found at <https://homeport.uscg.mil/ics>.

2300 Information Officer

When an incident occurs, it is imperative to give the public prompt, accurate information on the nature of the incident and the actions underway to mitigate the damage. The Federal On-Scene Coordinator (FOSC) and community relations personnel should ensure that all appropriate public and private interests are kept informed and that their concerns considered throughout a response. The FOSC (or community relations personnel) should coordinate with available public affairs/community relations resources to carry out this responsibility by establishing, as appropriate, a Joint Information Center bringing together resources from federal and state agencies and the responsible party (40 CFR 300.155).

The Information Officer is responsible for developing and releasing information about the incident to the news media, incident personnel, and to other appropriate agencies and organizations.

The responsibilities of the Information Officer include:

Implement and manage the Information Management Staff needed to facilitate the availability of response information in the UC.

Coordinate information management system within the UCS to ensure the proper routing and availability of response information.

Coordinate standard information display systems, status boards, summary forms, and

other methods to effectively manage response information.

NOTES: (1) During the first three operational periods it is recommend embedding field observers/liaisons in the Planning and Operations Sections to relay timely and accurate response information to the JIC organization.

(2) JIC field observers/liaisons should compare various status boards for concurrent situational information. If conflicts are noted, immediately notify the appropriate Unit Leader or Section Chief to clarify.

A job aid for the Public Information Officer can be found at <https://homeport.uscg.mil/ics>. The U.S. Coast Guard Incident Management Handbook (IMH) provides guidance on implementing the Incident Command System (ICS) and related positions.

2310 JIC (Joint Information Center)

An initial site for the JIC should be quickly designated to expedite the set-up and the rapid dissemination of initial incident information.

The location of an oil spill or hazardous substance release cannot be pre-determined because the Area Contingency Plan encompasses a vast area of potential locations. The initial site of the JIC for any oil or hazardous materials spill may be located at the offices of the Federal On-Scene Coordinator (FOSC).

For incidents occurring in waters of Mississippi and Alabama under the jurisdiction of Sector Mobile, the initial JIC can be established at:

USCG 1500 Mobile, Phone: (251) Fax: (251) 441-6169	Sector 15 th AL.	Mobile St. 36615-1390 441-5196
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For incidents occurring in waters of Northwest Florida under the jurisdiction of Marine Safety Office Mobile, the initial JIC can be established at:

USCG Panama Panama Phone: (850) Fax: (850) 230-1937	Detached City,	Duty City,	Office FL.	Panama FL.	City 1700 32407 234-1957
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The Sector or DDO's Media Relations Officer or Public Affairs Officer should invite public affairs representatives of each Command organization (Federal, State and RP) to respond at the initial JIC location and/or remain in frequent telephone and fax communication to coordinate information activities.

2320 Family Relations

Any incident may raise concerns among family members about the safety of employees, contractors, vessel crew or passengers, affected community residents, and even responders to the incident.

In general, such inquiries should be directed to the public affairs representative of the organization where the family member is employed. Inquiries about a facility or vessel crewmember should be directed to the Responsible Party, while inquiries about a Coast Guard responder should be directed to the Coast Guard.

Media or family inquiries concerning the identification of any fatality should be referred to the Medical Examiner or Justice of the Peace of the county where the death occurred.

Family inquiries concerning the identification or condition of any injuries should be referred to the Patient Care Coordinator or Nursing Supervisor of the hospital where the injured is being treated.

In the case of multiple fatalities, the Medical Examiner or Justice of the Peace should be invited to provide an agency representative to coordinate response activities with the Liaison Officer and/or a public affairs representative to coordinate information activities with the Investigations Officer (IO).

In the case of multiple injuries treated at multiple hospitals, each hospital should be invited to provide an agency representative to coordinate response activities with the Liaison Officer and/or a public affairs representative to coordinate information activities with the IO. The IO may assign an Assistant Information Officer and/or other JIC staff member(s) to coordinate family relations activities with the Responsible Party and appropriate agency representatives.

The American Red Cross can coordinate and manage family support services such as crisis and grief counseling, transportation, housing, meals, child care services for families that bring young children, and cost accounting to provide such family support services. The point of contact for Alabama is (251) 436-7910, Mississippi (228) 896-4511, Northwest Florida (850) 438-9971.

In the case of an airline, marine vessel, railroad or other transportation incident involving a “significant” number of fatalities or injuries, other directives should be referenced. Presidential Executive Memorandum on “Assistance to Families Affected by Aviation and Other Transportation Disasters” (September 9, 1996) as well as Public Law 104-264 “Family Assistance Act of 1996” may apply.

This law and presidential directive has assigned the Director, Family Support Services, of the National Transportation Safety Board (NTSB) to coordinate the integration of local, state, federal, responsible party, and other organization’s resources to provide family support services. Such services may include family transportation and logistical support, psychological counseling, victim identification and forensic services, daily briefings to families on the progress of recovery and identification, communicating with foreign governments, and providing translation services as may be required. The point of contact is the Director, Family Support Services, NTSB at (202) 314-6185 or the NTSB Communications Center at (202) 314-6290.

Upon activation of this Federal Response Plan for a major transportation disaster, the Federal Emergency Management Agency (FEMA) has been tasked to provide FEMA personnel to assist in public information dissemination. This assistance includes establishing and staffing external media support centers such as the incident site, family support operations center, and other areas that may attract media interest. The regional point of contact is the FEMA Region IV at (770) 220-5200.

2320.1 News Release

As soon as possible, the IO should prepare a News Advisory identifying the IO (or JIC, if established) as the official source of information about the incident. By definition, “news advisory” contains information solely for the news media to plan their story coverage. A news advisory is not for broadcast, publication, or release to the public.

If initial incident information is readily available, the News Advisory should be accompanied by a News Release written in “bullet point” or Fact Sheet format summarizing the key facts about the incident. The time required to compile, write, and obtain Command approval of such a Fact Sheet will be substantially faster than needed to produce a narrative News Release.

As time permits, a more detailed news release should be prepared describing the incident, identifying the Responsible Party and response agencies, containment and cleanup efforts, future plans and other details as necessary. An updated news release or fact sheet should be prepared for distribution at each news conference or media briefing. By definition, a “news release” is information for broadcast, publication, and release to the public at the time identified on the news release.

Each media advisory, fact sheet, and news release should be approved by the organization’s Incident Commander or On Scene Coordinator (if speaking only for that organization) or by

Unified Command (if issued as a joint news release.) Pre-approval is also required for posting any information on a website. Approval authority may be delegated by Command to the IO.

These written products should be faxed to the major media outlets, government agencies, and external organizations listed in Section 9000 and other media outlets that have inquired about the incident. Sector Mobile, DDO Panama City, and USCG District 8 Public Affairs have these lists pre-programmed into their broadcast fax systems. Coordination will be required among federal, state and RP information specialists to minimize duplicative faxes that can create transmission bottlenecks and indirectly weaken the joint information message. Photocopies should be provided to all Command Staff and Section Chiefs and any other key players who may end up speaking with the media such as the Coast Guard Sector Duty Officer.

Updated fact sheets or news release should be prepared at regular intervals until the incident has been concluded or there is no more media interest. Distributing such updates by 0500, 1000, 1500, and 2000 hours will place timely information in the hands of the media to meet radio, television, and newspaper deadlines. For a small incident, once-a-day updates by 1500 hours or twice-a-day updates by 0500 and 1500 hours may be sufficient. (*See following pages for sample news release, fact sheet and advisory.*)

2320.2 News Advisory Example

NEWS ADVISORY #1

(Name of Incident)

Issued December 11, 1999 at 10 a.m.

For more information, contact:

(Information Officer)

Joint Information Center

(xxx) xxx-xxxx

JOINT INFORMATION CENTER NOW OPEN

The U.S. Coast Guard in cooperation with the list agencies opened a Joint Information Center (JIC) to communicate information about the (name of incident).

The JIC was established at U.S. Coast Guard Sector Mobile located at Brookely Complex, South Broad Street, Mobile, Alabama.

The purposes of the JIC are:

1. Compile the latest, most accurate incident information,
2. Answer questions from the media and the public,
3. Verify and correct any rumors about the incident,
4. Schedule media tours, interviews, & joint news conferences.

A news conference has been scheduled for _____ at the _____.

Parking for media vehicles is available at the facility in the parking lot north of the main building.

News media representatives should bring proper media credentials issued by local or state law enforcement agencies for access to media areas of the JIC.

All media and public inquiries about the incident should be directed to the JIC. The JIC will be staffed 24 hours.

-end-

Additional contacts: (Phone numbers optional if working JIC.)

(Name and rank), USCG (xxx) xxx-xxxx

(Name and title), RP (xxx) xxx-xxxx

(Name and title), (xxx) xxx-xxxx

2320.4 News Release Example

NEWS RELEASE #1

(Name of Incident)

Issued December 11, 1999 at 11 a.m.

For more information, contact:

(Information Officer)

Joint Information Center

(xxx) xxx-xxxx

UNIFIED COMMAND LAUNCHES SPILL RESPONSE

MOBILE--The U.S. Coast Guard, Alabama Department of Environmental Management (ADEM), and (RP), established a Unified Command Post in response to a 42,000-gallon oil spill into Mobile Bay Ship Channel from a damaged barge.

At approximately 8:45 this morning, the tugboat Lucky Lady, pushing 6 barges outbound on the Mobile Bay Ship Channel, ran aground near the entrance to the Theodore ship channel. The tugboat and barges, owned by (RP), were transporting crude oil when one of the barges, barge AT-411, suffered a rupture in the #3 port cargo tank. No injuries have been reported.

The Coast Guard has restricted vessel traffic on the Mobile Bay Ship Channel below the Theodore Ship Channel until further notice.

The Coast Guard Federal On-Scene Coordinator (FOSC) and the State on-Scene Coordinator (SOSC) are working with (RP) ensuring cleanup efforts are underway. (RP) activated its Spill Management Team and mobilized cleanup personnel and equipment from ABC Responders and XYZ Incorporated.

Two oiled egrets were sighted near Galliard Island. The U.S. Fish and Wildlife service and Alabama Department of Environmental Management will set up a wildlife rehabilitation trailer on Deer River Point. The oiled bird wildlife number is (251) xxx-xxxx.

The cause of the incident is under investigation.

-end-

Additional contacts: (Phone numbers optional if working JIC.)

LT Jane Smith, USCG (xxx) xxx-xxxx

Mr. John Doe, RP (xxx) xxx-xxxx

Ms. Anne Wilson, ADEM (xxx) xxx-xxxx

2330 Media Contacts

When an incident occurs, it is imperative to give the public prompt, accurate information on the nature of the incident and the actions underway to mitigate the damage. OSC's /RPM's and community relations personnel should ensure that all appropriate public and private interests are kept informed and that their concerns are considered throughout a response. They should coordinate with available public affairs /community relations resources to carry out this responsibility by establishing, as appropriate, a Joint Information Center bringing together resources from federal and state agencies and the responsible party.

During major and Offshore oil spill incidents (e.g. Deepwater Horizon), public affairs policy dictates that information provided to the media on flow rate is based only on fact and not conjecture. In the absence of factual information, public affairs policy should ensure that information providers acknowledge the uncertainty and efforts to obtain reliable information.

2330.1 City Government Offices

During an incident, determine the county(s) that could be impacted by the spill. Contact that county's Emergency Management Coordinator to determine if the spill could impact unincorporated areas under the county's jurisdiction, or if the spill could impact areas under the jurisdiction of one or more incorporated cities.

If one or more cities might be impacted, ask the county Emergency Management Coordinator for the name, title, phone, and fax number of each impacted city's Emergency Management Coordinator, Environmental Health Supervisor, or other appropriate municipal contact person.

The appropriate city and county officials should be added to the fax distribution of all news releases about the spill, and should be invited to send a city or county public affairs official to the Joint Information Center to serve as a local Information Officer.

2340 Protocol for Access / Timing of Media Briefings

The FOSC is the sole release authority for official statements concerning federal cleanup actions. All official statements shall be approved by the FOSC. The goals of all public information efforts in pollution response are to keep the community informed of potential threats to people or the environment; informed of the status of cleanup operations; and to replace rumor with facts. These goals must be met by avoiding speculation, release of inaccurate information, or other actions which could jeopardize the rights of any party involved in the spill.

The key to successful public affairs in pollution response is advance planning and rapid implementation. The PIO should develop guidance for the following:

- (1) Release procedures to be followed by the public affairs personnel assigned to an FOSC:
 - (a) Prepare periodic comprehensive news release updates for FOSC approval.
 - (b) Respond factually to all media inquiries as they are received.
 - (c) Conduct media and community relations programs.

- (2) Guidelines for responders when dealing with reporters on-scene:
 - (a) Responders should understand that they may be perceived as official spokespersons.
 - (b) Individuals may explain to reporters what their specific jobs are.
 - (c) Media questions which do not pertain to an individual's job should be referred to the PIO.

- (3) Release procedures/relationships between Area Command, if established, and FOSC:
 - (a) Procedures must be established to ensure that all information released pertaining to the cleanup is approved by the FOSC regardless of the geographic location of the person making the release.

- (4) Coordination with other agencies.
- (5) Request additional public affairs support as needed.

Information concerning Natural Resource Damage Assessment (NRDA) activities shall be coordinated through lead administrative trustee.

2340.1 Press Releases

It is the policy of the MOB Area Committee to quickly issue a press release regarding the nature of the incident and any response efforts being initiated. The release also serves to establish the FOOSC's Public Information Officer as the response's primary media contact. Future releases and announcements should be coordinated through the Unified Command with appropriate approvals. All press releases should have sequence numbers (i.e. *Incident Name* Release #1), contact numbers for all appropriate parties, date, and time issued.

The initial press release should convey:

- If an Incident Command (Post) has been established;
- Which agencies are involved in response;
- The location, time, and additional confirmed information about the incident, to include the type of pollution and how far away the incident is from shore;
- Whether volunteers are being sought at this time;
- If volunteers are sought, who should they contact for more information; and
- Phone number and website for media inquiries.

2340.2 In-Person Press Releases

The PIO must decide what interview format is most appropriate: individual interviews or briefing an entire group. PIOs will report verified information only and not speculate on cause or quantities. A media advisory should be sent out in advance of the press conference to help maximize media attendance.

The following items should be considered when setting-up for a press conference:

- Work with spokespersons to agree upon key messages
- Determine venue for media conference
- Issue an advisory alerting media as to time/place
- Be sure to notify appropriate management/spokespersons
- Check on sufficient electrical outlets/accessibility
- Parking arrangements
- Identify location for individual interviews afterward
- Prepare media kits, if required

- Set up site - chairs, audiovisuals, etc.
- Tape recorder to document the conference or for playback to personnel who couldn't attend
- "Unified Command" logo for backdrop visual, if appropriate

- Security (not in uniform)
- Check credentials of media attending and sign in
- Request that beepers and cellular phones be turned off as a courtesy to others recording, videotaping
- Brief media prior to main presenters arrival
- Establish time limitations with media before main presenters arrive
- Explain that for the sake of time, reporters will be limited to one question until others have had a chance to ask their own (an exception may be clarifying follow-up questions)
- Ensure the opening remarks of presenters are brief and focused

2340.3 Telephone Press Conferences

The following items should be considered when setting-up for a telephone press conference:

- Work with spokespersons to agree upon key messages
- Determine time of event
- Arrange for moderated conference call
 - Ensure ample number of participant lines (for reporters), and lines for leaders (Spokespersons/PIO)
 - Select password or passcode for call leaders (spokespersons/PIO) and participants (reporters)
 - Determine if you want the call to be recorded for archive purposes
 - Schedule pre-press conference call one hour earlier with call leaders (spokespersons and PIO) to go over messaging and call format
 - Have press conference call moderated by operator
 - Call participants (reporters) must have passcode/password, and identify themselves by name and news outlet. Reporters' information will be provided to call leader at end of press conference
 - Reporters to be placed on mute until end of initial presentation, at which time they may request to ask questions.
- Issue an advisory alerting media as to time of the telephone press conference; determine if the media advisory will include the passcode/password, or if reporters must contact the PIO for such information
- Be sure to notify appropriate management/spokespersons
- Once press conference starts, brief participants on the format and introduce spokespersons
- Ensure the opening remarks of presenters are brief and focused

2340.4 Town Meetings

Unified Command should give careful consideration as to whether a town meeting has value for a specific incident. The town meeting is for directly addressing concerns of members of the community. It is important to allow them an opportunity to express those concerns. In many instances, the community is not as interested in the type of mechanical response being used to clean up the oil as they are in what's being done to resolve the problems caused by the oil. Town meetings allow for face-to-face communication between the Liaison Officer (LNO) and community members and leaders. They are intended to provide an opportunity for the community to have its concerns heard and to help educate and inform the community about the spill response efforts. They can, however, turn into media events with little value added.

Town meetings are generally of great interest to the media and they should be invited to attend. However, this is not a news conference and media representatives should be requested to cover the event rather than participate in it. The focus of attention should be on community members and their concerns. Reporters can be accommodated following the formal meeting by being provided with one-on-one interviews or other briefings. News packets should also be available for media representatives with up-to-date information and backgrounders on the spill response effort. Panelists participating in the community meeting should be apprised of the fact that reporters may request interviews following the meeting. As appropriate, assistance should be provided to the panelists in preparing for the interviews.

2340.5 Media Logs

A log should be maintained to track inquiries by reporters. Include basic information such as names, news organization, time of call, and information sought. Media requests that require follow up action should be highlighted and assigned to proper personnel to ensure that questions are answered in a timely manner (in consideration of deadlines). The logs will also serve as background information for new members to the JIC during shift changes.

2340.6 Standard Questions Asked by the Media

Experience has shown that the following questions are often asked by the media during press conferences. The answer to all of them should be addressed in the initial statement prior to opening the floor to questions.

- How much oil has spilled?
- Has it been contained?
- What was the cause?
- What time did the incident occur?
- Whose fault was it?
- What is the name and address of the responsible party?
- What is the name and address of the owner/operator?

- Who will assume responsibility for cleanup?
- What's being done to clean it up?
- Were there any injuries?
- Is there any threat to environment?
- Was the ship's captain intoxicated? (tanker incident)
- How would you classify this spill? Large? Small?
- How long will it take to cleanup?
- How much will it cost to cleanup?
- Will people who suffer losses because of the spill be reimbursed?
- How many people will be involved in the response?
- What is the flag of this vessel? What nationality is the crew?
- Will you use dispersants or *in-situ* burning?
- What is the trajectory of the oil? How long before it hits the shoreline?
- Are there aircraft surveillance operations ongoing? How many?
- What wildlife or marine life is being threatened?
- What kind of insurance do you have to cover this?
- What are your biggest fears?
- Is this an environmental disaster?
- How old is this vessel?
- If a tank ship, was it tanker double-hulled?
- When was it last inspected?
- Will the captain and crew be tested for drugs?
- What happens if they test positive for drugs? Will they be fired?
- Are there any other contingencies you are planning for? Is this your worst nightmare?
- If not, what is?

2340.7 External Organizations

These organizations are non-governmental agencies such as non-profit response agencies, industry associations, environmental organizations, and academic institutions that the media and public may contact for validation or additional information during a spill.

Copies of the latest news releases should be faxed to these external organizations so they can respond to questions from the media and public and so they can re-fax the same information to their members, resource personnel, or additional contacts.

Refer to section 9200 for contact information for the following agencies:

- A. AMERICAN RED CROSS
- B. ALABAMA DEPT. OF ECONOMIC AND COMMUNITY AFFAIRS
- C. AUBURN MARINE EXTENSION
- D. BON SECOUR NATIONAL WILDLIFE REFUGE
- F. DAUPHIN ISLAND SEA LAB
- G. WEEKS BAY, NATIONAL ESTUARINE RESEARCH RESERVE
- H. MOBILE BAY NATIONAL ESTUARY PROGRAM

2340.8 News Media Outlets

SELECTION CRITERIA

During an oil spill or hazardous materials release, it would be a very time-consuming and staff-intensive task to individually notify and regularly update all media outlets by telephone or fax, so the following media list has been prioritized to identify:

1. Primary broadcast stations authorized by the Federal Communications Commission to activate the Emergency Alert System (EAS) in case of a life-threatening emergency such as toxic fume release or explosion danger from an oil or chemical spill.
2. Radio, TV, and daily newspapers which both have a full-time news staff with on-scene news capability and reach large general population audiences in the Alabama, Mississippi or Northwest Florida area. Network affiliations are included, so radio and TV affiliates can contact their own networks if the spill is of national media interest.
3. News services which serve as multiple distribution points to other news media outlets which don't meet the #2 criteria above.

Other media outlets, cable TV systems, and business and oil/petrochemical trade publications NOT included in this Contact List may contact the Joint Information Center to request that they be added to the broadcast fax distribution list for news releases about a specific incident.

News releases can be posted on the Internet by 8th District Public Affairs for media and public to access. The 8th District's home page is <http://www.uscg.mil/d8/uscgd8/htm>.

NEWS MEDIA CONTACT LIST - Refer to Section 9200

2350 Homeland Security Information Network (HSIN)

CG District Eight and Sector Mobile will use the Homeland Security Information

Network (HSIN) to manage internal information. HSIN is a national secure and trusted web-based portal for information sharing and collaboration between federal, state, local, tribal, territorial, private sector, and international partners engaged in the homeland security mission.

HSIN is made up of a growing network of communities, called Communities of Interest (COI). COIs are organized by state organizations, federal organizations, or mission areas such as emergency management, law enforcement, critical sectors, and intelligence.

Users can securely share within their communities or reach out to other communities as needed. HSIN provides secure, real-time collaboration tools, including a virtual meeting space, instant messaging and document sharing. HSIN allows partners to work together instantly, regardless of their location, to communicate, collaborate, and coordinate. HSIN offers many dynamic capabilities including:

24/7 availability

Document Libraries

Instant-messaging tool

Web conferencing

Incident reporting

Common Operational Picture (COP) provides situational awareness and analysis

Integrated Common Analytical Viewer (iCAV) gives geographical visualization

Announcements

Discussion Boards

Task Lists

Requests For Information/For Your Information (RFIs/FYIs)

Calendars

Really Simple Syndication (RSS) Feeds

Online training materials

You may obtain an application by sending a request to **HSIN.Outreach@hq.dhs.gov**.

Once nominated, the COI Validating Authority will review your membership application and approve or deny your admission to the COI. If the application is approved, an email will be sent to you with instructions on how to log onto HSIN for the first time.

2400 Liaison Officer

Only one primary Liaison Officer will be assigned for each incident including incidents operating under UC and multi-jurisdictional incidents.

The Liaison Officer may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions.

A job aid for the Liaison Officer can be found at **<https://homeport.uscg.mil/ics>**.

The U.S. Coast Guard Incident Management Handbook (IMH) provides guidance on implementing the Incident Command System (ICS) and related positions.

Major duties of the Liaison Officer are:

Be a contact point for Agency Representatives

Maintain a list of assisting and cooperating agencies and Agency Representatives, including name, and contact information. Monitor check-in sheets daily to ensure that all Agency Representatives are identified.

Assist in establishing and coordinating interagency contacts.

Keep agencies supporting the incident aware of incident status. See also Section 2350 Homeland Security Information Network (HSIN).

Monitor incident operations to identify current or potential inter-organizational problems.

Participate in planning meetings, provide limitations and capability of assisting agency resource.

Coordinate response resource needs for Natural Resource Damage Assessment and Restoration activities with the On-Scene Coordinator during oil and HAZMAT response.

Coordinate response resource needs for incident investigation activities with the On Scene Coordinator.

Coordinate activities of visiting dignitaries.

Ensure that all required agency forms, reports, and documents are completed prior to demobilization.

Brief command on agency issues and concerns.

Have debriefing session with the Incident Commander prior to demobilization.

Maintain Unit Log (ICS 214-CG)

During major and Offshore oil spill incidents (e.g. Deepwater Horizon), information release policy dictates that information provided to the media and other stakeholders on flow rate is based only on fact and not conjecture. In the absence of factual information, ensure that information providers acknowledge the uncertainty and efforts to obtain reliable information.

2410 Investigators

While many if not all spills and releases are marine casualties over which the Coast Guard has jurisdiction under Title 46 Code of Federal Regulations part 4, the National

Transportation Safety Board (NTSB) often investigates accidents resulting in large oil or hazardous substance discharges. Accordingly, relationships between investigators will be governed by the Memorandum of Understanding between the Coast Guard and the NTSB, as well as side-bar agreements on investigation between state and local investigators. The FOSC will normally group the investigation as a separate entity from the response through the Liaison Officer. The Liaison will normally appoint an assistant solely to handle the investigators during a large response or complex investigation; this assistant should immediately contact the Coast Guard's Office of Investigation and Analysis in Washington DC through the Coast Guard chain of command to discuss the details of the investigation/response relationship in the particular case at hand.

2420 Trustees

Trustee means an official of a federal natural resources management agency designated in subpart G of the NCP or a designated state official or Indian tribe or, in the case of discharges covered by the OPA, a foreign government official, who may pursue claims for damages under section 107(f) of CERCLA or section 1006 of the OPA.

Upon notification or discovery of injury to, destruction of, loss of, or loss of use of, natural resources, or the potential for such, resulting from a discharge of oil, the trustees, pursuant to section 1006 of the OPA, are to take the following actions:

- In accordance with OPA section 1006(c), determine the need for assessment of natural resource damages, collect data necessary for a potential damage assessment, and, where appropriate, assess damages to natural resources under their trusteeship; and
- As appropriate, and subject to the public participation requirements of OPA section 1006(c), develop and implement a plan for the restoration, rehabilitation, replacement, or acquisition of the equivalent, of the natural resources under their trusteeship.

When circumstances permit, the FOSC shall share the use of federal response resource (including but not limited to aircraft, vessels, and booms to contain and remove discharged oil) with the trustees, providing trustee activities do not interfere with response actions. The lead administrative trustee facilitates effective and efficient communication between the FOSC and the other trustees during response operations and is responsible for applying to the FOSC for non-monetary federal response resources on behalf of all trustees. The lead administrative trustee is also responsible for applying to the NPFC for funding for initiation of damage assessment for injuries to natural resources.

2420.1 Federal Trustees

In MOB COTP Zone, the federal trustees include:

- (a) Department of Commerce
- (b) Department of Defense
- (c) Department of Interior

See Section 9200 Personnel and Services Directory for further information

2420.2 State Trustees

State officials designated by the Governor to act as trustee for natural resources within the State's boundaries or for resources belonging to, controlled by, or appertaining to the State of Florida, State of Alabama, and the State of Mississippi.

State trustees shall act on behalf of the public as trustees for natural resources, including their supporting ecosystems, within the boundary of a state or belonging to, managed by, controlled by, or appertaining to such state. The state's lead trustee would designate a representative to serve as contact with the FOSC. This individual should have ready access to appropriate state officials with environmental protection, emergency response, and natural resource responsibilities.

In MOB COTP Zone, the state trustees include:

1.) Florida

- (a) Florida Wildlife Conservation Commission (FWCC)
- (b) Florida Department of Environmental Protection (FDEP)

2.) Alabama

- (a) **Information being updated with more detail by SOSC – 5 Aug 2012**
- (b) Alabama department of Environmental Management

3.) Mississippi

- (a) **Information being updated with more detail by SOSC – 5 Aug 2012**
- (b) Mississippi Department of environmental Quality

Examples of resources under the state trusteeship:

- State forest lands;
- State-owned minerals;
- State parks and monuments;
- State rare, threatened, and endangered species; and
- State wildlife refuges and fish hatcheries

2420.3 Local Trustees

Any lands or areas assigned to local trustees will be coordinated through the State Trustee.

2420.4 Tribal Nations

Tribal nation officials designated by the governing body of any tribe may act as trustee on behalf of the tribe. The Department of the Interior may act as trustee if requested by a tribe.

Examples of resources under the trusteeship:

- Ground and surface water resources on Tribal lands; and
- Any other natural resources found on Tribal land

2421 Identification of Lead Administrative Trustee (LAT)

Lead administrative trustee means a natural resource trustee who is designated on an incident-by-incident basis for the purpose of pre-assessment and damage assessment and chosen by the other trustees whose natural resources are affected by the incident. The lead administrative trustee facilitates effective and efficient communication during response operations between the FOSC and the other natural resource trustees conducting activities associated with damage assessment, and is responsible for applying to the FOSC for access to response operations resources on behalf of all trustees for initiation of a damage assessment.

The trustees shall assure, through the lead administrative trustee, which the FOSC is informed of their activities regarding natural resource damage assessment that may affect response operations in order to assure coordination and minimize any interference with such operations. The trustees shall assure, through the lead administrative trustee that all data from the natural resource damage assessment activities that may support more effective operational decisions are provided in a timely manner to the FOSC.

The Natural Resource Trustee will notify the U.S. Coast Guard of the LAT as soon as possible after an oil spill. As required by E.O. 12777 (October 22, 1991), the Federal Natural Resource Trustee must select a LAT. Depending on the resources at risk and other relative factors, it might be appropriate for the LAT to be a non-federal agency. In such cases, the Federal Natural Resource Trustees would still select a Federal LAT for the purpose of coordination with the representatives of the Oil Spill Liability Trust Fund (OSLTF) to initiate the damage assessment. The non-federal LAT will coordinate all other damage assessment activities.

See also **Fact Sheet Natural Resource Trustees (Federal)**

[http://www.nrt.org/Production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-51FRNT/\\$File/FNRT.pdf?OpenElement](http://www.nrt.org/Production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-51FRNT/$File/FNRT.pdf?OpenElement).

2430 Natural Resource Damage Assessment (NRDA) Representative

The Natural Resource Damage Assessment (NRDA) Representatives are responsible for coordinating NRDA needs and activities of the trustee team. NRDA activities generally do not occur within the structure, processes, and control of the ICS. However, particularly in the early phases of a spill response, many NRDA activities overlap with the environmental assessment performed for the sake of spill response. Therefore, NRDA Representatives should remain coordinated with the spill response organization through the LNO, and they may need to work directly with the UC, Planning Section, Operations Section, and the NOAA SSC to resolve any problems or address areas of overlap. This includes close coordination with the LNO for obtaining timely information on the spill and injuries to natural resources.

While NRDA resource requirements and costs may fall outside the responsibility of the Logistics and Finance/Administrative Sections, coordination is important. The NRDA Representative will coordinate NRDA or injury determination activities.

2430.1 NRDA Funding Through Responsible Party

The Responsible Party (RP) should be the primary funding source for the Natural Resource Damage Assessment (NRDA). The trustees will need early access to representatives of the RP to determine the availability of funding, personnel, and equipment for damage assessment activities. The LAT will first notify the appropriate U.S. Coast Guard representative and request that a meeting be arranged between the Natural Resource Trustees and the RP's representative. Should the U.S. Coast Guard fail to arrange a meeting in a timely fashion, the Natural Resource Trustees will establish contact directly with the RP's representative. When the RP is unknown, contacting the RP is not feasible, or the RP is unwilling or unable to provide funds, the LAT may request funding from the Oil Spill Liability Trust Fund (OSLTF).

2430.2 NRDA funding Through the Oil Spill Liability Trust Fund

(OSLTF)

The Federal LAT must submit a request for initiation of a NRDA to the National Pollution Fund Center (NPFC) to secure a funding obligation following an oil spill. The request must include: the amount requested, the plan for fund use, an estimated

completion date, an agreement for subrogation of all cost recovery actions, an agreement to comply with NPFC documentation requirements, and a certification of lead trustee status. Based on the request for initiation, an Interagency Agreement (IAG) will be executed for each OPA incident, establishing the amount of funds authorized for initiation. The NPFC will assign a document control number to track costs. The Federal LAT is responsible for documenting expenditures and submitting the documentation to the NPFC. In order for the trustee agencies to be funded for their activities all operations must be conducted in compliance with the procedures set forth by the NPFC in Chapter 5, Initiate Requests and NRD Claims, of the NPFC User Reference Guide.

The Federal LAT is expected to manage the funds available for initiation of NRDA. Whenever it appears that actual costs may exceed the amount of the IAG, the LAT should promptly request supplemental funding in the same manner as the original request. Until the IAG is amended to reflect supplemental funding, the LAT must take action to prevent exceeding the obligated amount.

2430.3 Contacts with the Responsible Party (RP)

The RP should be the primary funding source for the Natural Resource Damage Assessment (NRDA). The trustees will need early access to representatives of the RP to determine the availability of funding, personnel, and equipment for damage assessment activities. The LAT will first notify the appropriate U.S. Coast Guard representative and request that a meeting be arranged between the Natural Resource Trustees and the RP's representative. Should the U.S. Coast Guard fail to arrange a meeting in a timely fashion, the Natural Resource Trustees will establish contact directly with the RP's representative. When the RP is unknown, contacting the RP is not feasible, or the RP is unwilling or unable to provide funds, the LAT may request funding from the OSLTF.

2440 Agency Representatives

For incidents involving multiple jurisdictions, an agency or jurisdiction will send a representative to assist with coordination efforts. An Agency Representative is an individual assigned to an incident from an assisting or cooperating agency who has been delegated authority to make decisions on matters affecting that agency's participation at the incident.

Agency Representatives report to the Liaison Officer or to the Incident Commander in the absence of the Liaison Officer.

2450 Stakeholders

A Stakeholder is a group or organization that has a vested interest in a specific area that may be affected by a pollution incident. Many of these groups are government agencies that are responsible for the management and the upkeep of a specific area but are not the designated trustee. See Section 9250 Stakeholders for a listing of stakeholder contact information.

2450.1 Economic

Reserved for Area Committee Development

2450.2 Political

Reserved for Area Committee Development

2450.3 Volunteer Management

After a major pollution incident, especially one that receives extensive press coverage, members of the local communities have demonstrated their concern by arriving at the sites of oil spills and volunteering to participate in efforts to clean up affected areas. The volunteers often arrive in large numbers and are usually untrained in oil spill response and clean up. Utilization of volunteers is subject to the guidance in National Contingency Plan (NCP), 40 CFR 300.185. Generally, volunteers will not be used during federally funded responses without the permission of the OSC. A volunteer's unknown background, a potentially confusing chain of command, and liability issues preclude the use of volunteers in most situations. Should the Unified Command decide to use volunteers obtain Coast Guard or other legal counsel. State and local agencies may utilize volunteers in accordance with their own policies.

In 2011, an MOU was signed between the USCG, EPA and Corporation for National and Community Service (see Section 9510.11). This MOU established the resource support to the FOSC by the Corporation for National and Community Service (CSNS). The CSNS, a wholly-owned US government corporation and federal agency of the US, supports service and volunteering at the national, state, and local levels, overseeing three major initiatives:

AmeriCorps (including state/national, Volunteers in Service to Serve America

(VISTA), and National Civilian Community Corps (NCCC);

Learn to Serve America; and

Senior Corps.

CNCS programs provide vital support, especially human capital, to the national, state and local voluntary organizations and public agencies that lead response, relief and recovery efforts when an incident occurs. In addition, CNCS has specific responsibilities as a support agency within the National Response Framework (NRF). Pursuant to the Stafford Act and other legal authorities, CNCS and its grantees have a record of collaborating with state and local agencies and organizations to support response and recovery efforts.

Non Governmental Organizations (NGO) collaborate with first responders, governments at all levels, and other agencies and organizations providing relief services to sustain life, reduce physical and emotional distress, and promote recovery of disaster victims when assistance is not available from other sources. The American Red Cross is an NGO that provides relief at the local level and also coordinates the Mass Care element of Emergency Support Function #6. The National Voluntary Organizations Active in Disaster (NVOAD) (<http://www.nvoad.org/>) is a consortium of more than 30 recognized national organizations of volunteers' active in disaster relief. Such entities provide significant capabilities to incident management and response efforts at all levels.

Community-Based Organizations (CBO's) receive government funding to provide essential public health services. For example, the wildlife rescue and rehabilitation activities conducted during a pollution emergency are often carried out by local nonprofit organizations and individuals working with natural resource trustee agencies.

A gratuitous service is provided without any expectation of compensation. The distinction between individuals providing volunteer services and those providing gratuitous services is important primarily in determining the type of governmental liability of injury to the individuals and accountability for harms caused by the of voluntary services. First, it bans government officers and employees from accepting voluntary services for the government except for certain emergencies (Unified Command approval). Second, it bans government officers and employees from employing personal services in excess of that authorized by law defined under 31 US Code 1342. The purpose of the statutory prohibition is to avoid situations that might generate future claims for compensation which might be in excess of a Federal agency's funds.

See Section 9240.5 Volunteer Organizations for a listing of volunteer resource information.

2450.31 Volunteer Coordinator and Responsibilities

The Volunteer Coordinator is responsible for managing and overseeing all aspects of volunteer participation, including recruitment, induction and deployment. The Volunteer Coordinator reports to the Liaison Officer.

Responsibilities include:

Coordinate with the Liaison Officer to determine where volunteers are needed
Identify any necessary skills and training needs
Verify minimum skill/training required for volunteer assignment with the Safety Officer and assigned group leaders
Identify, if needed, any necessary stand-by contractors for various training needs (example: HAZWOPER, etc.). Order through Logistics Section.
Coordinate nearby or on-site training as part of the deployment process
Identify and secure other equipment, materials and supplies, as needed
Induct (on-scene) convergent volunteers
Activate other volunteers or organizations on file with SF Area Committee (see Section 9240.7 Volunteer Organizations) as needed
Recruit additional volunteers (by identified skill sets) through media appeals
Assess, train, and assign volunteers. Maintain status with Liaison Officer.
Coordinate with Liaison Officer / Logistics Section for volunteer housing and messing as needed
Assist volunteers with other special needs

2450.32 Response Assistance Assignments

Utilization of volunteers is subject to guidance in National Contingency Plan (NCP), 40 CFR 300.185 which requires identification of functions for volunteer participation during response actions which should generally not involve physical removal or remedial activities. Volunteers will be assigned based on expertise and interest. The following positions and functions may be suitable for volunteer participation:

Check-in / Status Recorder (Resources Unit)
Beach reconnaissance patrols / Notification of injured wildlife (Planning Section)

Demobilization Check-out (Demob Unit Leader)
Community Liaison (Liaison Officer)
Public relations administrative support (Information Officer)
Personnel support functions (Logistics Section)
Facility support functions (ICP, Staging Area, Camps) (Logistics Section)
Wildlife cleaning and rehabilitation (Operations Section)

Others as specific incident characteristics allow

Wildlife cleaning and rehabilitation will be supervised and managed by the Dept of Interior or its delegated representative agency/organization as part of the Operations Section.

Where the Operations Section Chief is directing, using, or controlling volunteers, governmental liability for the health and safety of the volunteers is contingent upon such issues as the level of supervision and control exercised by the FOSC over the activities of the volunteer and the status of the individual. The FOSC may face personal liability to the volunteer where the harm or injury was caused by FOSC actions conducted outside the scope of authority.

2450.33 Volunteer Training

In accordance with the guidelines of the NCP, the FOSC is responsible to provide for the health and safety of all workers. OSHA regulations require specific initial training of workers prior to their engagement in hazardous waste operations or emergency response that could cause exposure to safety and health hazards. The level of training may vary with the worker's job junction and responsibilities. OSHA regulation 29CFR1900.120 dictates the level of HAZWOPER training required for response duties assigned. Volunteers involved in the post-emergency response phases of an oil spill will require hazardous materials awareness training. Volunteers should not be assigned duties in which exposure to gross amounts of oil/hazardous material could be expected. But some support activities may encounter/discover areas of contamination (beach reconnaissance, wildlife rehabilitation, etc.).

Instead, volunteers can fall under a "De Minimis" exception. Under OSHA Directive CPL 2-2.51 and OSHA Standards Interpretation and Compliance Letters (dated 02/13/1992), "a minimum of four hours [training] would be appropriate in most situations." Ensure any training requirements have consensus review by the Safety Officer and Legal Officer.

Persons completing appropriate training are to be given written certification and documented in the response archive file.

2500 RESERVED

2600 RESERVED

3000 OPERATIONS

3000 OPERATIONS SECTION

The Operations Section is responsible for directing the tactical actions to meet incident objectives. See Chapter 7 of the Incident Management Handbook COMDTPUB P3120.17 and Operation Section Chief Job Aid located at (<https://homeport.uscg.mil/ics>) for duties and responsibilities.

In general, the following response priorities will be followed:

- Protect human life and health.
- Minimize ecological impacts.
- Minimize economic and public impacts.

3100 Operations Section Organization

The Ops Section is responsible for all field activities directly applicable to the primary mission. The section also directs the preparation of unit operational plans, requests or releases resources makes expedient changes to the Incident Action Plan as necessary and reports such to the Incident Commander (IC/UC). The Ops Section is comprised of the Recovery and Protection Branch, Emergency Response Branch, Air Operations Branch, and Wildlife Branch, each with subordinate units. The IC/UC will determine the need for a separate Operations Section at an incident or event. Until Operations is established as a separate Section, the IC/UC will have direct control of tactical resources. See Appendices 9100 Required Emergency Notifications and 9200 Personnel and Services Directory for response resources and additional information including Geographic Response Plans and Chemical Countermeasures.

3110 Operations Section Chief

The Operation Section Chief is responsible for the management of all operations directly applicable to the primary mission. The Operations Chief activates, supervises and directs elements in accordance with the IAP and the Site Safety Plan. In addition, the Ops Section Chief directs the preparation of unit operational plans, requests and releases resources makes changes to the IAP as necessary and reports to the Incident Commander. Other Ops Section Chief responsibilities include:

- Implement and manage the Operations Section branches, divisions, and groups needed to proactively accomplish Operations Section actions.

- Assist the Planning Section in defining strategic response goals and tactical operational objectives detailed in the Incident Action Plan.
- Develop detailed mission assignments, sortie schedules, duty lists, and operational assignments to accomplish the strategic response goals and tactical operational objectives.
- Identify additional response resources required or recommend the release of resources to the Unified Command.
- Evaluate and report on response counter measure efficiency.

3120 Operations Section Preliminary Objectives

3120.1 0-4 Hours (Initial Response (Emergency) Phase)

- Confirm the spill and determine if the pollution source can be secured and direct operations to secure.
- Confirm all necessary emergency notifications have been made
- Assess the situation, using ICS 201, including any grounding, firefighting, salvage or additional problems. Determine immediate objectives, priorities, and strategies.
- Request Emergency Medical Services assistance as necessary.
- Coordinate with the Qualified Individual / Responsible Party response team.
- Conduct Hazardous Materials situation assessment including site surveys and air monitoring. Analyze any HAZMAT problems detected.
- Institute Operational Risk Management (ORM) in accordance with Section 9000 of this plan for all personnel involved in the response, including civilian OSRO personnel.
- Deploy field response teams as soon as possible. Activate special teams as necessary.
- Deploy containment boom as close to the source as reasonably possible.
- Estimate current, tide, and weather effects on the situation and product movement.
- Identify high-priority areas for early protection and select appropriate response strategies (see Section 3200 Recovery and Protection Branch of this plan).
- If salvage, lightering, or dewatering operations will be required, provide tasking to those on scene and to support personnel ashore. Provide tasking to divers as necessary.
- Request marine inspector / surveyor for vessel incident.
- Identify potential staging areas ASAP and sites for immediate pre-cleaning and assign personnel.
- Continuously order personnel and equipment required for initial response as the needed. Do not wait to submit an organized or forward-projected estimate for the next operational period. Keep track of all call-ups using ICS 201.
- Direct the delivery and deployment of the first equipment to arrive on-scene.
- Establish well-qualified on-scene supervisors.

- Activate Oil Spill Recovery Vessels and applicable Equipment Specialist for VOSS support as necessary (see Section 9111 Notifications for contact info). (Consider use of USCG WLIC as potential vessel of opportunity)
- Contact USCG/State officials to commence drug and alcohol testing (in conjunction with marine investigators and other investigators).
- Monitor personnel for signs of exhaustion and need for relief/replacement at the 4 hour mark.

3120.2 4-24 Hours (First Operational Period)

- Transition from “emergency phase” driven response posture to a “pre-planned operation” response posture.
- Continue primary containment activities.
- Identify safety hazards that may be present and report observations to the Safety Officer.
- Continue gathering information on the extent of the spill and assist the Planning Section with situation and resource information.
- Arrange for initial over-flight with appropriate observers / Situation Unit Leader. Consider IR camera and video link to help tailor the response effort.
- Determine organization and staffing for the Operations Section.
- Obtain response objectives and priorities from Incident Commander / Unified Command.
- Estimate personnel and equipment required for objectives/priorities; adjust resources
- Consider dispatching liaison assistants to involved Oil Spill Response Organizations (OSROs).
- Commence Incident Planning Process “P” with Planning Section Chief to develop response tactics for the Incident Action Plan.
- Review trajectory models from Environmental Unit/SSC, identify future impacted areas and deploy protective measures (boom, pre-treatment (if approved), etc.).
- Conduct oil recovery operations as able.
- Initiate incident documentation NOW. Identify and document the discharge source, responsible party, and preserve this information for the document unit and finance/administration section.
- Establish a restricted airspace, as needed (see section 3410.3 of this plan).
- Review results of over-flight with Unified Command and determine future air operations needs with the Planning Section Chief.
- Anticipate the need for replacement personnel.

3120.3 24-48 Hours (Second Operational Period)

- Continue to assist Planning Section with information gathering and documentation.
- Continue Incident Planning Process “P” with the Planning Section to maintain the Incident Action Plan per op-period.
- Assist Environmental Unit Leader with data collection and evaluation of options to use alternative countermeasures such as dispersants or in-situ burning.
- Continuously monitor resource allocation to ensure that the most effective use is being made of personnel and equipment.
- Execute the completion and delivery of the following federal and state forms:
 - (1) Notice of Federal Interest;
 - (2) Letter of Designation of Source;
 - (3) Administrative Order (as needed); and
 - (4) Letter of Federal Assumption (as needed).

3130 Scalability of the Operations Section

The Operations Section will naturally evolve based on the needs of the incident. The following Modular Development list illustrates a typical method of expanding the Incident Organization at an oil spill incident. This list is not meant to be restrictive, nor imply that this is the only way to build an ICS organizational structure from an initial response to a multi-branch organization.

Refer to Incident Management Handbook COMDTPUB P3120.17A located at (<https://homeport.uscg.mil/ics>) for incident specific example organizations.

Initial Response Organization - Initial Response resources are managed by the IC who will handle all Command and General Staff responsibilities. A unified command is established.

Reinforced Response Organization - The UC has established a Protection Group and a Recovery Group to manage on-water activities and a shoreline division to manage land-based resources. An SO and IO have been assigned.

Multi-Division/Group Organization - The UC has assigned all Command Staff positions and established a number of Divisions and Groups as well as an OPS and PSC. Some Logistic Units are established.

Multi-Branch Organization -The UC has established all Command and General Staff positions and has established four branches.

3140 Operational Risk Management (ORM)

Human error causes a significant number of mishaps every year that result in the loss of personnel, cutters, boats, aircraft, and equipment. Many times faulty risk decisions place our personnel at greater risk than necessary. After four major marine casualties between 1991 and 1993, including the capsizing and sinking of the F/V SEA KING, the National Transportation Safety Board issued two recommendations documenting the need for Coast Guard risk assessment training.

The application of Operational Risk Management (ORM) is not limited to Coast Guard operations as the Coast Guard usually defines them. All response missions and daily activities require decisions managing risk. In ORM "operational" refers not solely to a rated person or operator, but includes any response personnel who contribute to the overall goal of safe and effective clean up. All organizational levels contribute either directly or indirectly to operational mission success. Therefore, ORM's target audience includes all those involved in operations, maintenance, and support activities.

Traditional risk management practices assert risk is "bad". In reality, that may not be so. Taking calculated risk is essential for an organization to grow and capitalize on its capabilities. ORM's aim is to increase mission success while reducing the risk to personnel, resources, and the environment to a level acceptable for a particular response in a given situation. Responders should identify risk using the same disciplined, organized, logical thought processes that govern all other aspects of response operations. ORM provides the framework to minimize risk, show concern for colleagues, and maximize the unit's mission capabilities, helping to achieve the Unified Command's direction.

Additional benefits include safeguarding our responders' health and welfare and conserving vital resources and support equipment.

3141 Risk Terminology

Responders need to understand terms clearly and communicate risk effectively in order to use the ORM process. Understandably, each facility and activity will differ in how it interprets risk assessment and risk management results due to unique mission differences and its members' varying degrees of knowledge, skill, experience, and maturity. All personnel shall use the common key terms when communicating risk across program and activity lines.

Operational Risk Management (ORM): A continuous, systematic process of identifying and controlling risks in all activities according to a set of pre-conceived parameters by applying appropriate management policies and procedures. This process includes detecting hazards, assessing risks, and implementing and monitoring risk controls to support effective, risk-based decision-making.

Risk: The chance of personal injury or property damage or loss, determined by combining the results of individual evaluations of specific elements that contribute to the majority of risk concerns. Risk generally is a function of severity and probability. The models in this plan, however, single out exposure as a third risk factor.

Severity: An event's potential consequences in terms of degree of damage, injury, or impact on a mission.

Probability: The likelihood an individual event will occur.

Exposure: The amount of time, number of cycles, number of people involved, and/or amount of equipment involved in a given event, expressed in time, proximity, volume, or repetition.

Mishap: An unplanned single or series of events causing death, injury, occupational illness, or damage to or loss of equipment or property.

Hazard: Any real or potential condition that can endanger a mission; cause personal injury, illness, or death; or damage equipment or property.

Risk Assessment: The systematic process of evaluating various risk levels for specific hazards identified with a particular task or operation. Various models are available to complete this step in the ORM process.

Risk Rating Scale: A scale of specific risk degrees, determined during the ORM process's risk assessment step. Various responder communities and activities should use the safety industry's standard terms low, medium, and high when discussing risk across program lines. However, each community will define low, medium, and high risk in terms meaningful to its own personnel.

3142 Operational Risk Management Principles

Accept No Unnecessary Risk: All response operations and daily routines entail risk. Unnecessary risk conveys no commensurate benefit to safety of a mission. The most logical courses of action for accomplishing a response are those meeting all response requirements while exposing personnel and resources to the lowest possible risk. ORM provides tools to determine which risk or what degree of risk is unnecessary.

Accept Necessary Risk When Benefits Outweigh Costs: Compare all identified benefits to all identified costs. The process of weighing risks against opportunities and benefits helps to maximize unit capability. Even high-risk endeavors may be undertaken when decision-makers clearly acknowledge the sum of the benefits exceeds the sum of the costs. Balancing costs and benefits may be a subjective process open to interpretation. Ultimately, the appropriate decision authority may have to determine the balance.

Make Risk Decisions at the Appropriate Level: Depending on the situation, anyone can make a risk decision. However, the appropriate level to make those decisions is that which most effectively allocates the resources to reduce the risk, eliminate the hazard, and implement controls. Supervisors at all levels must ensure subordinates are aware of their own limitations and when subordinates must refer a decision to a higher level.

ORM is Just as Critical in Executing as in Planning: While ORM is critically important in operational planning stages; risk can change dramatically during an actual mission. Therefore, supervisors and senior leadership should remain flexible and integrate ORM in executing tasks as much as in planning for operations.

3143 Quantitative G-A-R Risk Evaluation Process

We can address more general risk concerns, such as those involving planning operations or reassessing risks, as milestones within our plans are met by using the **Green-Amber-Red (GAR)** model. A survey of response personnel identified the following elements as contributing to the majority of risk in their operations:

- (1) Supervision,
- (2) Planning,
- (3) Crew selection,
- (4) Crew fitness,
- (5) Environment, and
- (6) Event or evolution complexity.

The GAR model incorporates these elements, further defined below:

Supervision: Supervisory control should consider how qualified a supervisor is and whether he or she actually is supervising. Even if a person is qualified to perform a task, supervision further minimizes risk. The higher the risk, the more a supervisor should focus on observing and checking. A supervisor actively involved in a task (doing something) can be distracted easily and probably is not an effective safety observer in moderate to high-risk conditions.

Planning: Preparation and planning should consider how much information is available, how clear it is, and how much time is available to plan an evolution or evaluate the situation.

Crew Selection: Crew selection should consider the experience of the persons performing the specific task or evolution. If individuals are replaced during the evolution, assess the new team members' experience.

Crew Fitness: Crew fitness should judge the team members' physical and mental state; generally, a function of how much rest they have had. Quality of rest should consider how a platform rides and its habitability, potential sleep length, and any interruptions. Fatigue normally becomes a factor after 18 hours without rest; however, lack of quality sleep builds a deficit that worsens the effects of fatigue.

Environment: Environment should consider all factors affecting personnel, unit, or resource performance, including time of day, lighting, atmospheric and oceanic conditions, chemical hazards, and proximity to other external and geographic hazards and barriers, among other factors.

Event or Evolution Complexity: Event or evolution complexity considers both the time and resources required to conduct an evolution. Generally, the longer the exposure to a hazard, the greater the risks involved. However, each circumstance is unique. For example, more iterations of an evolution can increase the opportunity for a loss to occur, but on the positive side, may improve the proficiency of the team conducting the evolution, depending on the team's experience, thus possibly decreasing the chance of error. Other factors to consider in this element include how long the environmental conditions will remain stable and the precision and level of coordination needed to conduct the evolution.

Calculating Risk: To compute the total degree of risk for each hazard, assign a risk code of 0 for no risk through 10 for maximum risk to each of the six elements to obtain an estimate of the risk. Add the risk scores to come up with a total risk score for each hazard.

If the total risk value falls in the **(G)reen** zone (1-23), the risk is rated low. A value in the **(A)mber** zone (24-44) indicates moderate risk; consider adopting procedures to minimize it. If the total value falls in the **(R)ed** zone (45-60), implement measures to reduce the risk before starting the event or evolution.

The GAR model is good for a gross assessment of operational risk. If the degree of risk appears unduly high for one or more of the elements above, perform a second assessment using the SPE model for each element of concern, since the SPE model is more specific. As with the SPE model, rank-order all hazards assessed in the GAR model from the highest to the lowest risk to target areas of greatest concern first.

Risk Ratings: The ability to assign numerical values or color codes to risk elements in GAR model is not the most important part of risk assessment. What is critical in this ORM step is team discussion to understand the risks and how the team will manage them. Different Coast Guard operational communities have adopted the GAR model, but may interpret green, amber, and red differently for their own missions and operators. For example, law enforcement personnel may define a "green" risk level a bit higher than personnel involved in recreational boating safety.

Understanding these differences will improve communications among communities. However, a low/medium/high scale is generally understood throughout the Coast Guard and is the safety industry's widely used standard. Therefore, discussions of risk among various Coast Guard activities will use the terms low, medium, and high, but each operational community will define those terms meaningfully for its own operators.

See Section 2230 Operational Risk Management (ORM) for a detailed discussion of the ORM process and GAR model that all supervisors in the Operations Section should be executing for each response activity they perform prior to performing it.

3200 Recovery and Protection

Recovery and Protection Branch

The Recovery and Protection Branch is responsible for overseeing and implementing the protection, containment and clean-up activities established in the IAP.

[Refer to Section 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.](#)

General strategies for response to oil spills are identified in this section.

The following response priorities will follow **PEPE**:

- (1) Protect **P**eople (human life and health);
- (2) Protect **E**nvironment (minimize ecological impacts);
- (3) Protect **P**roperty (minimize public impacts);
- (4) Protect **E**conomy (minimize economic impacts)

Due to the large amount of environmentally sensitive wetlands and the abundance of endangered and threatened fauna and flora that are common to this area, the best strategy for pollution response is prevention. Should a significant spill occur in the area covered by this plan, there will almost certainly be significant environmental damage.

In the event of a spill, the fundamental protection strategy will utilize barrier boom across the mouths of creeks that lead back into marshes areas, tidal flats and mangrove swamps. This strategy, if employed correctly, will protect the maximum of environmentally sensitive areas with a minimum amount of boom.

The probability of success for boom protection strategies is dependent upon wind and current. Currents in excess of 2.5 knots are common inland waters and ICW during tidal changes, and currents in excess of 1 knot are expected in many of the creeks. The speed of response will determine the amount of damage to environmentally sensitive areas. Due to the amount of boom required, it is not feasible to protect the face of the marsh areas during a significant spill. For smaller spills this may be an option. It is hoped that the density of the marsh grasses will limit the distance into which the oil can penetrate.

Numerous environmentally sensitive areas place a high priority on rapid collection of oil. Several collection points have been identified in the Sector Mobile area. The majority of locations are suitable for vacuum truck/skimmer units; this area has many vacuum trucks but few skimmers. Water-based skimmers are also critical to rapid removal of oil in this area but are in extremely short supply.

Environmental Sensitivity indices list 10 types of shorelines. For response purposes, this plan has grouped these 10 types into three categories:

High Sensitivity (Class A) (See Section 3210)

Moderate Sensitivity (Class B) (See Section 3213)

Low Sensitivity (Class C) (See Section 3216)

Note: Parks, refuges and reserves for natural resource conservation and management have not been included. This is because the habitat types designated in the following sections above provide more effective and detailed delineation.

Shoreline cleanup will be conducted in accordance with shoreline sensitivity classification as outlined in the following sections.

3201 NOAA Shoreline Countermeasures Manual

The following strategies and matrices in this section are drawn from the NOAA Shoreline Countermeasures Manual for Tropical Coastal Environments:

(http://response.restoration.noaa.gov/sites/default/files/shoreline_countermeasures_tropical.pdf).

The Environmental Sensitivity indexes in that manual list 10 types of shorelines and utilizes a Shoreline Countermeasure Matrix to indicate RECOMMENDED, CONDITIONAL and NOT RECOMMENDED shoreline countermeasures for oil spill response to different types of oil. The Matrix contains countermeasures for the following types of oils:

- Very Light Oils (Jet fuels, Gasoline)
- Light Oils (Diesel, No. 2 Fuel Oils, Light Crudes)
- Medium Oils (Most Crude Oils)
- Heavy Oils (Heavy Crude Oils, No. 6 fuel, Bunker C)

The countermeasures listed are not necessarily the best under all circumstances and any listed technique may need to be used in conjunction with other techniques, including ones not listed on the matrix. The FOSC has the responsibility for and authority to determine what countermeasures are appropriate for the various situations encountered. The Shoreline Countermeasure Matrices provided on the next four pages.

3201.1 Shoreline Countermeasures Matrix (Very Light Oils)

Very Light Oils (Jet Fuels, Gasoline)

- Highly volatile (should all evaporate within 1 - 2 days)
- High concentrations of toxic (soluble) compounds
- Result: Localized, severe impacts to water column and intertidal resources

- Duration of impacts is a function of the resource recovery rate
- No dispersion necessary

SHORELINE TYPE CODES													
1 – Exposed rocky shores and vertical, hard man-made structures (e.g., seawalls)							6A – Gravel beaches						
2 – Exposed wave-cut rock platforms and reef flats							6B – Exposed riprap						
3 – Fine-grained sand beaches							7 – Exposed tidal flats						
4 – Medium- to coarse-grained sand beaches							8 – Sheltered rocky shores and coastal structures						
5A – Mixed sand and gravel beaches							9 – Sheltered tidal flats						
5B – Artificial fill having a range of grain size & materials							10 – Mangroves						
COUNTERMEASURE	SHORELINE TYPES												
	1	2	3	4	5A	5B	6A	6B	7	8	9	10	
1) No Action	R	R	R	R	R	R	R	R	R	R	R	R	R
2) Manual Removal													
3) Passive Collection (Sorbents)	R	R	R	R	R	R	R	R	R	R	R	R	R
4) Debris Removal	R	R	R	R	R	R	R	C	R				C
5) Trenching													
6) Sediment Removal													
7) Ambient Water Flooding (Deluge)									R	R			C/R
8) Ambient Water Washing													C/R
a) Low Pressure (<50 psi)													C/R
b) High Pressure (<100 psi)													
9) Warm Water Washing/Mod-High Pressure													
10) Hot Water/High Pressure Washing													
11) Slurry Sand Blasting													
12) Vacuum													
13) Sediment Reworking													
14) Excavation, Cleansing, and Replacement													
15) Cutting Vegetation													
16) Chemical Treatment *													
a) Oil Stabilization with Elastomizers													
b) Protection of Beaches													
c) Cleaning of Beaches													
17) <i>In situ</i> Burning of Shorelines *													
18) Nutrient Enhancement *													
19) Microbial Addition *													

* - Requires RRT approval R – Recommended – may be preferred alternative C- Conditional
 NR – Not Recommended

This countermeasure advisability matrix is only a general guide for removal of oil from shoreline substrates. It must be used in conjunction with the entire

Shoreline Countermeasure Manual plus field observations and scientific advice. The countermeasures listed are not necessarily the best under all

circumstances, and any listed technique may need to be used in conjunction with other techniques (including ones not listed herein). The Federal On-Scene Coordinator (FOSC) or state OSC operating with the FOSC's authorization has the responsibility for and authority to determine which countermeasure(s)

are appropriate for the various situations encountered. Selection of countermeasures is based on the degree of oil contamination, the shoreline type, and the presence of sensitive resources. Extremely sensitive areas are limited to manual cleanup countermeasures.

3201.2 Shoreline Countermeasures Matrix (Light Oils)

Light Oils (Diesel, No. 2 Fuel Oils, Light Crudes)

- Moderately volatile; will leave residue (up to 1/3 of spilled amount)
- Moderate concentrations of toxic (soluble) compounds

- Will “oil” intertidal resources with long-term contamination potential
- Has potential for subtidal impacts (dissolution, mixing, sorption onto suspended sediments)
- No dispersion necessary
- Cleanup can be very effective

SHORELINE TYPE CODES												
1 – Exposed rocky shores and vertical, hard man-made structures (e.g., seawalls)							6A – Gravel beaches					
2 – Exposed wave-cut rock platforms and reef flats							6B – Exposed riprap					
3 – Fine-grained sand beaches							7 – Exposed tidal flats					
4 – Medium- to coarse-grained sand beaches							8 – Sheltered rocky shores and coastal structures					
5A – Mixed sand and gravel beaches							9 – Sheltered tidal flats					
5B – Artificial fill having a range of grain size & materials							10 – Mangroves					
COUNTERMEASURE	SHORELINE TYPES											
	1	2	3	4	5A	5B	6A	6B	7	8	9	10
1) No Action	C	R	C	C	C	C	C	C	R	R	R	R
2) Manual Removal	C		R	R	C	C	C					C
3) Passive Collection (Sorbents)	R	R	R	R	R	R	R	R	R	R	R	R
4) Debris Removal	R	R	R	R	R	R	R	C	R			R
5) Trenching			C	C	C	C	C					
6) Sediment Removal			C	C		R						
7) Ambient Water Flooding (Deluge)	R	R		C	R	R	C	C	R	C		C
8) Ambient Water Washing	R	C		C	R	R	C	C				C/R
a) Low Pressure (<50 psi)	R	C		C	R	R	C	C				C/R
b) High Pressure (<100 psi)	R	C			C	C	C	C				
9) Warm Water Washing/Mod-High Pressure	R	C			C	C	C	C				
10) Hot Water/High Pressure Washing	C				C	C	C	C				
11) Slurry Sand Blasting												
12) Vacuum			C									C
13) Sediment Reworking			C	C	C	R	C					
14) Excavation, Cleansing, and Replacement			C	R	C	R	C	C				
15) Cutting Vegetation												
16) Chemical Treatment *								C				C
a) Oil Stabilization with Elastomers												C
b) Protection of Beaches								C				C
c) Cleaning of Beaches	C	C			C	C	C	C				C
17) <i>In situ</i> Burning of Shorelines *												
18) Nutrient Enhancement *					C	C	C					C
19) Microbial Addition *					C	C	C					C

3210 Protection* - Requires RRT approval R – Recommended – may be preferred alternative C-Conditional

NR – Not Recommended

This countermeasure advisability matrix is only a general guide for removal of oil from shoreline substrates. It must be used in conjunction with the entire Shoreline Countermeasure Manual plus field observations and scientific advice. The countermeasures listed are not necessarily the best under all circumstances, and any listed technique may need to be used in conjunction with other techniques (including ones not listed herein). The Federal On-Scene Coordinator (FOSC) or state OSC operating with the FOSC’s authorization has the responsibility for and authority to determine which countermeasure(s) are appropriate for the various situations encountered. Selection of countermeasures is based on the degree of oil contamination, the shoreline type, and the

3201.3 Shoreline Countermeasures Matrix (Medium Oils)

Medium Oils (Most Crude Oils)

- About 1/3 will evaporate within 24 hours
- Maximum water-soluble fraction is 10-100 ppm
- Oil contamination of intertidal areas can be sever/long term
- Impact to waterfowl and fur-bearing mammals can be severe
- Chemical dispersion is an option within 1 – 2 days
- Cleanup most effective if conducted quickly

SHORELINE TYPE CODES												
1 – Exposed rocky shores and vertical, hard man-made structures (e.g., seawalls)						6A – Gravel beaches						
2 – Exposed wave-cut rock platforms and reef flats						6B – Exposed riprap						
3 – Fine-grained sand beaches						7- Exposed tidal flats						
4 – Medium- to coarse-grained sand beaches						8 – Sheltered rocky shores and coastal structures						
5A – Mixed sand and gravel beaches						9 – Sheltered tidal flats						
5B – Artificial fill having a range of grain size & materials						10 - Mangroves						
COUNTERMEASURE	SHORELINE TYPES											
	1	2	3	4	5A	5B	6A	6B	7	8	9	10
1) No Action	C	R	C	C	C	C	C	C	R	R	R	C
2) Manual Removal	C	R	R	R	C	C	C	C	R			C
3) Passive Collection (Sorbents)	R	R	R	R	R	R	R	R	R	R	R	R
4) Debris Removal	R	R	R	R	R	R	R	R	R			R
5) Trenching			C	C	C	C	C					
6) Sediment Removal			C	C		R						
7) Ambient Water Flooding (Deluge)	R	R		C	R	R	C	R	R	R	C	C
8) Ambient Water Washing	R	C		C	R	R	C	R	C	C		C/R
a) Low Pressure (<50 psi)	R	C		C	R	R	C	R	C	C		C/R
b) High Pressure (<100 psi)	R	C		C	C	C	C	R	C	C		
9) Warm Water Washing/Mod-High Pressure	R	C			C	C	C	R	C	C		
10) Hot Water/High Pressure Washing	C				C	C	C	R	C	C		
11) Slurry Sand Blasting												
12) Vacuum			C									C
13) Sediment Reworking			C	C	C	R	C					
14) Excavation, Cleansing, and Replacement			C	R	C	R	C	C				
15) Cutting Vegetation												
16) Chemical Treatment *							C					C
a) Oil Stabilization with Elastomizers												C
b) Protection of Beaches										C	C	C
c) Cleaning of Beaches	C	C			C	C	C	C/R	C	C		C
17) <i>In situ</i> Burning of Shorelines *												
18) Nutrient Enhancement *					C	C	C		C	C		C
19) Microbial Addition *					C	C	C		C	C		C

* - Requires RRT approval R – Recommended – may be preferred alternative C- Conditional

NR – Not Recommended

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Coordinator (FOSC) or state OSC operating with the FOSC's authorization has the responsibility for and authority to determine which countermeasure(s) are appropriate for the various situations encountered. Selection of countermeasures is based on the degree of oil contamination, the shoreline type, and the presence of sensitive resources. Extremely sensitive areas are limited to manual cleanup countermeasures.

3201.4 Shoreline Countermeasures Matrix (Heavy Oils)

Heavy Oils (Heavy Crude Oils, No. 6 Fuel Oil, Bunker C)

- Heavy oils with little or no evaporation or dissolution
- Water-soluble fraction likely to be < 10 ppm
- Heavy contamination of intertidal areas likely
- Severe impacts to waterfowl and fur-bearing mammals (coating & ingestion)
- Long-term contamination of sediments possible & weathers very slowly

SHORELINE TYPE CODES												
1 – Exposed rocky shores and vertical, hard man-made structures (e.g., seawalls)							6A – Gravel beaches					
2 – Exposed wave-cut rock platforms and reef flats							6B – Exposed riprap					
3 – Fine-grained sand beaches							7- Exposed tidal flats					
4 – Medium- to coarse-grained sand beaches							8 – Sheltered rocky shores and coastal structures					
5A – Mixed sand and gravel beaches							9 – Sheltered tidal flats					
5B – Artificial fill having a range of grain size & materials							10 - Mangroves					
COUNTERMEASURE	SHORELINE TYPES											
	1	2	3	4	5A	5B	6A	6B	7	8	9	10
1) No Action	C	R	C	C	C	C	C	C	R	R	R	C
2) Manual Removal	C	R	R	R	C	C	C	R				C
3) Passive Collection (Sorbents)	R	R	R	R	R	R	R	R	R	R	R	R
4) Debris Removal	R	R	R	R	R	R	R	R				R
5) Trenching			C	C	C	C	C	C				
6) Sediment Removal			C	C		R						
7) Ambient Water Flooding (Deluge)	R	R		C	R	R	C	R	R	R		C
8) Ambient Water Washing	R	C		C	R	R	C	R	C	C		C
a) Low Pressure (<50 psi)	R	C		C	R	R	C	R	C	C		
b) High Pressure (<100 psi)	R	C			C	C	C	R	C	C		
9) Warm Water Washing/Mod-High Pressure	R	C			C	C	C	R	C	C		
10) Hot Water/High Pressure Washing	C				C	C	C	R	C	C		
11) Slurry Sand Blasting												
12) Vacuum			C									C
13) Sediment Reworking			C	C	C	R	C					
14) Excavation, Cleansing, and Replacement			C	R	C	R	C	C				
15) Cutting Vegetation												
16) Chemical Treatment *								C				C
a) Oil Stabilization with Elastomers												C
b) Protection of Beaches									C	C		C
c) Cleaning of Beaches					C	C	C	C	C	C		C
17) <i>In situ</i> Burning of Shorelines *	C	C										
18) Nutrient Enhancement *					C	C	C		C	C		C
19) Microbial Addition *					C	C	C		C	C		C

* - Requires RRT approval R – Recommended – may be preferred alternative C- Conditional
NR – Not Recommended

This countermeasure advisability matrix is only a general guide for removal of oil from shoreline substrates. It must be used in conjunction with the entire Shoreline Countermeasure Manual plus field observations and scientific advice. The countermeasures listed are not necessarily the best under all circumstances, and any listed technique may need to be used in conjunction with other techniques (including ones not listed herein). The Federal On-Scene Coordinator (FOSC) or state OSC operating with the FOSC's authorization has the responsibility for and authority to determine which countermeasure(s) are appropriate for the various situations encountered. Selection of countermeasures is based on the degree of oil contamination, the shoreline type, and the presence of sensitive resources. Extremely sensitive areas are limited to manual cleanup countermeasures.

3205 Containment and Protection Options

Refer to basic booming strategies for information concerning specific locations for containment and protection:

- Diversion Booming
- Containment Booming
- Exclusion Booming
- Cascading Booming
- Chevron Booming

3210 Class A Ecosystem / Shoreline Types – High Priority

This section outlines critical operations information about Class A Ecosystem / Shoreline Types

Class A Ecosystem / Shorelines include:

- Rare species and their critical habitats (some seasonal)
- Breeding, nesting, spawning areas (some seasonal)
- Coral Reefs, shallow (<3 meters deep)
- Salt Marsh and Mangrove Swamp
- Freshwater Marshes and Swamps
- Inlets, tidal creeks, passes which would convey oil to high priority habitats/areas
- Vegetated River Banks
- Sea grass beds, shallow (<1 meter deep)
- Shellfish Harvesting Areas
- Hard "live" bottom, shallow (<1 meter deep)
- Human health and safety
- Public utilities water intakes
- Archeological sites

3210.1 Coral Reefs

Coral reefs are among the world's most complex and biologically diverse marine ecosystems and are increasingly threatened by pollution and other human generated activities. Comprising over 6,000 known species, corals (anthozoans) include sea fans, sea pansies and anemones. Most corals contain a symbiotic algae called zooxanthellae, within their gastrodermal cells. The coral provides the algae with a protected environment and the compounds necessary for photosynthesis. These include carbon dioxide, produced by coral respiration, and inorganic nutrients such as nitrates, and phosphates, which are metabolic waste products of the coral. In return, the algae produce oxygen and help the coral to remove wastes. Most importantly, they supply the coral with organic products of photosynthesis. These compounds, including glucose, glycerol, and amino acids, are utilized by the coral as building blocks in the manufacture of proteins, fats, and carbohydrates, as well as the synthesis of calcium carbonate (CaCO_3). The mutual exchange of algal photosynthates and cnidarian metabolites is the key to the prodigious biological productivity and limestone-secreting capacity of reef building corals. Finally, coral reefs are directly impacted by marine-based pollution. Leaking fuels, anti-fouling paints and coatings, and other chemicals can leach into the water, adversely affecting corals and other species.

Petroleum spills also are a concern. Due to few large scale spills and lack of detailed studies into the subject, little information is known about the direct affect on corals. Due to the fragile nature of this ecosystem, this habitat type was given a class A priority.

In 2000, Congress enacted the Coral Reef Conservation Act (CRCA) for the protection and management of coral reefs which included appropriations and authorities to NOAA and establishment of the US Coral Reef Task Force. Any suspected or potential damage to corals require immediate notification to NOAA for impact assessment and consultation.

Predicted Oil Impacts:

- Most quantities of oil, typical cargoes to Sector Mobile AOR, should remain near the surface of the water with little or no immediate danger to deeper water colonies. Depth of water is a critical component to exposure.
- Corals that are spawning at the time of an oil spill however, can be damaged because the eggs and sperm, which are released into the water at very precise times, remain at shallow water depths for various times before they settle. Thus, in addition to compromising water quality, oil pollution can disrupt the long-term viability and reproductive success of corals, rendering them more vulnerable to other types of

disturbances. Timing of a spill is also a critical component to exposure.

- Excessive silting in shallower water may occur due to heavy response boat traffic causing potential suffocation of polyps.
- Excessive damage can occur from multiple booming anchors in vicinity of coral colonies.

Recommendations during spill response:

- While coating of oil upon any part of a coral will kill the affected area, physical cleaning will induce additional damage due to the fragile nature of the species and therefore is not advised.
- Protective and diversion booming may be the best option to prevent potential oiling.
- Consult with NOAA SSC and/or Environmental Unit for incident specific strategies and tactics.

3210.2 Vegetated River Banks

Vegetated riverbanks occur as grassy herbaceous vegetation or trees that grow along the riverbanks to the water's edge. They may occur in fresh or brackish water systems, and may be subject to flooding, depending on the slope of the bank. A variety of plant species may be found along the riverbanks dependant on a number of factors such as the salinity of the river, steepness of the bank, degree of flooding, and exposure to current. Many of the locations contain archaeological sites. Due to the large numbers and diversity of native plant and animal species, the possibility of archaeological sites, the difficulty of cleaning these areas, and the possibility of freshwater contamination, this habitat type was given a class A priority.

Predicted Oil Impacts:

- Small quantities of oil will cover outer edges of the area, however large quantities of oil may penetrate the sediment and coat the vegetation.
- Biological impacts may be great if oiling is heavy. Freshwater could be affected.
- The area / extent of surface oiling will also be affected by boat wakes and tides.
- Oil may persist for several months or years if not cleaned.

Recommendations for Cleaning:

- An archaeologist should be consulted prior to any cleaning for determination of archaeological significance.
- High-energy areas may be cleaned naturally, particularly if oiling is light.
- Low pressure spraying may be effective.

3210.3 Salt Marsh and Mangrove Swamp

These highly productive marshes typically occur near inlets and along the rivers behind barrier islands. The predominant plants are cord grass, turtle grass, and rushes. Numerous species of wading birds, waterfowl, fishes, and invertebrates inhabit the marshes. Shellfish harvesting areas are often located within salt marshes. Salt marshes provide protection for many commercially important juvenile fish. Alligators and Atlantic salt marsh snakes inhabit these marshes.

These estuarine systems are characterized by mangroves and extensive sea grass beds, in addition to cord grass and rushes. These marshes support the greatest number of nesting birds on the coast including wading birds, shorebirds, hawks, eagles, and songbirds.

Predicted Oil Impacts:

- Vegetation would become coated by oil, heavy oil may cause smothering;
- Persistence may be long term because of difficulty in cleaning;
- Water-soluble toxic fractions of oil may penetrate sediments;
- High degree of biologic stress to mangroves, contamination of food chain.

Recommendations for Cleaning:

- Generally cleaning is not recommended, and may cause additional physical damage to the marsh. Consult with Environmental Unit regarding high volume flushing.

3210.4 Sea Grass Beds

Sea grasses are highly productive, and are a major basis for inshore food chains. Their physical structure provides living space and protection from predation for a variety of organisms. Sea grass beds are essential nursery and feeding grounds for many marine organisms, especially commercial and recreationally important species and endangered manatee and sea turtles. Sea grasses stabilize sediments and play a key role in nutrient cycling.

Predicted Oil Impacts:

- Oiling of sea grass blades would result in blade defoliation as well as loss of sea grass and algal production, habitat and food for marine organisms. Recovery could take 6 to 12 months. The greatest impact to grasses would occur during low tide.
- Heavy or weathered oil could sink and smother grass beds.
- Oil has toxic effects (lethal and sublethal) on invertebrates and fishes inhabiting grass beds. Juvenile forms are most vulnerable. The greatest toxic effects occur in shallow (<1 m) grass beds.
- Oiling of sediments impact sea grass rhizomes and roots (below ground plant tissues) and infauna. This is likely to occur if oil sinks. Potential effects: below ground sea grass mortality; infauna mortality; productivity loss; sediment

destabilization; and habitat destruction. Effects are greatest in shallow grass beds. Recovery time is at least 1 to 2 years, likely more.

Recommended Response Activities:

- Prevent oil from entering grass beds.
- Care should be taken to not scar grass beds with boat propellers involved in response activities.
- Extreme care should be taken to not disturb sediments during cleanup activities; this could result in the complete loss of grass bed.
- Clean up efforts onshore (e. g., water washing/flushing) should not result in deposition of oiled sediments into grass beds.
- Before and during cleaning, responders must evaluate if cleaning activities will be more detrimental to the bed than actual oiling.
- Oiled Intertidal or Exposed Grass Beds: Do not clean oiled grass blades; blades will slough off naturally. If oil is on sediment surface, remove by vacuum or hand. Minimize disturbance and removal of sediment and below ground sea grass.
- Sunken Oil in Submerged Grass Beds: Remove from grass bed annually or by vacuum. Minimize disturbance and removal of sediment and below ground sea grass.
- Consult with Environmental Unit regarding incidental removal of above ground grass (blades, shoots) during cleanup; these normally slough off naturally.

3210.5 Freshwater Marshes and Swamps

Freshwater marshes occur in the floodplains of the major rivers in Sector Mobile's AOR and associated tributaries. Marshes are characterized by emergent herbaceous plants, fluctuating water levels, and recurring fires. Typical plant species include pickerelweed, maidencane, saw grass, cord grass and rushes. Marshes are also important breeding grounds for all classes of vertebrates, particularly reptiles and amphibians dependent on the wetland resources. Freshwater marshes perform other functions such as flood control, freshwater storage areas, fisheries production, and recreation.

Freshwater Swamps are distinguished from marshes by the abundance of trees, and are wooded wetlands. Cypress trees are the dominant wetland tree in the zone, however other water tolerant species include pond pine, cabbage pond, black gum, willow, and laurel oak. River swamps are thought to be the most biologically diverse type of swamp, providing food, cover, and nesting areas for a number of animals. Benthic invertebrates such as crayfish, clams, snails, and insect larvae inhabit swamps, as do numerous fish, some rare and endangered. A variety of birds and mammals utilize swamps at least some part of the year, notably river otters that feed on crayfish, black bear, Florida panthers,

and mink, all considered to be rare, threatened, or endangered, and swallow tail kites and Mississippi kites.

Predicted Oil Impacts:

- Oil would be persistent because of the low flushing of freshwater marshes and swamps.
- Oil may cling to the vegetation further reducing natural cleaning; high mortality for resident animals.
- Vegetation may be seasonally sensitive with dormant vegetation being less sensitive than blooming and seeding plants. Freshwater supplies may be contaminated by small amounts of oil.

Recommendations for Cleaning:

- Consider burning in freshwater marsh; it is a fire-adapted community.
- Manual cleaning from boat.
- Avoid any activity that mixes oil into sediment.
- Natural recovery recommended for light oiling.

3210.6 Shellfish Harvesting Areas

In addition to the economic value of lobsters, shrimp and other shellfish, mollusks provide habitat and food for a variety of other estuarine organisms. Oysters spawn from late spring to early fall in estuarine areas. The larvae of oysters require a solid substrate, and generally utilize existing colonies for attachment. Oysters are filter feeders and rely on algae and suspended and dissolved organic matter for sustenance.

Predicted Oil Impacts:

- Most oyster reefs are inter-tidal and would be coated with oil during ebb tides.
- Oysters are in danger of smothering from silting of sediments suspended in the water column.
- Large economic losses predicted if oiling occurs in shellfish harvesting areas.

Recommendations for Cleaning:

- Do not use clean-up methods that stir up bottom sediments or mechanically damage oyster reefs.
- Consult with Environmental Unit regarding natural cleaning, low/medium volume flushing or low pressure cold wash.

3213 Class B Shoreline Types – Moderate Priority

This section outlines critical operations information for Class B Shoreline Types.

Class B Shorelines include:

- Coral Reefs, deeper (>3 meters deep)
- Sea grass, deeper (>1 meter deep)
- Hard "live" bottom, deeper (>1 meter deep)
- Rocky shores
- Fine Sand Beaches
- Coarse/Mixed Sand Beaches, Gravel Beaches, Spoil Sites, Rip Rap, and Fill Sites
- Tidal flats (sand/mud; no vegetation)
- All other natural shores (including sand beaches) within conservation areas

3213.1 Fine Sand Beaches

This shoreline type is very common on the barrier islands. Beaches may be backed by dunes in rural areas or seawalls in the more urban areas. Beaches are typically hard packed and exposed to varying degrees of wave and current energy, depending on their location (inland or coastal). Oil penetration into the sediments would be shallow. Properties of fine sand beaches render them among the easiest of all shoreline types to clean. Often, they are fronted by tidal flats, particularly along sheltered areas. They may also be important recreational and/or economic resources. Biological diversity and density may be low, however seasonal use by seabirds and marine turtles may be high.

Predicted Oil Impacts:

- Oily bands along upper intertidal zones varying in intensity with amount of product accumulated.
- Shallow penetration of oil into sediment.
- Danger of oiling seabirds or other organisms in the intertidal zone.

Recommendations for Cleaning:

- Care should be taken to prevent mechanical mixing of oil deeper into sediments
- Minimize amount of sand removed from beach
- Caution should be exercised in dune areas, particularly where concentrations of the endangered beach mouse exist.

3213.2 Coarse/Mixed Sand Beaches, Spoil Sites, Rip Rap, and Fill Sites

These shoreline types are plentiful along the coast as well as inland along riverbanks. Biological diversity and/or density may range from low along the coarse sand beaches to high among gravel beaches and rip rap. These shoreline types were classified as Class B sensitivity in spite of the fact that they are generally cleanable, because of the species

richness of gravel beaches and rip rap, and because of the threatened and endangered species which utilize sand beaches and fill and spoil sites.

Predicted Oil Impacts:

- Oil may penetrate deeply into sediments on coarse sand beach, with toxic effects primarily on epifaunal amphipods.
- Little penetration of oil into fill.
- Oil will penetrate between boulders of rip rap, causing lethal effects on resident flora and fauna.
- Toxic effects on invertebrates in any of these shoreline types will have detrimental effects on grazing shorebirds.

Recommendations for Cleaning:

- On coarse or mixed grain beaches, minimize sand removal. Manual cleanup is most effective.
- Avoid excessive removal of sediment from fill, use manual cleanup or low pressure spray.
- Remove oiled debris from rip rap, consider spraying, and/or replacement of heavily oiled rip rap to prevent chronic leaching.

3213.3 Tidal Flats

Exposed tidal flats are primarily composed of sand and mud in shallow areas where currents and waves are sufficient to mobilize sand. The sediments are water-saturated and only the higher elevations dry during low tide. Large numbers of polychaetes, copepods, amphipods, fiddler crabs, and snails render tidal flats exceptional foraging grounds for birds. Vegetation may be present at the higher elevations.

Sheltered tidal flats are generally located along lagoon beaches, waterward of salt marshes, and other calm water locations. Sediments are extremely soft, consisting primarily of silt and clay. Although rooted vegetation is sparse, microscopic algae form the basis of the food chain. A multitude of birds are attracted to these tidal flats to feed on mollusk, crab, shrimp, flounder, mullet, and a variety of infaunal invertebrates. Many of the birds forage on sheltered tidal flats from extensive nesting colonies in nearby upland areas.

Predicted Oil Impacts:

- Oil would not be expected to penetrate water saturated sediments, but may coat the surface layer on an ebb tide.
- Biological damage may be severe with significant impact from smothering.
- Persistence may be long term in sheltered flats.

Recommendations for Cleaning:

- Deployment of sorbents from shallow-draft boats.
- Careful removal of oiled wrack.
- Mechanical damage from walking on flats can be severe.

3216 Class C Shoreline Types – Low Priority

This section outlines critical operations information about Class C Shoreline Types.

Class C Shorelines include:

- Seawalls Industrial facilities and Piers
- Rocky Platforms
- Man-made canal systems (w/o riprap shoreline)
- Sand beaches (not included in above habitats)
- Storm water drains
- Developed and agricultural lands

3216.1 Sea Walls and Piers

These shoreline types are common in urban areas for protection of residential and industrial properties. They are typically constructed of concrete, stone, wood, or metal and are often inhabited by barnacles, shellfish, and algae. These shoreline types were given a low priority ranking because of their ease in cleaning, short time period for recruitment and re-establishment of biota.

Predicted Oil Impacts:

- Oil may percolate between joints of wooden or stone structures.
- Some biota would be damaged; other species would exhibit greater tolerance.
- Persistence of oil would be dependent upon exposure to high-energy waves and currents.

Recommendations for Cleaning:

- High-pressure washing to prevent chronic leaching.

3216.2 Rocky Platforms

This shoreline type is rare in the Sector Mobile area and is typically associated with other shoreline types. In general, rocky areas can be found on shorelines facing the open ocean where they are exposed to high-energy waves and currents. This shoreline type was classified as low sensitivity because of this high-energy exposure as well as ease in cleaning. The biotic assemblage of this shoreline type consists primarily of infaunal polychaetes and amphipods, which display low sensitivity to oiling.

Predicted Oil Impacts:

- Oiled wrack and/or heavy oils may accumulate in depressions along rocks, slowing natural cleaning.
- Amphipods and isopods are relatively tolerant of toxic effects of oil, however, thermal absorbance capacity or rock surface may be increased.

Recommendations for Cleaning:

- Removal of oiled wrack.
- High-pressure spray may be effective where plants and animals are not attached.
- Natural cleaning in high-energy areas.

3217 Hazardous Materials Release Classification

The classification of hazardous substance releases under 40 CFR 300.6 is as follows:

Minor: Any release that causes minimal threat to public health or welfare and/or the environment.

Medium: All releases other than a minor or major release.

Major: Any release that causes a substantial threat to public health or welfare, a substantial threat to the environment and/or significant public concern.

3220 Protection Group

The Protection Group is responsible for the deployment of containment, diversion and absorbing boom in designated locations including fire boom.

Responsibilities include:

- Deploy and maintain booms, dikes, or other protection devices as directed to accomplish protection, diversion, or containment strategies, and modify planned strategies as required by actual field conditions.
- Provide estimates of protection completion times.
- Report on the effectiveness of booming to the Operations Section Chief.
- Maintain booms and mooring systems and ensure that product which has been

- contained, diverted, or captured is recovered.
- Identify protection resource and logistics needs, including boom types, lengths, mooring systems, and vessel support requirements.
 - Propose alternative protection strategies based on field results and environmental conditions.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3220.1 Containment and Protection Options

A number of advanced response mechanisms are available for controlling oil spills and minimizing their impacts on human health and the environment. The key to effectively combating spills is careful selection and proper use of the equipment and materials best suited to the type of oil and the conditions at the spill site. Most spill response equipment and materials are greatly affected by such factors as conditions at sea, water currents, and wind.

The three principles of mechanical protection are containment, deflection, and exclusion. Containment consists of deploying a boom or other barrier to hold the oil in place, with oil recovery the main objective. Deflection consists of diverting moving oil either away from a sensitive area without any attempt to recover the oil at that site, or toward a containment site where recovery of the oil is more feasible. Exclusion consists of placing either temporary or permanent barriers to prevent oil from reaching an area; usually there is no attempt to recover the oil.

Mechanical containment or recovery

Is the primary line of defense against oil spills in the United States. Containment and recovery equipment includes a variety of Booms, (Oil Program, US EPA), barriers, and Skimmers, (Oil Program, US EPA), as well as natural and synthetic Sorbents, (Oil Program, US EPA). Mechanical containment is used to capture and store the spilled oil until it can be disposed of properly.

Booms

Booms are essentially devices placed on the water surface to form a floating barrier to oil slicks. All booms are manufactured using five elements: flotation, skirt, ballast, longitudinal strength member, and connector/anchoring points

Containment booms are used to control the spread of oil to reduce the possibility of polluting shorelines and other resources, as well as to concentrate oil in thicker surface layers, making recovery easier. In addition, booms may be used to divert and channel oil slicks along desired paths, making them easier to remove from the surface of the water. Although there is a great deal of variation in the design and construction of booms, all generally share the following four basic elements:

- An above-water "freeboard" to contain the oil and to help prevent waves from splashing oil over the top of the boom
- A flotation device
- A below-water "skirt" to contain the oil and help reduce the amount of oil lost under the boom
- A "longitudinal support," usually a chain or cable running along the bottom of the skirt, that strengthens the boom against wind and wave action; the support may also serve as a weight or ballast to add stability and help keep the boom upright

Booms can be divided into several basic types:

Fence booms have a high freeboard and a flat flotation device, making them least effective in rough water, where wave and wind action can cause the boom to twist.

Round or curtain booms have a more circular flotation device and a continuous skirt. They perform well in rough water, but are more difficult to clean and store than fence booms.

Non-rigid or inflatable booms come in many shapes. They are easy to clean and store, and they perform well in rough seas. However, they tend to be expensive, more complicated to use, and puncture and deflate easily.

Fire Resistant Boom is a specialized type of boom used in-situ burning of oil at sea. Several factors are involved with the employment/use of this boom such as approval for in-situ burning, age of collected oil, thickness of oil during burning, and specialized safety precautions.

All boom types are greatly affected by the conditions on the water; the higher the waves swell, the less effective booms become. While most booms perform well in gentle seas with smooth, long waves, rough and choppy water is likely to contribute to boom failure.

Generally, booms will not operate properly when waves are higher than one meter or currents are moving faster than one knot per hour.

Teardrop or Donut

Often used in areas with very strong currents and deep water, which make holding the oil in place nearly impossible.

- Thick slicks are collected and enclosed in boom, which drifts with the currents.
- Skimmers go to the contained oil to recover the oil as it drifts.
- To collect the oil in shallow water, it may be necessary to corral the oil and bring it to deeper water or low-current areas with better skimmer access.

Ship Containment

- When anchoring boom around the ship, leave space between the two for oil accumulation.
- Multiple anchors improve the holding capacity and the configuration of the boom; boom pushed against the hull will be completely ineffective.
- The bow of an anchored ship will face into the prevailing wind or current and shift accordingly. Booming must account for vessel swing.
- Large lengths of boom (2,000-5,000 feet) are often required for ship containment.
- Boat/manpower-intensive; requires highly skilled personnel. Access/egress to ship must be coordinated.

3230 On-Water Recovery Group

The On-Water Recovery Group is responsible for managing water recovery operations per the Incident Action Plan.

Responsibilities include:

- Direct the delivery, deployment, and operation of skimmers.
- Provide a field status of skimming operations to the Operations Section Chief.
- Maintain estimates of product recovered.
- Identify field conditions related to the effectiveness of skimming operations.
- Identify logistics support needs for skimming operations.
- Ensure recovery and holding containers operate efficiently.

Open-water recovery includes using skimmers on oil slicks and netting systems for tar balls and highly viscous oils. Skimming of uncontained slicks can consist of either self-propelled skimming vessels or towed skimmer units. Storage capability and time needed to offload are very important considerations in determining the effectiveness of oil recovery by skimmers.

Frequently, skimming is the only option in areas with very strong currents and water too deep to anchor booms. Skimmers are most effective on thick slicks or areas such as convergence zones where the oil tends to accumulate in thicker concentrations. If the spilled oil emulsifies, skimmer performance usually decreases significantly.

In areas of shallow water or strong currents, it may be possible to collect or corral the oil and bring it to deeper water or low-current areas that have better skimmer access and higher recovery rates.

For spills where the oil is highly viscous or has formed tar balls, netting systems may enhance oil recovery. Using technology adapted from the fishing industry, a net is either moored or towed, allowing the oil to be collected and recovered.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3230.1 Recovery Options

Many mechanical options exist for on-water recovery of oil, including but not limited to, skimming, dispersants, in-situ burn, skimming, and absorbent use. NOAA Office of Response and Restoration website is an excellent starting point for understanding the various mechanical options. The “SPILL TOOLS” application can assist in selecting and staging response equipment, deploying equipment as effectively as possible and a calculator to assist in comparing the performance from different kinds of equipment or deployment strategies

<http://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/responsetools/introduction-spill-tools.html>

3240 Shoreside Recovery Group

The Shoreline Recovery Group is responsible for managing shoreline cleanup operations as per the Incident Action Plan. Responsibilities include:

- Manage the personnel and equipment necessary to accomplish shore side recovery and cleanup objectives established in the Incident Action Plan.
- Report on the efficiency of shore side recovery and cleanup methods.
- Identify resource and logistics support needs.
- Project cleanup completion dates.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3240.1 Shoreline Cleanup Options

Based on the type of impact or anticipated impact, several approaches may be used.

- Manual: removal with small numbers of personnel, rakes, shovels, etc.
- Semi mechanical: removal-using trimmers to cut oiled grass and raking up debris.
- Mechanical: removal includes the use of ATV’s towing debris rakes and front-end loaders or road graders for use in removal of larger area of contamination.

See Section 4730.1 Shoreline Clean-up Assessment for Target Endpoints and Hierarchy of Clean-up Points.

3240.2 Pre-Beach Cleanup

Pre-beach cleanup may include removal of debris, trash, and cutting back grasses where permissible to limit the amount of possible contamination.

This type of activity is one that can be conducted through the Volunteer Coordinator .

3240.3 Storage

Ample storage is necessary to enable oily debris to be collected safely and securely at the spill location(s). Storage can be limited to a few 55-gallon drums or can include tanks, bladders, or tank trucks for large operations. Small barges can also be anchored just offshore or beached at low tide. When selecting a medium for storage, it is essential that the selected container is compatible with the material being recovered and stored.

Roll-on/roll-off dumpsters can be used to collect large amounts of oily debris, while salvage drums can be used for smaller quantities. In either case, it is essential that the drum be capable of decontamination for re-use or in the case of a dumpster or a similar large container, that it be lined with a suitable plastic material to prevent further contamination.

Refer to: http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

3250 Disposal Group

The Disposal Group is responsible for coordinating the on-site activities of personnel engaged in collecting, storing, transporting, monitoring, temporary storage, recycling, and disposal of all response wastes.

It is the responsibility of the FOSC to ensure that any recovered oil or hazardous substance is disposed of properly once cleanup has occurred. The Resource, Conservation and Recovery Act (RCRA) and its implementing regulations contained in Title 40, Code of Federal Regulations are quite specific in defining what is hazardous waste and how it should be handled and disposed. Also, State permit(s) for disposal of any solid waste will need to be granted/issued prior to removal from collection points. 40 CFR 261, Subpart C lists the characteristics a substance must exhibit to be considered hazardous.

See Section 9240.1 Cleanup Companies
Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3250.1 Waste Management and Temporary Storage Options

Several factors must be taken into account when oily debris/waste begin to accumulate at a spill site:

- Amount of room to store waste containers;
- Proximity to waterway in the event a container leaks;
- Accessibility to roads and highways;
- Proximity to spill site to minimize travel for responders.

Also, when a waste storage location is established, particularly during a lengthy incident response, extra steps may need to be taken. There must be routine monitoring to ensure that the container size is appropriate, that the containers are leak free, that the plastic liners are secure, and that materials are removed promptly on a regular basis.

3250.2 Decanting Policy

The Unified Command must approve any request for decanting that arises during a response. Large quantities of oily fluids are typically generated during an oil spill response. These fluids include the products of skimming and vacuuming operations, and are usually mostly water. Oil recovery operations can continue only as long as there is some place to store the recovered fluids. Once the field storage capacity is reached, skimming operations must terminate until additional storage is provided.

Recovered oil and water mixtures will typically separate into distinct phases when left in a quiescent state. When separation occurs the relatively clean water phase can be siphoned or decanted back to the recovery point with minimal, if any impact. Decanting therefore increases the effective on-site storage capacity and equipment operating time. Because this process risks discharge of oil already recovered, it must be done carefully. Typically decanting water is discharged into a secondary storage container or into a boomed area where any accidentally discharged oil can be contained and recovered.

In addition to vacuum trucks, recovered oil may be temporarily stored and decanted in the field using other containers including:

- Tank trucks
- Portable tanks
- Portable bladders
- Oil field fractionation tanks
- Lined pits
- Rail Cars

3250.3 Disposal Unit

- Direct the collection, temporary storage, transportation, recycling, and disposal of recovered wastes.
- Estimate the volume of waste that may be recovered and ensure adequate resources and logistics support are provided.

- Manage temporary storage sites and prevent secondary discharges or cross contamination.
- Confirm the laboratory results characterizing the wastes as hazardous or nonhazardous and prepare required RCRA manifests as required.
- Confirm the capacities of recycling or disposal sites.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3250.4 Disposal Procedure

- Federal, State and local laws/regulations;
- Volume of oil or hazardous substance for disposal;
- Identify disposal locations (onsite vs. offsite);
- Obtain necessary permits;
- Secure transportation for product disposal;
- Outline disposal plan.

3250.5 Disposal Guidance

In addition to the value of the product, liability for damage caused by spilled product, and the cost of cleanup, the cost of disposal is good reason to attempt to prevent spills. Such factors also give good reason to quickly eliminate the source of an accidental release and to contain and recover for use as much as possible of the spilled product.

The Resource Conservation and Recovery Act (RCRA), found in 40 CFR 260-266 & 270, is intended to promote the protection of health and the environment, and to conserve valuable material and energy resources by providing guidelines for solid waste collection, transportation, separation, recovery, and disposal practices and systems.

Waste Disposal Plan Under Development by contingency Planning Department.

3255 Florida Statutes

The 1990 Florida Legislature enacted major changes to the State's oil spill response and cleanup laws. Among the changes was the following directive to the Florida Department of Environmental Protection (FDEP) concerning the disposal of oil spill cleanup generated debris:

Chapter 376.304 (2) Florida Statutes states:

The Department of Environmental Protection is authorized to review and analyze the disposal materials or by-products used or resulting from the cleanup of the release of

pollutants in the waters of the state. Such materials that are determined by the Department not to require extraordinary handling or disposal requirements may be designated for disposal in nearby existing, local government, solid waste disposal facilities where such facilities are determined to be designed and operated in a manner where disposal of such materials would not constitute an unreasonable risk to public health and the environment. Such designation by the Department shall not be disallowed by actions of the local government responsible for operating the solid waste disposal facility. The designation by the Department of a local government's solid waste facility as the location for disposing of materials and by-products resulting from the activities essential to the cleanup of pollutants in the waters of the state shall constitute final agency action subject to review pursuant to chapter 120, Florida Statutes.

[Alabama Statutes – Information needed](#)

[Mississippi Statutes – Information needed](#)

Pre-Designation of Solid Waste Facilities for Debris Disposal:

In order to be prepared to properly manage the debris that could be generated from the cleanup of any significant or catastrophic release of pollutants in the waters of the state, the state will pre-designate all suitable municipal solid waste facilities, coastal and inland, that are in compliance, and meet screening criteria developed in the "Final Report of Oil Spill Debris Disposal Study", for potential use as debris staging areas and disposal of suitable waste from the debris. See Section 9230.5 Class I Landfills for a list of pre-designated facilities.

In The Event of a Significant Spill:

The nearest designated facility, or several facilities if necessary, would be utilized as the recommended staging area for segregation and stockpiling of debris, unless a suitable commercial or private facility is available and preferred by the Responsible Party, or if the spill debris can be staged in the immediate vicinity of the spill affected area, such as on the beach above high water.

Law requires reporting any and all oil/hazardous material spills via the State warning system if available or (800) 424-8802 to provide guidance to the Responsible Party and the Federal On-Scene Coordinator during the spill cleanup operations so that the debris collected is segregated, to the extent possible, into categories of waste disposal method.

As much of the waste debris, as can be determined, will be directed to appropriate facilities for disposal. The remaining debris will be sent to the selected staging area(s) for further characterization and storage, while additional waste disposal options are being reviewed.

- Debris suitable for disposal in solid waste facilities should first be directed to those facilities in the county or counties experiencing the spill.
- If the amount of debris is such that no single facility could manage it properly, the according state will recommend additional nearby facilities to share the burden of the waste.

- The state Waste program administrator will designate a lead District contact for the duration of the cleanup and disposal effort.
- The State Emergency Response Section will designate a lead disposal contact for the Federal On Scene Coordinator (FOOSC) and the Responsible Party's representative.
- A list of privately owned Landfills will also be provided to the FOOSC and the Responsible Party.
- The Final Report of Oil Spill Debris Disposal Study should be used as a reference for determining suitable facilities for oil spill debris disposal.
- The Guidelines for Assessment and Remediation of Petroleum Contaminated Soils should be used as a reference regarding the level of contamination that is suitable for municipal landfill disposal.
- A Directory of Refuse to Energy Facilities, and approved Thermal Treatment Facilities with the appropriate contact persons and telephone numbers will be maintained to assist in predetermining the types and volumes of waste acceptable at these facilities.

General Disposal Guidelines:

- Liquid waste petroleum product - recycle or reuse.
- Liquid waste petroleum product and water mixture - oil and water separator, then:
- Oil to recycler or re-refiner / water to POTW.
- Oil contaminated organic debris (sorbents, wood, plant material) - Refuse to Energy or

Thermal Treatment Facilities.

- Oil contaminated sand, (saturated) - Thermal Treatment Facility or soil washing technology.
- Disposal options are described by the "Guidelines for Assessment and Remediation of Petroleum Contaminated Soil."
- Oil contaminated sand, (not saturated) - Designated Landfill to be used as cover material. Also should follow "Guidelines for Assessment and Remediation of Petroleum Contaminated Soil."

3260 Decontamination Group

The Decontamination Group is responsible for decontamination of personnel and response equipment in compliance with approved statutes. Each incident may require different decontamination operations. The nature of the incident, the type of oil, the weather, the temperature, the number of people to be decontaminated, and the number of

trained personnel available are a few of the factors which dictate the size, method, and type of decontamination operation required. Responsibilities include:

- Identify decontamination needs and provide resources to accomplish required cleaning and decontamination of personnel and equipment.
- Identify resource and logistics needs to accomplish decontamination requirements

Basic decontamination guidelines include:

- Establish and clearly identify the Decontamination Corridor. The best location for a decon station would be uphill from the hot zone, and upwind so that airborne contaminants blow back toward the hot zone. If the wind changes, the decon station may have to be relocated
- The Decontamination Zone should be accessible to emergency medical units.
- Clearly identify the Decontamination Corridor using barrier tape, delineator posts and traffic cones.
- Establish and clearly identify the point of entry from the Hot Zone into the Warm Zone and the exit corridor into the Cold zone.
- Weather conditions will be a significant factor during decon operations. Suitable shelter (tents) should be utilized for inclement weather conditions.
- Water used during decon procedures must be carefully controlled and kept to a Minimum

Water generated from decontamination procedures will always be treated as hazardous waste.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3270 Dispersants

Please refer to Section 1670.1. Also see below guidance.

Refer to Regional Response Team Region IV Dispersant Use Policy. (http://www.nrt.org/Production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm) Also refer to Section II (Pre-Authorization of Dispersant Use) Dispersant Use In Region IV. ([http://www.nrt.org/production/NRT/RRTHome.nsf/Resources/DUP/\\$file/3-RRT4DispersantUsePlan.doc](http://www.nrt.org/production/NRT/RRTHome.nsf/Resources/DUP/$file/3-RRT4DispersantUsePlan.doc)).

The use of sinking agents is expressly prohibited by the National Contingency Plan.

3270.3 SMART Monitoring

When dispersants are used during spill response, the Unified Command needs to know whether the operation is effective in dispersing the oil. The dispersant monitoring module of NOAA's Special Monitoring of Applied Response Technologies (SMART) Protocol is designed to provide the Unified Command with real-time feedback on the efficacy of dispersant application. Data collected in Tier III of the SMART dispersant protocol may be useful for evaluating the dilution and transport of the dispersed oil. **SMART does not monitor the fate, effects, or impacts of dispersed oil.**

Dispersant operations and the need to monitor them vary greatly. Therefore, SMART recommends three levels (or tiers) of monitoring.

(1) Tier I employs the simplest operation, visual monitoring, which may be coupled with Infra-Red Thermal Imaging or other remote detection methods.

(2) Tier II combines visual monitoring with on-water teams conducting real-time water column monitoring at a single depth, with water-sample collection for later analysis.

While fluorometry remains the most technologically advantageous detection method, other approaches may be considered. The performance-based guidelines provided in attachment 10 define SMART Dispersant Module Criteria for instrument selection and validation.

(3) Tier III expands on-water monitoring to meet the information needs of the Unified Command. It may include monitoring at multiple depths, the use of a portable water laboratory, and/or additional water sampling. Tier III monitoring might for example include the redeployment of the monitoring team to a sensitive resource (such as near a coral reef system) as either a protection strategy or to monitor for evidence of exposure. In addition, Tier III might include the use of the monitoring package for activities unrelated to actual dispersant operations such as monitoring of natural dispersion or to support surface washing activities where water column concerns have been identified. Any Tier III operation will be conducted with additional scientific input from the Unified Command to determine both feasibility and help direct field activities. The Scientific Support Coordinator or other Technical Specialists would assist the SMART Monitoring Team in achieving such alternative monitoring goals.

The SMART Protocol can be found in its entirety at:
<http://response.restoration.noaa.gov/smart>.

The U.S. Coast Guard Gulf Strike Team has personnel trained in the SMART Protocol and maintains SMART monitoring equipment available to deploy in support of dispersant operations at the request of an FOOSC.

The Region IV Regional Response Team policy statement dated April 1995 explains in detail the factors to be evaluated when the RRT is considering the use of in-situ burning.

Appendix VI of the Region IV in-situ Burn Policy provides a decision tree intended for the OSC and SSC to use in evaluating an in situ burn.

The Regional Response Team Region IV

(http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm) – In-Situ Burn Policy. Information on in-situ burning equipment is found in Appendix V of the In-Situ Burn Plan heading.

The volume of oil that can be removed by in-situ burning is the primary benefit to this countermeasure. In August of 1993, a joint US/Canada in-situ burning experiment off the coast of Newfoundland burned 12,760 gallons of Alberta Crude in 90 minutes with 99% efficiency. Considerable research has been presented on the theory and practical application of in situ burning. Through this research, the following parameters have been developed:

- In situ burning of uncontained oil is usually not effective. The oil slick must be a minimum of 0.11 inches (2 mm) thick for effective ignition. While uncontained oil can be ignited, the burn efficiency will be significantly lower than that of contained oil.
- If the slick thickness is greater than 0.11 inches, almost any type of oil can be ignited and burned in-situ. Under extreme weather conditions, heavy weathering of the oil and significant emulsification of the oil are factors that make ignition and burning more difficult. High viscosity oils will burn well once ignited.
- In situ burning is very time sensitive. Emulsification of the oil makes it more difficult to ignite. Although emulsions up to 70% water will ignite under the correct conditions, burn efficiencies will be reduced.
- The normal upper environmental limits for ignition are winds of 20 knots or less and seas of 4 feet or less. Fresh or un-emulsified oil can usually be ignited at well above these limits.
- In situ burning reduces the slick thickness about 0.1 inches (2 mm) per minute or about 0.07 gallon per minute per square foot of oil.

3280.1 Pre-Authorization of In-Situ Burning

The term "in-situ burning" applies to operations conducted for removal of oil by burning. These operations may apply during daylight or nighttime hours. In-situ burning operations will be conducted within the jurisdiction of the RRT IV region in accordance with this agreement and, in addition, where applicable, in accordance with protocols established in Letters of Agreement (LOA) between the USCG, EPA, DOI, DOC, and the affected state(s). The authority to authorize the use of in-situ burning provided under this Agreement to the USCG OSC may not be delegated.

The following three zones have been established to specify pre-authorized locations and conditions under which burning may occur:

(1) "A" ZONES - PRE-AUTHORIZATION FOR OPEN-WATER BURNING

The "A" zone is defined as any area in Region IV, falling exclusively under federal jurisdiction; and not classified as a "B", or "R" zone; which is at least 3 miles seaward from any state coastline; and seaward of any state waters, or as designated by separate LOAs with each individual state, the USCG, EPA, DOI, and DOC. In the event that state jurisdiction extends beyond 3 miles from a state shoreline, pre-approval for the "A" zone applies only to those areas outside state jurisdiction unless a LOA is in place and specifically pre-authorizes in-situ burning within those state waters.

Within "A" zones, the USCG, EPA, DOC, DOI, and the state(s) agree that the decision to use in-situ burning rests solely with the pre-designated USCG OSC, and that no further approval, concurrence or consultation on the part of the USCG or the USCG OSC with EPA, DOC, DOI, or the state(s) is required.

The USCG agrees with EPA, DOC, DOI, and the state(s) that the USCG will immediately notify said agencies and affected state(s) of a decision to conduct burning within the "A" zone, via RRT IV representatives.

(2) "B" ZONES - WATERS REQUIRING CASE-BY-CASE APPROVAL

A "B" zone is defined as any area in the RRT IV region falling under state or special management jurisdiction which is not classified as an "A", or "R" zone.

"B" zones are all areas falling:

- (a) anywhere within state waters,
- (b) waters less than 30 feet in depth that contain living reefs,
- (c) waters designated as a marine reserve, National Marine Sanctuary, National or State Wildlife Refuge, unit of the National Park Service, proposed or designated Critical Habitats, and (d) mangrove areas, or coastal wetlands. Coastal wetlands include submerged algal beds and submerged sea grass beds.

Where a LOA is in effect between the USCG, EPA, DOI, DOC, and the affected state(s); the policy for pre-authorization established under the provisions of said LOA shall preempt the policy herein established for zones otherwise designated as falling in the "B" zone. Established LOAs are provided in Appendix II of this document. In the event that a

Letter of Agreement is not in effect for areas falling within the "B" zone, the following protocols shall apply:

- (a) If the OSC feels that in-situ burning should be used in areas falling in a "B" zone, a request for authorization must be submitted to the RRT and the affected state(s), along with the required information listed in the in-situ burning Application\Checklist form, found in Appendix VI.
- (b) The OSC's decision to use in-situ burning shall be made after consulting with RRT IV representatives of state and federal trustee agencies to ensure that the best available information pertaining to the presence or absence of natural resources at the burn site is obtained.
- (c) The OSC is only granted authority to conduct in-situ burning in the "B" zone when consent has been given by EPA and the affected state(s) and after consultation with, DOI and DOC.
- (d) The RRT IV will respond to the OSC's request for authorization to burn in zone "B" within four hours from time of notification. If the RRT IV has not responded to a request for authorization to burn in zone "B" within four hours, then the OSC may proceed with in-situ burn operations.

The USCG agrees with EPA, DOC, DOI, and the state(s) that the USCG will immediately notify said agencies and affected state(s) of a decision to initiate an approved burn within a "B" zone via RRT IV representatives.

(3) "R" ZONES - EXCLUSION ZONES

An "R" zone is defined as any area in the RRT IV region falling under state or special management jurisdiction which is not classified as an "A" or "B" zone.

The "R" zone is that area designated by the RRT IV as an exclusion zone. No in-situ burning operations will be conducted in the "R" zone unless 1) in-situ burning is necessary to prevent or mitigate a risk to human health and safety; and/or 2) an emergency modification of this agreement is made on an incident-specific basis.

RRT IV currently has not designated any areas as "R" zones, but retains the right to include areas for exclusion at a future point in time if it feels this is warranted.

3280.2 Protocols

The Application\Checklist form in Appendix VI of the In-Situ Burn Plan ([http://www.nrt.org/production/NRT/RRTHome.nsf/Resources/BIP/\\$file/1-RRT4In-SituBurnPlan.doc](http://www.nrt.org/production/NRT/RRTHome.nsf/Resources/BIP/$file/1-RRT4In-SituBurnPlan.doc)) **shall be completed for all burns and provided to RRT IV members in a timely manner for documentation and informational purposes.**

The following requirements apply to the use of all burning operations under the provisions of this policy:

(1) Health and Safety Concerns - Operators: Assuring workers' health and safety is the responsibility of employers and the USCG OSC who must comply with all Occupational Health and Safety Administration (OSHA) regulations. Prior to any insitu burn operations, a site safety plan must be submitted and approved by the OSC.

Public: The burning should be stopped if it is determined that it becomes an unacceptable health hazard due to operational or smoke exposure concerns to responders or the general public. If at any time, exposure limits are expected to exceed national federal air quality standards in nearby populated areas, as a result of in-situ burning operations, then in-situ burning operations will immediately cease. The Level of Concern (LOC) for particulates for the general public in the RRT IV region is 150 ug/m³ (PM-10) averaged over 1 hour.

(2) Monitors representing the USCG, EPA, federal trustee agencies, the affected state(s), OSHA, and the responsible party will have the opportunity to observe in-situ burning operations. Monitoring to establish "Continue/Discontinue" data for input to the OSC will be conducted in accordance with protocols established by the Region IV Regional Response Team and as outlined in the monitoring program contained in appendix VI. Unless smoke plumes are predicted to cross over populated or environmentally sensitive areas, an inability to conduct monitoring operations will not be automatic grounds for discontinuing or prohibiting in-situ burn operations. All burns must incorporate visual monitoring at the burn site to record the disposition of burn residues and to monitor the burn site for potential impact to any natural resource in the area. Samples of the residue will be collected if feasible.

(3) Prior to any in-situ burning operations, the OSC will apply the decision tree contained in Appendix VI.

(4) The USCG will make every reasonable effort to continuously evaluate the decision to burn, and allow RRT agencies and affected state(s) the opportunity to comment. Formal requests to discontinue a burn should be presented, in writing, to the OSC for consideration.

(5) Burning will be conducted in a way that allows for effective control of the burn, to the maximum extent feasible, including the ability to rapidly stop the burn if necessary. Contained and controlled burning is recognized as the preferred method of burning using fire-resistant boom. All practical efforts will be made to control and contain the burn and prevent accidental ignition of the source. Generally it is not recommended that the source or adjacent uncontained slicks be allowed to ignite during in-situ burning operations. Certain circumstances, however, may warrant consideration of carefully planned source ignition.

(6) Mechanical recovery equipment shall be mobilized on-scene, when feasible, for backup and complimentary response capability. Provisions must be made for collection of burn residue following the burn(s).

(7) In-situ burning will be conducted in accordance with any consultations approved by the USFWS and the NMFS, under Section 7 of the Endangered Species Act. Prior to beginning an in-situ burn, an on-site survey will be conducted to determine if any

threatened or endangered species are present in the burn area or otherwise at risk from any burn operations, fire, or smoke. Appropriate natural resource specialists, knowledgeable with any special resource concern in the area and representing the resource trustee, will be consulted prior to conducting any in-situ burn. Measures will be taken to prevent risk of injury to any wildlife, especially endangered or threatened species. Examples of potential protection measures may include: moving the location of the burn to an area where listed species are not present; temporary employment of hazing techniques, if effective; and physical removal of individuals of listed species only under the authority of the trustee agency.

(8) In-situ burning is advised only when the meteorological and sea conditions are operationally favorable for a successful burn. The OSC will give due consideration to the direction of the wind, and the possibility of the wind blowing precipitate over population centers or sensitive resources onshore. A safety margin of 45 degrees of arc on either side of predicted wind vectors should be considered for shifts in wind direction.

(9) Any use of in-situ burning requires that a post-incident report be provided by the OSC, or a designated member of the OSC's staff, within 45 days of in-situ burning operations. Recommendations for changes or modification to this policy should be presented in the report, if appropriate. This report will be presented at a Region IV RRT meeting, if requested by the RRT.

3280.3 SMART Monitoring

In-situ burning of oil may offer a logistically simple, rapid, and relatively safe means for reducing the net environmental impact of an oil spill. Because a large portion of the oil is converted to gaseous combustion products, in-situ burning can substantially reduce the need for collection, storage, transport, and disposal of recovered material. In-situ burning, however, has several disadvantages: burning can take place only when the oil is not significantly emulsified, when wind and sea conditions are calm, and when dedicated equipment is available. In addition, in-situ burning emits a plume of black smoke, composed primarily (80-85%) of carbon dioxide and water; the remainder of the plume is gases and particulates, mostly black carbon particulates, known as soot. These soot particulates give the smoke its dark color. Downwind of the fire, the gases dissipate to acceptable levels relatively quickly. The main public health concern is the particulates in the smoke plume.

With the acceptance of in-situ burning as a spill response option, concerns have been raised regarding the possible effects of the particulates in the smoke plume on the general public downwind. NOAA's Special Monitoring of Applied Response Technologies (SMART) Protocol should be used to monitor in-situ burning operations. SMART is designed to address these concerns and better aid the Unified Command in decisions related to initiating, continuing, or terminating in-situ burning.

The SMART Protocol can be found in its entirety at:
<http://response.restoration.noaa.gov/smart>.

The U.S. Coast Guard Gulf Strike Team has personnel trained in the SMART Protocol and maintains SMART monitoring equipment available to deploy in support of in-situ burning operations at the request of an FOSC.

3290 Bioremediation

Biodegradation is a natural process in which microorganisms chemically alter and breakdown organic molecules into other substances - such as fatty acids, carbon dioxide and water - in order to obtain energy and nutrients. The basis for this process is relatively simple: microorganisms require minerals and sources of carbon, as well as water and other elements, to survive and function. The process can involve one step or a series of steps that proceed through the formation of molecules with successively fewer carbons. Generally, the extent to which a particular organic molecule is biodegradable and the rate of degradation depend on the molecule's structural characteristics (chain length, amount of branching, number and arrangement of rings, stereochemistry) and the environmental conditions (temperature, available oxygen, substrate).

Bioremediation is a treatment technology that utilizes biodegradation to reduce the concentration and/or toxicity of chemical substances such as petroleum products and other hydrocarbons. Because microbes capable of degrading hydrocarbons are commonly found in nature, most untreated hydrocarbon spills eventually are removed from the environment by microbial degradation and other processes. Enhanced bioremediation, however, seeks to accelerate natural biodegradation processes by applying specially chosen nutrients and/or microbes to spilled substances. Although microbes have been used extensively and successfully for many years to treat wastes and wastewater in controlled facilities, their potential as a tool for responding to spills of oil and hazardous substances in uncontrolled environments has only more recently received significant interest.

The RRT IV Bioremediation Plan presents a plan for considering and implementing bioremediation, through either natural attenuation or nutrient/microbe enhancement. It was developed through the coordinated efforts of EPA's Subcommittee on National Bioremediation Spill Response and the members of the Region 4 Regional Response Team (RRT), using EPA's Interim Guidelines for Preparing Bioremediation Spill Response Plans.

The RRT IV Bioremediation Plan can be found at:

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

FOSC Strategy Checklist:

1. Evaluate level of response needed for incident (ref RP's VRP or FRP)

a. Most probable discharge

b. Maximum most probable discharge

c. Worst case discharge

2. Evaluate if special circumstances exist requiring special action.

a. Fire/explosion

b. Vessel grounding

c. Lightering operations

d. Salvage operations

3. Implement support infrastructure.

Determine response structure that will be used, and from there determine level of support needed to fill positions in the structure. Forward needs to Resource Unit Leader.

4. Mobilization of personnel

Determine personnel needed for response, and identify source of personnel. Ensure personnel are properly trained, and health and safety issues are addressed.

a. Special Teams

b. Reserve augmentation

c. District Response Group (DRG) support

d. Spills of National Significance (SONS) augmentation

5. Mobilization of equipment

a. Type of equipment needed

b. Quantity

c. Location - staging area

d. Support needed

(1) Boats for hauling and positioning boom

(2) Aircraft support for transporting equipment

e. Additional requirements

f. Contact list

g. Forward equipment needs to Resource Unit Leader

6. Logistics

a. Logistics needed to support personnel

(1) Food

(2) Lodging

(3) Additional clothing

(4) Transportation

b. Logistics needed to support response

(1) Adequate communications

(2) Command post - Establish command post in location to support response. Command post must be adequate in size to support the anticipated number of personnel.

(3) Air support (overflights)

(a) Coast Guard and Auxiliary

(b) Other agencies

(c) Private sources

7. Local impacts

a. Impact on water intakes

(1) Drinking water

(2) Industrial

b. Transportation of fresh water supply

8. Funding issues

a. On Scene Coordinator (OSC) access to the fund

b. State access to the fund

c. Vendors - Basic Ordering Agreement (BOA) policy

9. Volunteers

10. Fish, wildlife and habitat protection and mitigation of damage

11. Ensure coordination with natural resource damage assessment personnel

The Emergency Response Branch is responsible for overseeing and implementing emergency measures to protect life, mitigate further damage to the environment, and stabilize the situation.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3310 Search and Rescue (SAR) Group

Search and Rescue (SAR) efforts primarily focus finding and assisting persons in actual or apparent distress and are carried out within a well defined SAR response system.

Key response areas:

Operational Support / Coordination

- Search Planning & Operations Safety
- Rescue Planning & Operations Stress Management
- Medical / Triage Liaison with victims family
- Fire Fighting Security
- Shoreline Search and Rescue Investigations
- On-Water Search and Recovery Resources
- Political
- Assisting & Cooperating Agencies
- Public Information
- Command Post Needs

Monitor how well the incident objectives, strategies, and tactics are addressing the key response areas identified above and adjust, as necessary, to ensure the maximum potential for the best possible response.

Refer to Appendices 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.

3310.1 Search and Rescue Area Resources

The Search and Rescue (SAR) Group is responsible for prioritization and coordination of all SAR resources directly related to the specific incident. In addition to the CG Stations within the Sector Mobile AOR additional resources can be found in Section: [9234.2](#)

[Local](#)

[Law Enforcement Agencies.](#)

3320 Salvage Group

The Salvage Group is responsible for coordinating and directing salvage activities and source control related to the incident.

Salvage Survey Checklist:

Vessels Name: _____ Official _____
Number: _____
Vessel Type: _____ Flag: _____

Owner/Operator: _____ Ph. _____
Builder: _____
Class Society: _____ Year: _____
L _____ B _____ D _____
Brief description of casualty:
a. Date/Time of casualty: _____
b. Extent of damage: _____
c. Hazardous Cargo Spill? _____
d. Structural details (double bottom): _____
e. Number of Tanks/Holds (tank soundings): _____
f. Drafts (strandings) before Fwd: ____ Aft: ____
g. Drafts (strandings) after Fwd: ____ Aft: ____
h. Tides at time of casualty: _____
i. Type of bottom (mud, sand): _____
j. Condition of vessel's propulsion: _____

Aim/Intent of salvage operation: _____

- If vessel is foreign flag, then USCG will need plans such as Lines Plan, General Arrangement, Tank Tables, T&S Booklet, etc... for detailed calculations.

See Section: 9240.3 Firefighting / Salvage / Divers

3330 Marine Fire Fighting Group

The response and organizational structure to a marine fire can vary widely depending on the location of the vessel and proximity to fire fighting resources, capabilities of the municipal and industrial fire departments, type of vessel, nature of the cargo, and source of the fire.

Although the Coast Guard does not directly conduct fire fighting, it does have a major role in coordination and support.

A marine fire can bring to the scene fire departments, law enforcement, public health, technical cargo experts, industrial fire departments, private fire fighting and salvage experts.

See Section: 9236.1 County Fire Departments or additional marine fire fighting resources.

For further information see section: 8000 Marine Fire Fighting Plan (Section Under Development).

3340 Hazardous Materials Group

The Hazardous Material Group is responsible for coordinating and directing all hazardous material activities related to the incident.

See Section: 7000 Hazardous Material for further information (Section Under Development)

3350 Medical Group

The Medical Group is responsible for coordinating and directing all emergency medical services related to the incident.

3360 Law Enforcement Group

The Law Enforcement Group is responsible for coordinating with federal/state/local law enforcement activities related to the incident, which include, but are not limited to isolating the incident, crowd control, traffic control, evacuations, beach closures, and/or perimeter security.

See Section: 9234.1 County Law Enforcement Agencies

3400 Air Operations Branch

The Air Operations Branch is responsible for preparing and implementing the air operations portion of the Incident Action Plan and providing logistical support to aircraft. Aircraft landing sites information can be obtained through:

[Sections 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies.](#)

3410 Air Tactical Group

The Air Tactical Group Supervisor is primarily responsible for the coordination and scheduling of aircraft operations. Such operations may be intended to locate, observe, and track; support dispersant applications or other response application techniques; or report on the incident situation when fixed and/or rotary-wing aircraft are airborne at the site. The Air Tactical Group Supervisor performs these coordination activities while assets are airborne. The Air Tactical Group Supervisor reports to the Air Operations Branch Director and updates the Situation Unit Leader.

3410.1 Aerial Surveillance Unit

- Direct and coordinate air operations missions to conduct oil spill tracking, observation, and remote sensing.
- Coordinate mission tasking with scientific and technical observers.
- Identify additional resources and logistics needs.
- Report oil spill tracking, observation, and remote sensing results and coordinate observations to direct operational activities.

Spotter Aircraft

The Spotter Aircraft Position or "Spotter" is physically located in an aircraft. The Spotter is a person who "spots" or controls, guides, or lines up the sprayer aircraft or vessels over the spill target. Because a dispersant application can be made by both vessels and aircraft, the Spotter would maintain tactical control over both types of delivery systems. The Spotter is in charge of the dispersant operation on scene. Because dispersant operations can be executed in multiple geographic areas due to the spreading and breakup of the slick, multiple spotter aircraft may be needed (one for each spray a/c).

Monitor Aircraft

The monitor aircraft or vessel or the "monitor" is primarily responsible for monitoring the effectiveness of the dispersant operation through aerial observation in aircraft and through the use of fluorometers on board vessels to sample the dispersed oil.

Effectiveness monitoring is concerned primarily with determining whether the dispersant was properly applied and how the dispersant is affecting the oil.

Observation Aircraft

The observation aircraft or vessels "observers" are platforms and persons specifically assigned to observe the dispersant operation. Their observer status should be authorized by the Unified command on the basis of their position as a stakeholder in the outcome of the operation. Observers might include corporate officials, agency representatives, political officials, scientists, trustees, interest group representatives, and so forth.

3410.2 Aerial Applications Unit

The Spray Aircraft or Vessel or "Sprayer" is the delivery system of the dispersants to the oil slick. The dispersant application can be either water-borne or airborne depending on the size of the spill and/or dispersant operation complexity. In both cases the "sprayer" reports to and receives tasking from the spotter aircraft. Because dispersant operations can be executed in multiple geographic areas due to the spreading and breakup of the slick, multiple "sprayer" aircraft or vessels may be needed.

Responsibilities include:

- Conduct air operations missions to apply dispersants, chemical countermeasures, bioremediation, or other alternative response technologies as directed by the Operations Section Chief.
- Identify additional resources and logistics needs.
- Report on the efficacy of alternative response technology applications

3410.3 Procedures for Temporary Flight Restrictions

Due to the presence of three major and several regional airports in this area, it is necessary to be aware of possible interference with airspace even for a 'routine overflight'.

In all cases, the Federal Aviation Administration (FAA) and/or nearest airport that could be affected should be contacted.

NOTAMs or similar advisories can be posted/broadcasted by the FAA to alert aviators of possible environmental hazards. Likewise, response personnel and media engaged in assessment or follow-up surveillance of a spill site, need to be fully aware of FAA or DOD controlled airspace and any hazards or restrictions that may exist.

Who can request a Temporary Flight Restriction (TFR)?

A TFR may be requested by various entities, including: military commands; federal security/intelligence agencies; regional directors of the Office of Emergency Planning, Civil Defense State Directors; civil authorities directing or coordinating organized relief

air operations (e.g., Office of Emergency Planning; law enforcement agencies; U.S. Forest Service; state aeronautical agencies); State Governor; FAA Flight Standards District Office, aviation event organizers, or sporting event officials.

Different Types of TFR's.

The FAA issues TFR's under the following regulations:

- (1) Section 91.137, Temporary Flight Restrictions in the Vicinity of Disaster/Hazard Areas;
- (2) Section 91.139, Emergency Air Traffic Rules;
- (3) Section 91.141, Flight Restrictions in the Proximity of the Presidential and Other Parties;
- (4) Section 91.143, Flight Limitation in the Proximity of Space Flight Operations;
- (5) Section 91.145, Management of Aircraft Operations in the Vicinity of Aerial Demonstrations and Major Sporting Events; and
- (6) Section 99.7, Special Security Instructions.

Who can issue a TFR?

FAA Headquarters or the Directors of Terminal or En Route and Oceanic Area Operations (or their designee) having jurisdiction over the area concerned may issue a TFR.

The Air Branch is responsible for facilitating the issuance of a TFR.

The following Link Provides more info: <http://www.faa.gov>

3420 Air Support Group

The Air Support Group Supervisor is responsible for supporting and managing Helibase and Helispot operations and maintaining liaison with Fixed- winged air bases. This includes:

- Providing fuel and other supplies.
- Providing maintenance and repair of helicopters.
- Keeping records of helicopter activity.
- Providing enforcement of safety regulations.

Helicopters during landing, takeoff, and while grounded, are under the control of the Air Support Group's Helibase or Helispot managers. The Air Support Group Supervisor reports to the Air Operations Branch Director.

3420.1 Airports / Helibases /Helispots

See Section: [5220.7 Airports / Heliports](#)

3420.5 Air Traffic Coordination Unit

- Direct and coordinate air operations as required by the Incident Operations Plan
- Prioritize and assign air ops missions.
- Request additional aircraft resources and release aircraft when authorized.
- Coordinate ground services and aircraft support.
- Identify additional resources and logistics needs.
- Report on the status of air operations.

3500 Staging Area Manager

Staging Areas are established by the Operations Section Chief. The Staging Area Manager is responsible for managing all activities within the designated staging areas and reports directly to the Operations Section Chief. Staging areas provide the ability to have tactical resources immediately available for deployment in the event that more resources are needed to manage the situation.

Some things to remember:

- Staging Areas are temporary locations where personnel and equipment are kept while awaiting tactical assignment
- An incident may have more than one staging area
- Resources in Staging must be immediately available for assignment
- All resource status shall be relayed to the Resources Unit Leader to determine if they are in excess to what is needed and should be demobilized
- Staging Areas are designed by the name that describes their general location (e.g. John Lloyd Park Staging)

3510 Pre-Identified Staging Areas

Additional locations can be found in Section: 5220.5 Staging Areas.

REFER TO THE MS, AL, & FL Panhandle Digital Area Contingency Plan, located at the following website: ocean.floridamarine.org/acp/mobacp/

This application is also available on DVD, and master documents and data are maintained by USCG Sector Mobile.

3520 Security

All Staging Areas should include perimeter security to prohibit un-authorized entry and safety to the workers. Security needs will be dependent on incident specific operations.

3600 Wildlife Branch

The Wildlife Branch is responsible for minimizing wildlife losses during spill response, coordinating early ground and aerial reconnaissance of wildlife at the spill site, employing wildlife hazing measures per the IAP, and recovering and rehabilitating impacted wildlife.

Rehabilitation activities shall be coordinated through the Unified Command (UC). The State and Federal OSC, working with the responsible party (if applicable), will provide guidance to the Operations section to ensure that all wildlife concerns of the public and appropriate trustees are addressed. Early initiation of wildlife rehabilitation activities within the Operations section will ensure adequate mobilization of staff, equipment and other applicable resources. The Wildlife Operations branch will be responsible for providing licensed, experienced rehabilitation personnel to coordinate and supervise all collection and rehabilitation activities. Untrained volunteers shall be trained and supervised by licensed rehabilitation personnel on the proper handling of wildlife as well as safety training including the use of personal protective equipment.

[Refer to Sections 9200 Personnel and Services Directory and 9700 List of Response References for Response Guidance and Strategies. \(Also refer to Regional Response Team Region IV for Best Responses for Wildlife Response\).](#)

See also any/all applicable Environmental Sensitivity Index(es) and Geographic Response Plan(s) for the region of impact.

The general public is normally highly sensitive to reports and pictures of oiled wildlife and large numbers of emergent volunteers should be expected

Engage the Liaison Officer as soon as possible if any reports of impacted wildlife are received.

3610 Fish and Wildlife Protection Options

In addition to wildlife initially impacted after the release or spill, continued exposure should be considered in planning due to migrating wildlife re-entering areas during the clean-up activities.

Several options available to the FOSC include hazing and capture/re-release. Any such measures should be evaluated through the Environmental Unit.

3620 Wildlife Recovery Group

The Wildlife Recovery Group is responsible for coordinating the search, collection and field tagging of dead and live impacted wildlife and transporting them to the processing center.

Responsibilities include:

- Direct, coordinate, and conduct wildlife recovery and capture operations.
- Maintain a central clearing point to direct recovered wildlife to appropriate rehabilitation facilities.
- Maintain evidence, tagging, and storage procedures for all wildlife recovered.
- Manage the capture, triage, first aid, and transportation of recovered wildlife.
- Provide training and briefing on actions and notifications required when response workers or members of the public encounter distressed wildlife.
- Identify resources and logistics support requirements.
- Report on wildlife recovery operations.

3620.1 Recovery Processing

Processing procedures will be specified as incident specific criteria dictates.

3630.2 Carcass Retrieval and Processing

The U.S. Fish and Wildlife Service is responsible for the disposition of all migratory birds, dead or alive.

3640 Wildlife Rehabilitation Group

The Wildlife Rehabilitation Group is responsible for receiving oiled wildlife at the processing center; recording essential information; collecting necessary samples; and conducting triage, stabilization, treatment, transport and rehabilitation of oiled animals.

Responsibilities include:

- Establish wildlife rehabilitation centers and conduct rehabilitation operations.
- Maintain documentation on wildlife delivered for rehabilitation.
- Store, document, coordinate laboratory analysis and necropsies, and properly handle deceased wildlife.
- Identify resources and logistics support requirements.

3640.1 Wildlife Rehabilitation Operations

Rehabilitation operations will be organized and coordinated as facility and incident specific criteria dictates.

3640.2 Rehabilitation Facilities

Rehabilitation facilities will be characterized as incident location dictates.

3640.3 Rehabilitation Procedures

The U.S. Fish and Wildlife Service's policy titled Best Practices for Migratory Bird Care During Oil Spill Response (November 2003) are to be used in evaluating capture methods; making informed choices during spill responses; and evaluating oiled bird rehabilitation activities to improve field practices. This document is RRT policy in Region 4 for acquiring the best achievable care for migratory birds during an oil spill response.

The following criteria will be used when considering and evaluating bird rehabilitators for conducting oiled-bird response.

- Hold all necessary permits for bird-related response activities;
- Experience in the capture, treatment, and care of oiled birds;
- Experience conducting bird-related response activities within the Incident Command System structure;
- Ability to quickly mobilize to perform bird capture, field evaluation, stabilization and transport, including remote locations if necessary;
- Access to appropriate facilities adequate for treating and housing oiled birds;
- Ability to establish and operate bird intake, holding, and isolation areas within 12-24 hours of wildlife response activation; and
- Ability to establish and operate bird cleaning and pre-release areas within 48 hours of wildlife response activation.
- Agreement with a licensed veterinarian, experienced in the treatment of oiled birds, to

provide any necessary veterinary medical care.

3640.4 species – Fl, Al, MS; section currently under revision

Manatees –

Dolphins and Whales -

Sea Turtles –

Coastal Birds –

3700 RESERVED

3800 RESERVED

3900 RESERVED for AREA / DISTRICT

4000 PLANNING

4000 PLANNING SECTION

The Planning Section is responsible for the collection, evaluation, and dissemination of tactical information related to the incident, and for the preparation and documentation of Action Plans. The section also maintains information on the current and forecasted situation, and on the status of resources assigned to the incident. Task Organization includes the Situation, Resource, Documentation, and Demobilization Units, as well as Technical Specialists.

Refer to the <http://homeport.uscg.mil/ics> for the Incident Management Handbook (IMH) and specific Job Aids and information on all Planning Section duties and positions including ICS forms.

The Operational Planning "P"

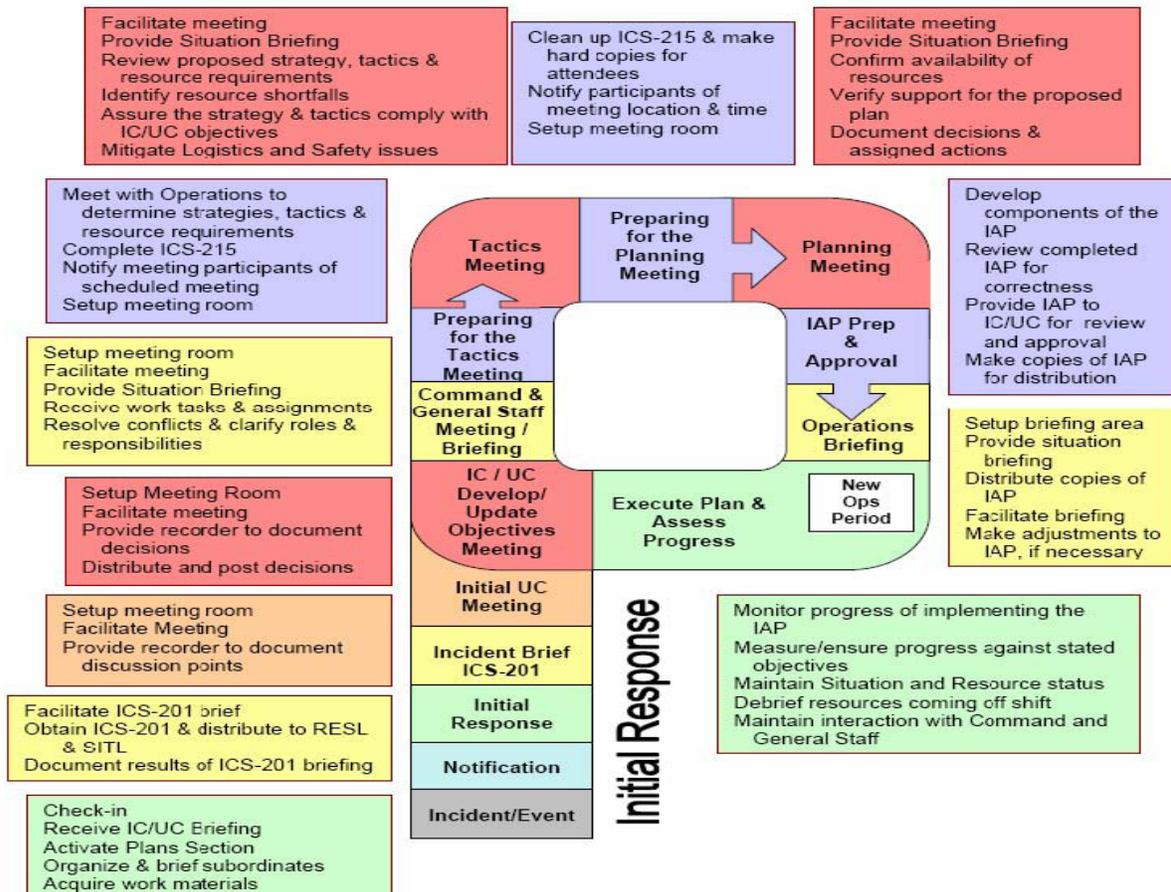


Figure 4110-1 Incident Planning Cycle

4110 Planning Cycle

4110.1 Initial Response and Assessment

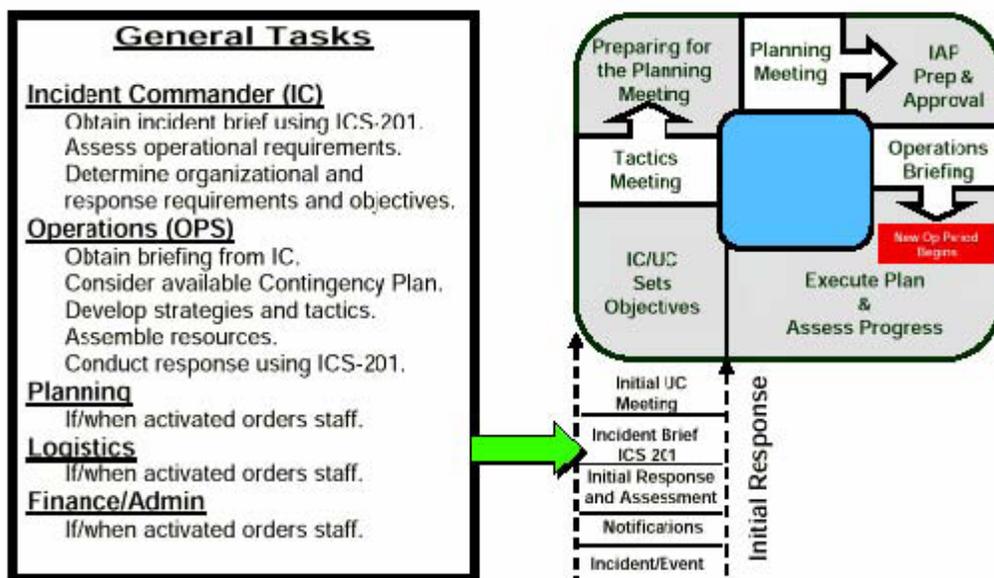
The period of *Initial Response and Assessment* occurs in all incidents. Short-term responses, which are small in scope and/or duration (e.g., a few resources working one operational period) can often be coordinated using only ICS Form 201 (Incident Briefing Form).

INCIDENT BRIEFING (ICS Form 201) - During the *transfer-of-command* process, an ICS Form 201-formatted briefing provides the incoming Incident Commander (IC)/Unified Commander (UC) with basic information on the incident resources and situation. Most importantly, the brief functions as the Incident Action Plan (IAP) for the initial response and remains in force and continues to develop until the response ends or the Planning Section generates the incident's first IAP. It is also suitable for briefing individuals newly assigned to the Command and General Staff as well as for needed assessment briefings for the staff. ICS Form 201 facilitates documentation of response objectives, situational awareness, resource employment and deployment, and documentation of significant actions taken. ICS Form 201 is essential for planning and the effective management of initial response activities.

When: New IC/UC.

Facilitator: Staff Briefing as required.

Attendees: Command and General Staff as required



Agenda:

Using ICS Form 201 as an outline, include:

- Situation (note territory, exposures, safety concerns, etc.; use map/charts).
- Current priorities.
- Strategy(s) and tactics.
- Current organization.
- Resource assignments.
- Resources en-route and/or ordered.
- Facilities established.

4110.3 Initial Unified Command Meeting

This meeting provides UC officials with an opportunity to discuss important issues prior to joint incident action planning. The meeting should be both brief and documented. Prior to the meeting, parties should have an opportunity to review and address the agenda items. Planning meeting participants will use the results of this meeting to guide the operational efforts prior to the first tactics meeting.

When: The UC is formed prior to the first meeting.

Facilitator: UC Member

Agenda:

- Identify UC, based on IMH Chapter 6 criteria.
- Identify jurisdictional priorities and objectives.
- Present jurisdictional limitations, concerns and restrictions.
- Develop a collective set of incident objectives.
- Agree on incident priorities.
- Agree on basic organizational structure.
- Designate the best-qualified and acceptable Operations Section Chief (OPS).
- Agree on General Staff personnel designations and planning, logistical, and financial agreements and procedures.
- Agree on resource ordering procedures.
- Agree on cost-sharing procedures.
- Agree on informational matters.
- Designate a Unified Command Information Officer.

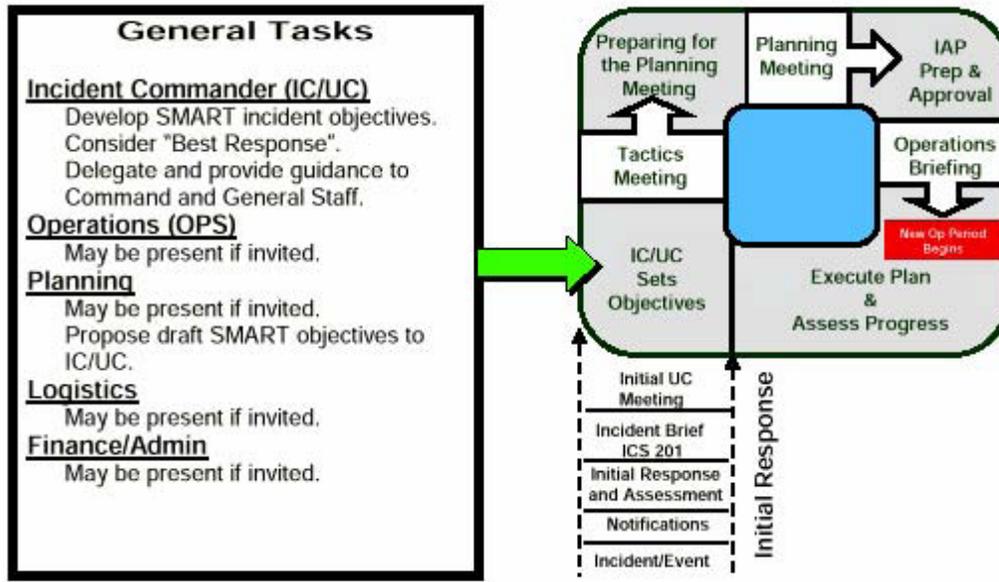
4110.3 Unified Command Objectives Meeting

At this meeting the IC/UC will identify/review and prioritize objectives for the next operational period using the ICS Form 202. Objectives from the previous operational period are reviewed and any new objectives are identified.

When: Before the tactics meeting

Facilitator: UC Member

Attendees: UC Members, Command and General Staff as appropriate.



Agenda:

- Review/identify objectives for the next operational period (clearly stated and attainable with the resources available, yet flexible to allow members to choose best tactics).
- Review any open agenda items from initial/previous meetings.

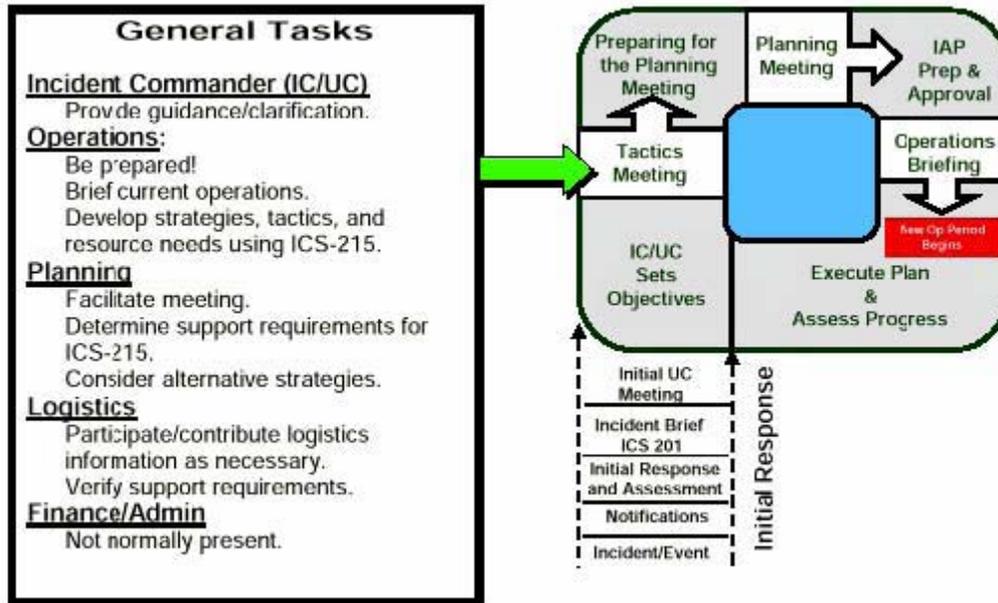
4110.4 Tactics Meeting

This meeting creates the blueprint for tactical deployment during the next operational period. In preparation for the Tactics Meeting, the Planning Section Chief (PSC), and OPS review the first stage of response operations or the current IAP situation status information, as provided by the Situation Unit to assess work progress against IAP objectives. The OPS/PSC will jointly develop primary and alternate strategies to meet objectives for consideration at the next Planning Meeting.

When: Prior to Planning Meeting.

Facilitator: PSC.

Attendees: PSC, OPS, Logistics Section Chief (LSC), and Resources Unit Leader (RUL).



Agenda:

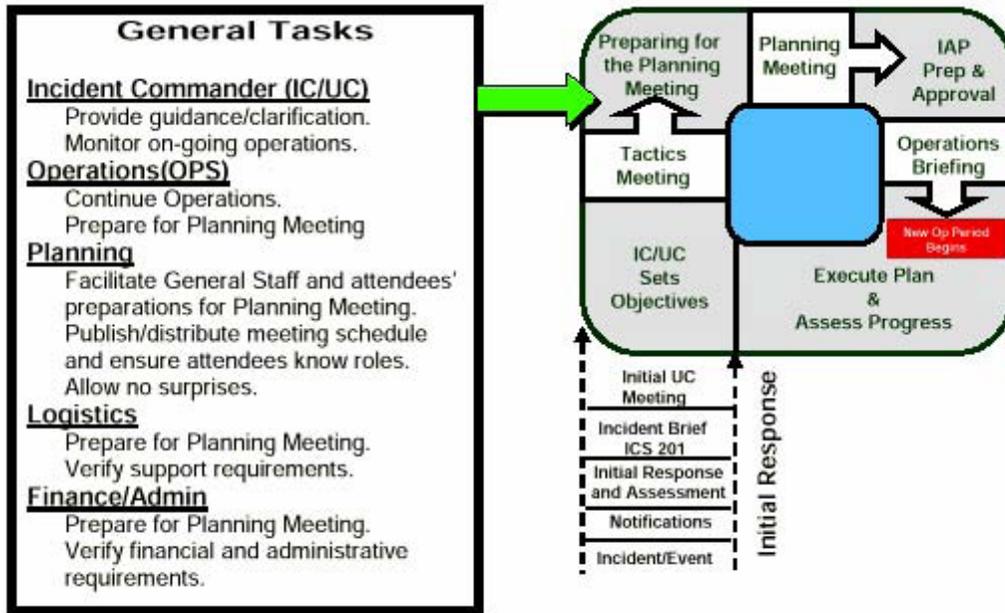
- Review the objectives for the next operational period and develop strategies (primary and alternatives).
- Prepare a draft of ICS Form 215 (used in planning meeting) to identify resources that should be ordered through Logistics.

4110.5 Preparing for the Planning Meeting

During this phase of the Planning Cycle, the Section Chiefs and their associated staff members begin the work of preparing for the upcoming Planning Meeting. Each Section Chief is responsible for ensuring that his/her Planning Meeting responsibilities are met. The PSC should facilitate this to the greatest extent possible to ensure that the material, information, resources, etc., to be used or discussed in the Planning Meeting are organized and prepared. There are to be no surprises in the Planning Meeting.

When: After the Tactics Meetings

Facilitator: PSC



4110.6 Planning Meeting

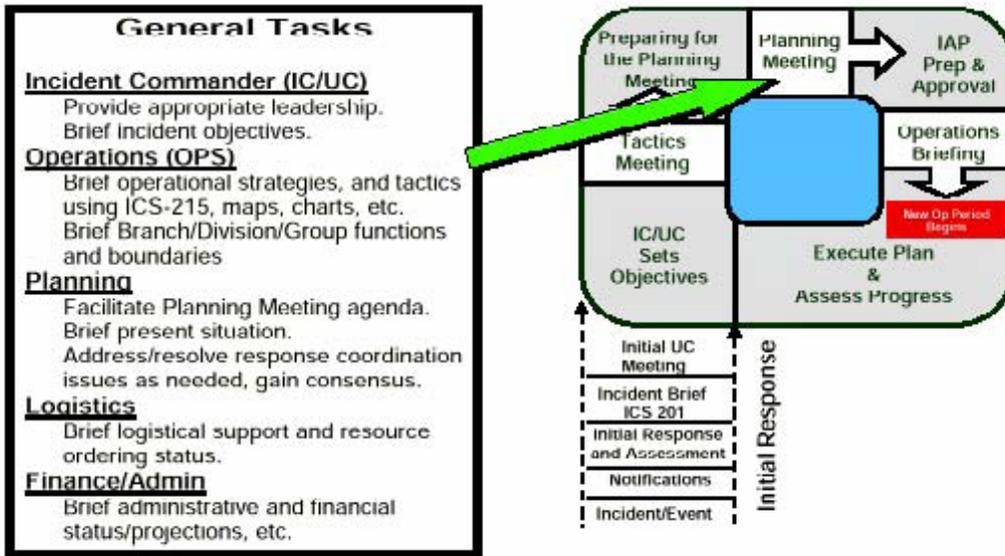
This meeting defines incident strategies and tactics and identifies resource needs for the next operational period to achieve the U/C objectives. Depending on incident complexity, this meeting should last no longer than 30-45 minutes. This meeting refines objectives and priorities, identifies and solves problems, and defines work assignments and responsibilities on a completed ICS Form 215 (Operations Planning Worksheet).

Displays in the meeting room should include Objectives ICS Form 202 for the next period, large sketch maps or charts (clearly dated and timed), a poster-sized ICS Form 215, a current resource inventory prepared by the Resource Unit, and current situation status displays prepared by the Situation Unit. After the meeting, ICS Form 215 is used by the LSC to prepare the tactical and logistical resource orders, and used by the PSC to develop IAP assignment lists.

When: After the UC and Tactics Meetings

Facilitator: PSC

Attendees: IC/UC, Command Staff, General Staff, Air Operations Branch Director (Air Ops), the RUL, Safety Officer (SO), and Technical Specialists, as required.



AGENDA:

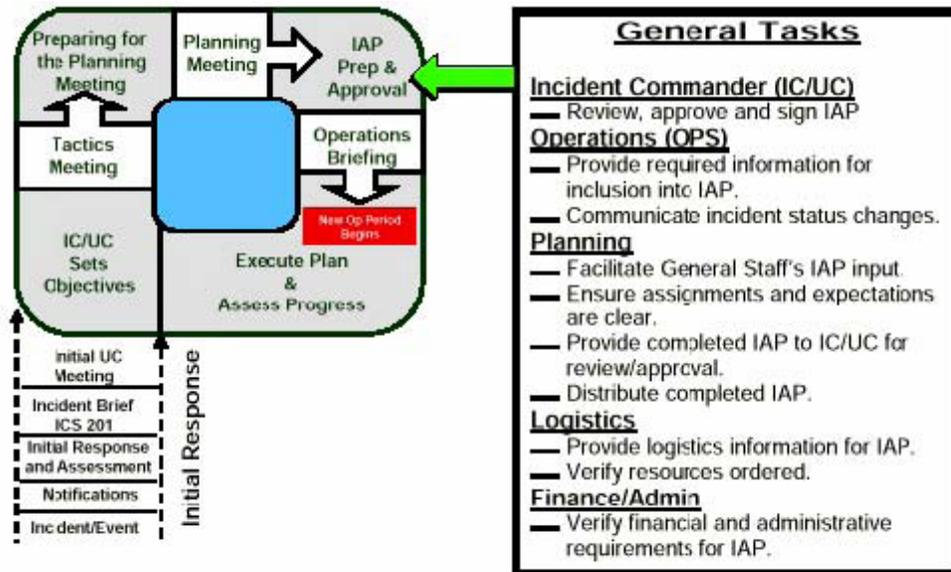
- | | |
|---|---|
| <ol style="list-style-type: none"> 1. State incident objectives and policy issues. 2. Briefing of situation, critical and sensitive areas, weather/sea forecast, and resource status/availability. 3. State primary and alternative strategies to meet objectives. 4. Designate Branch, Division, and Group boundaries and functions as appropriate, use maps and ICS form 215. 5. Specify tactics for each Division, note limitations. 6 Specify resources needed by Divisions/Groups. 7. Specify operations facilities and reporting locations on the Situation map. 8. Develop resources, support, and overhead order (orders). 9. Discuss support issues: communications, traffic, safety, medical, etc. 10. Contributing organization/agency considerations regarding work plan. 11. Safety considerations regarding work plan. 12. Media considerations regarding work plan. 13. Report on expenditures and claims. 14. Finalize and approve work plan for the next operational period. | <p>Primary Responsibility</p> <p>IC/UC</p> <p>SUL</p> <p>OPS</p> <p>OPS</p> <p>OPS</p> <p>OPS</p> <p>OPS/LSC</p> <p>LSC</p> <p>LSC</p> <p>LO</p> <p>SO</p> <p>IO</p> <p>F/ASC</p> <p>IC/UC</p> |
|---|---|

4110.7 Incident Action Plan (IAP) Preparation

Attendees immediately prepare their assignments for the IAP. The deadline will be early enough to permit timely IC/UC approval and duplication of sufficient copies for the Operations Briefing and for overhead.

When: Immediately following the Planning Meeting, the PSC assigns the deadline.

Facilitator: PSC



Common Components

1. Incident Objectives (ICS form 202).
2. Organization List/Chart (ICS forms 203/207).
3. Assignment List (ICS form 204).
4. Communication Plan (ICS form 205).
5. Medical Plan (ICS form 206).
6. Incident Map.
7. Safety Plan.
8. Decontamination Plan.
9. Waste Management or Disposal Plan.

Primary

Responsibility

Resources Unit
 Resources Unit
 Resources Unit
 Communications Unit
 Medical Unit
 Situation Unit
 Safety Officer
 Technical Specialist
 Technical Specialist

Optional Components (use as pertinent):

1. Air Operations Summary (ICS form 220).
2. Traffic Plan.
3. Demobilization Plan.

Air Operations
 Branch Director
 Ground Support Unit

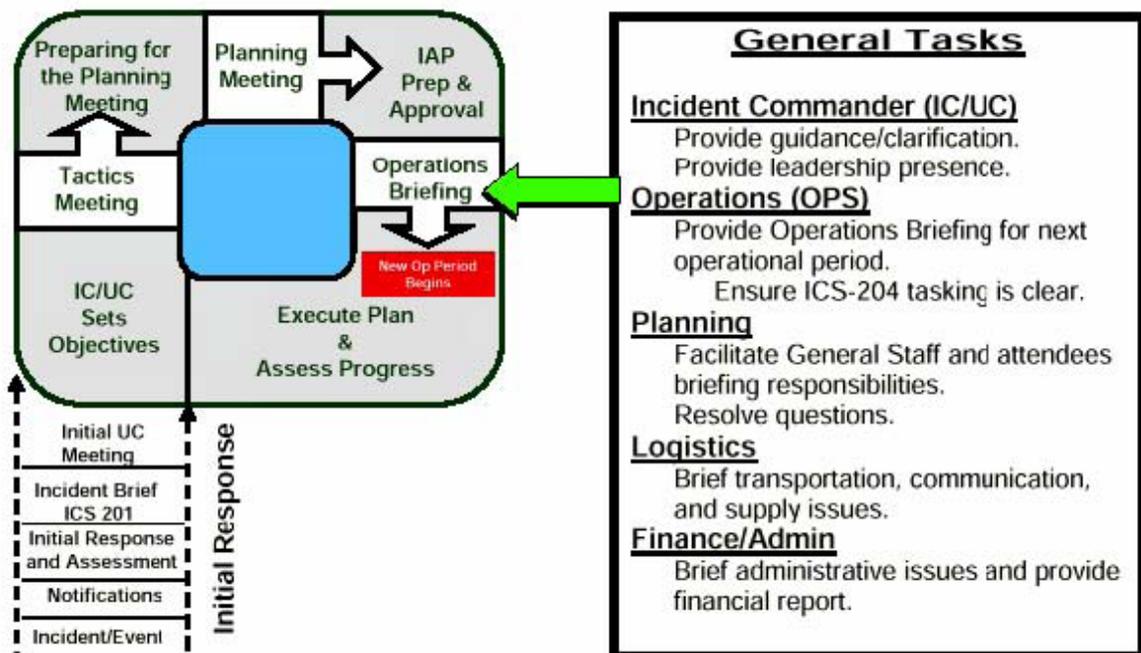
4110.8 Operations Briefing

During this meeting the IAP is presented to the oncoming response organization shift prior to the start of the next op-period. After this meeting, off-going supervisors should be interviewed by their relief and by OPS in order to further confirm or adjust the oncoming shift's IAP. The cognizant Division/Group supervisor may make shifts in tactics. Similarly, a supervisor may reallocate resources within that division to adapt to changing conditions.

When: About an hour prior to each shift change

Facilitator: PSC

Attendees: IC/UC, Command Staff, General Staff, Branch Directors, Division/Group



Agenda

1. Review IC/UC objectives and changes to IAP.
2. Discuss current response actions and last shift's accomplishments.
3. Review weather and sea conditions forecast.
4. Division/Group and Air Operations assignment.

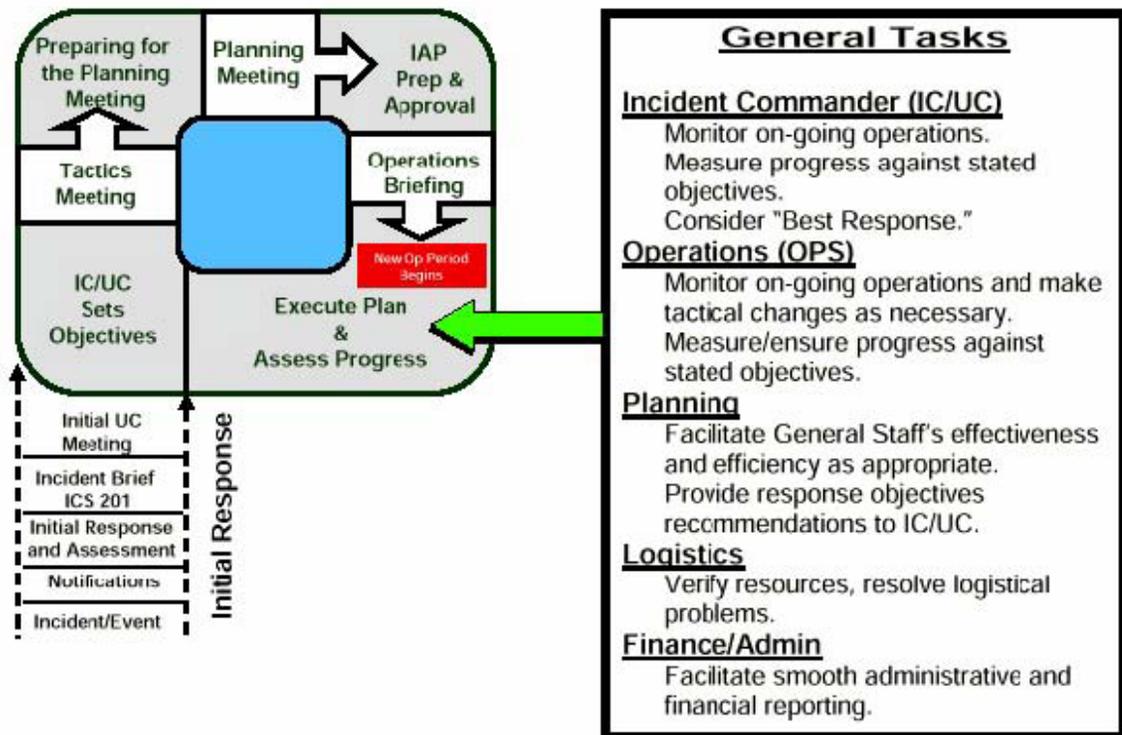
Primary Responsible

PSC
OPS
SUL
OPS

- | | |
|--|-------|
| 5. Trajectory analysis. | SUL |
| 6. Transport, communications, and supply updates. | LSC |
| 7. Safety message. | SO |
| 8. Incident Action Plan (IAP) approval and motivational remarks. | IC/UC |

4110.9 Assessing Progress and Debriefing

The off-going supervisors will be debriefed regarding successes and challenges of the onsite work tasks. Throughout the next operational period, all Section Chiefs will review and assess the response progress and make recommendations to the IC/UC in preparation for the next UC Objectives Meeting. This feedback/information is gathered from various sources, including Field Observers, responder debriefs, stakeholders, etc.



4110.10 Special Purpose Meetings

Special Purpose meetings are most applicable to larger incidents requiring an Operational Period Planning Cycle, but may be useful during Initial Response and Assessment.

Examples include:

- Press briefings

- Alternative Strategy Proposals from technical specialists
- High level briefings to Governor, Congressionals, DHS, etc.

4110.11 Command Staff Meeting

This meeting coordinates Command Staff functions, responsibilities, and objectives. It is held before the Tactics Meeting. Command Staff (IC/UC, SO, LO, IO) attend.

4110.12 Command and General Staff Meeting

This meeting is an opportunity for the Command & General staffs to gather under informal conditions to discuss developing issues.

4120 Planning Section Objectives

4121 First Operational Period (0-4 Hours)

- Evaluate extent of the incident.
- Initiate incident logs.
- Begin Section stand-up.

4122 Second Operational Period (4-24 Hours)

- Identify and prioritize effected or potentially affected environmentally, archaeologically, and economically sensitive areas. Communicate this information to the Operations Section and Unified Command (UC) to ensure initial efforts minimize or avoid impact to such areas.
- Designate Situation Unit to implement and maintain an incident tracking system.
- Continue evaluating the extent of the incident.
- Forecast probable spill impacts.
- Develop strategic plans for response activities during the 24-48 hour operational period and beyond.

4123 Third Operational Period (24-48 Hours)

- Continue to identify and prioritize sensitive areas.
- Continue tracking incident progress in cooperation with the Operations Section.
- Forecast probable spill impacts.
- Develop strategic plans for response activities for the next few days of the operational period.

4200 Situation Unit

The Situation Unit is responsible for the collection and evaluation of spill information, displaying that info, and forecasting the incident evolution. This responsibility includes the compilation of information regarding the type and amount of oil spilled, the amount of oil recovered, the oil's current location and anticipated trajectory, and the impacts on natural resources.

4210 Situational Display (Charts / Maps of the Area)

Various methods may be established for displaying situational information to the UC. The method of choice will depend on availability of resources, the kind of system used (i.e. GIS / MISLE - see section 4240 below), and the command post physical layout.

NOAA's National Ocean Service: Environmental Sensitivity Index (ESI) Maps serve as quick references for oil and chemical spill responders and coastal zone managers.

They contain three kinds of information:

- (1) **Shorelines** are ranked based on their physical and biological character, then colorcoded to indicate their sensitivity to oiling;
- (2) Sensitive **biological resources**, such as seabird colonies and marine mammal hauling grounds, are depicted by shaded polygons and symbol icons to convey their location and extent on the maps;
- (3) ESI maps also show sensitive **human-use resources**, such as water intakes, marinas, and swimming beaches

The maps and charts used in displaying incident information must be appropriate for the incident you are facing. The maps / charts must help responders to do their job and the more detailed the displays are for the area of operation the better.

4220 Weather / Tide / Currents

NOAA's **National Weather Service** is the primary source of weather data, forecasts and warnings for the United States. Television weathercasters and private meteorology companies prepare their forecasts using this information. The NWS is the official voice for issuing warnings during life-threatening weather situations.

Interactive Weather Information Network (IWIN) National Warnings Area provides immediate access to all available warnings for the United States, including the latest information on tornadoes, hurricanes, severe thunderstorms, flash floods, flood, winter storms, special marine weather events and more.

National Data Buoy Center (NDBC) is an agency within the National Weather Service (NWS) of the National Oceanic and Atmospheric Administration (NOAA). It provides high quality meteorological/environmental data in real time from automated

observing systems that include buoys and a Coastal-Marine Automated Network (CMAN) in the open-ocean and coastal zone surrounding the United States.

4230 Situation Unit Displays

Establish a visual story of what is happening on the incident. The story should include at a minimum:

- The current incident objectives
- Summary of the status of the incident. This includes information on the incident itself (e.g. number of injured) and information on response resources (e.g. number of vessels)
- The current situation (e.g. incident boundaries, weather, tides, currents)
- Predictions and potential impacts of what could happen if weather does not cooperate and mitigation strategies
- Schedule meeting times and location

Guiding principles to keep in mind when establishing and maintaining displays:

- Strive for high quality presentation
- Ensure accuracy of situational information
- Maintain current information
- Prominently display a map/ chart legend (important to standardize what the symbols mean)
- Establish a method to capture map / chart information for historical purposes
- Date and time-stamp the map / chart to reflect most recent updates

4230.1 Geospatial Information System

The GIS Specialist should be included into any response organization for compiling updated spill information and providing various map products to the incident command.

4230.2 Marine Information for Safety and Law Enforcement (MISLE) System

The MISLE system features an integrated crisis management system designed to provide real time (or near-time) response and planning information to a UC. It includes electronic forms using a Microsoft Access relational database, a Geographic Information System (GIS) situation display, and a web-based intranet system for disseminating information.

4230.3 Homeland Security Information Network (HSIN)

The Homeland Security Information Network (HSIN) is a national secure and trusted web-based portal for information sharing and collaboration between federal, state, local,

tribal, territorial, private sector, and international partners engaged in the homeland security mission.

HSIN is made up of a growing network of communities, called Communities of Interest (COI). COIs are organized by state organizations, federal organizations, or mission areas such as emergency management, law enforcement, critical sectors, and intelligence. Users can securely share within their communities or reach out to other communities as needed. HSIN provides secure, real-time collaboration tools, including a virtual meeting space, instant messaging and document sharing. HSIN allows partners to work together instantly, regardless of their location, to communicate, collaborate, and coordinate.

HSIN offers many dynamic capabilities including:

- 24/7 availability
- Document Libraries
- Instant-messaging tool
- Web conferencing
- Incident reporting
- Common Operational Picture (COP) provides situational awareness and analysis
- Integrated Common Analytical Viewer (iCAV) gives geographical visualization
- Announcements
- Discussion Boards
- Task Lists
- Requests For Information/For Your Information (RFIs/FYIs)
- Calendars
- Really Simple Syndication (RSS) Feeds
- Online training materials

You may obtain an application by sending a request to HSIN.Outreach@hq.dhs.gov. Once nominated, the COI Validating Authority will review your membership application and approve or deny your admission to the COI. If the application is approved, an email will be sent to you with instructions on how to log onto HSIN for the first time.

4240 Display Processors

Responsible for the display of incident status obtained from Field Observers, resource status reports, aerial and other photographs and infrared data.

4250 Field Observers

Field Observers are responsible for collecting situation information from personal observations at the incident.

4260 Trajectory Analysis Specialists

Trajectory Analysis Specialists are responsible for providing projections and estimates of the movement and behavior of the spill. The specialist will combine visual observations,

remote sensing information, computer modeling as well as observed and predicted tidal, current and weather data to form this analysis.

4270 Resources at Risk (RAR) Specialists

RAR specialists are responsible for the identification of resources thought to be at risk from exposure to spilled oil through the analysis of known and anticipated oil movement and the location of natural, cultural and economic resources. Refer to applicable ESIs for information necessary for this Unit.

4280 Required Operational Reports

Throughout the course of the response cycle numerous operational reports will be developed for formal dissemination of information and archival reasons. Some reports are required by regulation; others are required by the U/C or specific agency. These reports include:

- Situation / Pollution Reports (SITREPs / POLREPs) (USCG/EPA)
- ICS Form 209
- Executive Summaries (State/Federal Agency)

4290 Request For Information Unit

Information management entails tracking resources and responding to Requests for Information (RFIs) using near real-time reports created from the authoritative repositories that contain actual data entered about plans, activities, and outcomes by the field-level response organization.

As highlighted during the Deepwater Horizon response, the volume, type, and frequency of data requested can overwhelm the Situation Unit at every level. The internal and external demand for immediate spill response information can cause a departure for ICS information protocols. Different components of the ICS structure may be queried about most current information regarding their area of responsibility causing inconsistent response status reporting. Depending on who is asked, when the question is asked, and which component of the command structure prepared the response, different reports of what appears to be similar types of data can be generated. That information can then be segregated by the requestor for further distribution without prior vetting resulting in perceptions that the response organization does not know what is going on.

To resolve this issue and provide accurate and timely information, a dedicated Request For Information Unit (RFIU) should be established within the Situation Unit. This RFIU should be staffed by senior CG/agency officials and become the central conduit for information management. As the scope of the situation/response escalates, consultants should be brought in, including contract support and a team from CG Headquarters.

4300 Resources Unit

The Resources Unit is responsible for the status of all resources (primary and support) at an incident. This is achieved through the development and maintenance of a master list of all resources used during the event.

4310 Resource Management Procedures

This section outlines the responsibilities for members of the resources unit in managing response resources for the Planning Section.

4310.1 Check-In Recorder and Procedures

Resource Check-in recorders are responsible for ensuring all assigned resources are accounted for at an incident.

During the early stages of a response when large numbers of resources are arriving check-in locations are usually established in many different locations to handle the influx of resources. Check –in may be found at any of the following locations:

- Incident Command Post
- Staging Areas
- Base or Camps
- Helibases

Check-in recorders are needed at each check-in location to ensure that each resource assigned to a unit is accounted for. The ICS Form 211 (Check–in List) will be used to record the necessary check-in information. All check-in information will be forwarded to the Resources Unit.

4400 Documentation Unit

All users of the OSLTF must maintain detailed records for all resources and costs incurred in responding to a spill incident. Documentation will identify the impact on the waters of the U.S., the source and circumstances of the incident, the responsible party or parties, and impacts and potential impacts to public health and welfare and the environment. Failure to submit timely and complete documentation can result in delays in reimbursement for removal costs and payments to contractors. When appropriate, documentation also will be collected for scientific understanding of the environment and for research and development of improved response methods and technology. The OCS

will make the documentation available to natural resource trustees to help them determine the actual or potential natural resource injuries.

It is the Documentation Unit Leader's (DUL) responsibility to put into place a systematic process to collecting critical incident information, organizing, and maintaining custody of materials during and following the incident response. Guidance for performing tasks can be found in the ICS Documentation Unit Leader Job Aid at the Online Documents page of the National Strike Force Coordination Center: National Strike Force

Responsibilities of the Documentation Unit Leader (DUL) include:

- Provide incident documentation.
- Implement a system to ensure that critical documents pertaining to the response are sent to the Documentation Unit.
- Assess the effectiveness of the Documentation Unit's ongoing activities and modify the system, as necessary to ensure proper documentation.
- Provide duplication services for the command team.
- Establish a comprehensive filing system.
- Ensure that any discrepancies and/or missing documents are recorded.
- Ensure that any documentation that is submitted to the Documentation Unit is accurate and complete.
- Establish a comprehensive archive of files for the response.
- Store files for post-incident use.
- Document Unit activities on the ICS-214CG, Unit Log.

4410 Services Provided

- Collect, file, and segregate all activity records for future archival reference. Relay any challenges and difficulties to the Planning Section Chief.
- Reproduce copies of originals in response to official requests approved by Planning Section Chief.
- Collect copies of supplementary plans from support agencies involved
- Provide research support to Liaison Officer and Information Officer.

4420 Administrative File Organization

Establishing an administrative filing system depends on the complexity of the incident, as well as the potential for future litigation. Typically, the person assigned to the Documentation Unit Leader position will be experienced in the management of such a task. Assistants should review the Job Aid found on <http://homeport.uscg.mil/ics>.

4500 Demobilization Unit

The Demobilization unit is responsible for developing the Incident Demobilization Plan and assisting sections and units to ensure an orderly, safe and cost effective demobilization of personnel and equipment is accomplished from the incident.

The Demobilization Unit Leader (DMOB) must have a maintain close liaison with the Resource Unit Leader (RESL) who maintains the latest information on resources that are currently on the incident and those that will be required for future operational periods. This relationship is critical and focused to make sure that all resources (personnel, and major items of response and support equipment) are released in a methodical way that maintains the integrity of resource accountability and does not impact the continuing response efforts.

Responsibilities of the Demobilization Unit Leader include:

- Establishing a Demobilization Plan
- Coordinating and supporting the implementation of the Demobilization Plan
- Preparing Demobilization Check-out forms, ICS 221-CG for each resource being released
- Keep the Planning Section Chief apprised of the demobilization progress
- As requested by the Planning Section Chief (PSC), attend planning meetings and briefs to provide information on the Demobilization Plan
- Document Unit activities on the ICS 214-CG Unit Log See Section 9331 Template Demobilization Plan for initial development of demobilization plan.

4600 Environmental Unit

The Environmental Unit is responsible for environmental matters associated with response including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The Environmental Unit also prepares environmental data for the situation unit.

Reference: <http://ocean.floridamarine.org/acp/MOBACP/StartHere.html> for Environmental Sensitivity Indexes (ESI) and Geographic Response Plans (GRP).

4610 Human Health

This section outlines human health resources and sensitivity issues for the shorelines and coastal areas of Southeastern Florida.

4611 Shoreline/Coastal Residential Population Densities

This Section is under development by the SECMOB Contingency Planning Department.

4612 Drinking Water Intakes

This Section is under development by the SECMOB Contingency Planning Department.

4700 Technical Support / Specialists

Technical specialists are advisors within the Planning Section with special skills needed to support an incident. Technical specialists may be assigned anywhere in the ICS structure, however, and often advise the FOSC/SOSC/RPIC directly on certain issues

4710 Scientific Support Coordinator (SCC)

Normally, the NOAA Scientific Support Coordinator (SSC) should be included in any response if only as notification to ensure all response issues are addressed. The SSC will be located within the Environmental Unit if not assigned as Unit Leader.

The **National Oceanic and Atmospheric Administration (NOAA)** provides SSCs in coastal and marine areas. The SSC provides scientific support for response and contingency planning in coastal and marine areas. The SSC assists in:

- assessing the hazards that may be involved;
- build a diverse support team to provide expertise in environmental chemistry, oil slick tracking, pollutant transport modeling, environmental tradeoffs of countermeasures and cleanup, information management, contingency planning;
- provides information on the sensitivity of coastal environments to oil and hazardous substances, natural resources at risk, and associated cleanup and mitigation methods;
- provides expertise on living marine resources and their habitats, including endangered species, marine mammals and National Marine Sanctuary ecosystems;
- provides information on actual and predicted meteorological, hydrological, ice, and oceanographic conditions for marine, coastal, and inland waters, and tide and circulation data for coastal and territorial waters;

NOAA's Office of Response and Restoration's Emergency Response Division (ERD), consists of a multi-disciplinary scientific team that includes oceanographers, modelers, biologists, chemists, and geologists to respond to oil and chemical spills in U.S. waters and helps the FOSC to make timely operational decisions. The team is headquartered at NOAA's campus in Seattle; however SSCs lead the team at spills, drawing on the team's spill trajectory estimates, chemical hazards analyses, and assessments of the sensitivity of biological and human-use resources. In addition, ERD natural resource scientists assess the extent of environmental injury and assist the Assessment and Restoration Division with initiation of natural resource damage assessment (NRDA).

FOSC's Guide to NOAA Scientific Support (February 2007)

See Section 9210.3 for a comprehensive list of NOAA contacts.

4720 Hazardous Materials

4720.1 Toxicologist and Local Scientists

The Chaffey Amendments to the Oil Pollution Act of 1990 mandates that the Area Committee compile a list of local scientists, both inside and outside Federal Government Service, with expertise in the effects of spills of the types of oil typically transported in the area, who may be contacted to provide information or, where appropriate, participate in meetings of the scientific support team convened in response to a spill.

See Section 9210.6 for a list of toxicologist contacts.

4720.2 Product Specialist

Trained professional that is knowledgeable about the specific hazardous substance product that is released, and in particular the chemical changes that may occur when it is released into the environment.

4720.3 Certified Marine Chemist

The Marine Chemist Association is an independent professional organization composed of chemists certified by the National Fire Protection Association in accordance with published rules. The Association originated in May 1938, as the Marine Chemists' Subsection of the NFPA, Marine Section. Upon termination of the Marine Section in 1948, the present Association was organized for the following purposes:

- To promote the science of, and improve the method of evaluation and eliminating health, fire, and explosion hazards in marine and associated industries.
- To obtain and circulate information relative to these hazards and other information regarding the professional and ethical activities of its members.
- To enhance the general welfare of its members by promoting a closer relationship with all concerned industry and regulatory bodies.

The United States Coast Guard and the Occupational Safety and Health Administration require that a certificate issued by a Marine Chemist must be obtained before hot work or fire producing operations can be carried out in certain spaces aboard a marine vessel. The appropriate U.S. Coast Guard Regulations are contained in 46 CFR 35.01-1(c)(1), 71.60-1(c)(1), 91.50-1(c)(1), 167.30-10(c)(1), and 189.50-1(c)(1). The appropriate OSHA regulations are contained in 29 CFR 1915.14.

In complying with both the U.S. Coast Guard and OSHA regulations, the Marine Chemist applies the requirements contained in National Fire Protection Association Standard 306. NFPA 306, Control of Gas Hazards on Vessels, describes conditions that must exist aboard a marine vessel. A survey by the Marine Chemist ensures that these conditions are satisfied.

In addition, a Marine Chemist is able to perform similar evaluations on other than marine vessels where an unsafe environment exists for workers, or hot work is contemplated on a system that might contain residues of a flammable or combustible product or materials.

Web Site: <http://marinechemist.org/>

4720.4 Certified Industrial Hygienist

An Industrial Hygienist (IH) is a professional who is dedicated to the health and well being of the worker. Typically, this would have an IH evaluating the health effects of chemicals or noise in a work place. The IH professional traditionally has gained knowledge through a combination of education, training, and experience. Ideally, this knowledge is used to anticipate when a hazardous condition could occur to cause an adverse health effect on workers or the environment. Failing that, the IH must be able to recognize conditions that could lead to adverse health effects to workers or a community population.

See Section 9240.8 for contact information.

4720.5 Chemist or Chemical Engineer

Trained and licensed professional that is knowledgeable in the development and application of manufacturing processes in which materials undergo changes in properties and that deals especially with the design and operation of plants and equipment to perform such work.

See Sections 9240.8 Maritime Associations or 9240.10 Laboratories for further information.

4720.6 Sampling

The SSC is responsible for providing a sampling plan for the coordinated collection, documentation, storage, transportation and submittal to appropriate laboratories for analysis or storage.

See Section 9240.8 Laboratories for contact information.

4730 Oil

4730.1 Shoreline Cleanup Assessment

When spilled oil contaminates shoreline habitats, responders must survey the affected areas to determine the appropriate response. Although general approvals or decision tools for using shoreline cleanup methods can be developed during planning stages, responders' specific cleanup recommendations must integrate field data on shoreline habitats, type and degree of shoreline contamination, and spill specific physical processes. Cleanup endpoints must be established early so that appropriate cleanup methods can be selected to meet the cleanup objectives. Shoreline surveys must be conducted systematically because they are crucial components of effective decisions.

Also, repeated surveys are needed to monitor the effectiveness and effects of ongoing treatment methods (changes in shoreline oiling conditions, as well as natural recovery), so that the need for changes in methodology, additional treatment, or constraints can be evaluated.

Target cleanup endpoints are an integral part of spill-specific cleanup guidelines used for emergency oil-spill response. Endpoints are selected based on cleanup objectives to:

- (1) Minimize exposure hazards to human health;
- (2) Speed recovery of impacted areas; and
- (3) Reduce the threat of additional or prolonged natural resource impacts.

These objectives lead to developing cleanup strategies that do not cause more harm to the environment than good.

Ideally, cleanup efforts will return the resource to its baseline condition without suffering further impact or affecting resources not initially impacted by the spill. Aggressive and inappropriate cleanup techniques can make matters worse. Less intrusive methods or natural recovery are often preferable. The best cleanup strategy is often not the one that removes the most oil. Rather, it is the strategy that removes oil that poses a greater risk of injury than would result from cleanup, and allows remaining oil to be removed by natural processes.

Although the highest cleanup endpoint is removal of all visible oil, this is often impossible, particularly if there is a background rate of oil deposition (e.g. natural oil seeps or shipping traffic). In these cases, a more appropriate endpoint would be cleanup of visible oil, but not exceeding the background amount. When shoreline cleanup to achieve these endpoints is likely to cause added harm to the environment, three additional endpoints may be considered:

- (1) Oil removal to the point where the shoreline no longer generates sheens that affect sensitive areas, wildlife, or human health;
- (2) Oil removal to the point where it no longer rubs off; and (3) Oil removal to the point that allows recovery/recolonization without causing more harm than leaving the oil in place.

Note that "visible" oil applies not only to oil on the surface, but also to buried oil that must be exposed by digging trenches into the sediments.

The NOAA Shoreline Assessment Manual outlines methods and provides visual aids for conducting shoreline assessments and incorporating the results into the decision-making process for shoreline assessments and cleanup at oil spills.
(<http://archive.orr.noaa.gov/oilaidspdfs/SAM.pdf>)

4730.2 Natural Resource Damage Assessment

A major goal of the Oil Pollution Act of 1990 (OPA)¹ is to make the environment and public whole for injury to or loss of natural resources and services as a result of a discharge or substantial threat of a discharge of oil (referred to as an “incident”). This goal is achieved through returning injured natural resources and services to the condition they would have been in if the incident had not occurred (otherwise referred to as “baseline” conditions)

The purpose of the **Pre-assessment Phase, August 1996** Guidance Document is to provide trustees with general guidance for early assessment activities required under the Pre-assessment Phase of the OPA regulations. The Pre-assessment Phase is a preliminary fact-finding exercise that provides the information necessary to determine whether to pursue restoration planning.

This document was prepared primarily to provide guidance to natural resource trustees using the OPA regulations.

The purpose of the **Injury Assessment, August 1996** Guidance Document is to provide general approaches for identifying and evaluating injuries to natural resources resulting from incidents involving oil. The focus of this document is on natural resources. This document was prepared primarily to provide guidance to natural resource trustees using the OPA regulations.

See Sections 9210.3 Scientific Support Coordinator for NRDA support contacts.

4731 Alternative Response Technologies

During an oil or chemical spill, the On-Scene Coordinator (OSC), who directs the response, may be asked to consider using a non-conventional alternative countermeasure (a method, device, or product that hasn't typically been used for spill response). To assess whether a proposed countermeasure could be a useful response tool, it's necessary to quickly collect and evaluate the available information about it.

To aid in evaluating non-conventional alternative countermeasures in particular, the **Alternative Response Tool Evaluation System (ARTES)** was developed. ARTES can also be used to evaluate proposed conventional countermeasures. It is designed to evaluate potential response tools on their technical merits, rather than on economic factors.

The ARTES may be used both before and during an incident. If an FOSC would like to consider using an alternative response tool for pre-spill planning, the ARTES may help evaluate the tool. ARTES uses an Alternative Response Tool Team (ARTT) to rapidly evaluate a tool and provide feedback to the FOSC in the form of a recommendation. This enables the FOSC to make a well-informed decision on the use of an alternative tool. One of the advantages of ARTES is that it provides a management system for addressing the numerous proposals submitted by vendors during a spill. Needs of a spill change as the response progresses. ARTES requires evaluations only on an as-needed basis. That is, once an operational need is identified, then an evaluation can be initiated. Having a record of proposals on file will enable the FOSC to address alternatives for any future needs. Subjecting all proposals to the same degree of evaluation ensures that vendors are considered on a “level playing field.”

Refer to the following:

Alternative Response Tool Evaluation System (ARTES)

<http://response.restoration.noaa.gov/oil-and-chemical-spills/oilspills/resources/alternative-response-tool-evaluation-system-artes.html>

4732 Specialized Monitoring of Applied Response Technologies (SMART)

Special Monitoring of Applied Response Technologies (SMART)

The SSC is also responsible for evaluating the opportunities to use dispersants, other chemical countermeasures, in-situ burning and bioremediation. This includes a consultation and planning required to deploy and articulate environmental trade offs.

Also refer to Region IV (4) website:

(http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm) for notifications and guidance

4733 Decontamination

See Section 3260 Decontamination Group.

4734 Disposal (Waste Management) Specialists

Responsible for providing a disposal plan that details the collection, sampling, monitoring, temporary storage, transportation, recycling and disposal of all anticipated response wastes. In dealing with oil spills, one of the main problems encountered is what to do with the waste materials, once the cleanup has begun. When dealing with the

method of disposal, there are three main areas of concern: ecology, logistics, and finance. What further effects or risks are going to occur due to relocation of the waste material?

Ideally, the goal is to dispose of the material without any further hazard generated or further impacts to the environment, including air, surface water, ground water, and soils. How can waste be safely moved from the site to the disposal and /or treatment area? What is the availability of the machinery needed for removal? What is the capacity of the disposal and/or treatment facility? How much is it going to cost to dispose of the waste? What are the possibilities of recycling the wastes into a useful product to help offset the disposal cost? Waste material generally fall into one of the following categories:

- (1) Recovered liquids (oil/water mixtures)
- (2) Contaminated absorbents and debris
- (3) Contaminated soil/sand

Liquid waste is probably the easiest form of waste to deal with because it is easily handled, moved, or sometimes can be processed into a useful product. Absorbents are the most widely used products for oil spill cleanup. Organic absorbents, mainly made of straw, are biodegradable. Many new absorbents are synthetic and their biodegradability is greatly reduced. The best absorbent would be one that could be reused, much like a sponge, leaving only liquid waste, which is easily disposed of, thereby reducing cleanup costs and the amount of solid waste generated.

4734.1 Recovered Liquid Waste

Items/Issues to be addressed, as applicable, in Disposal Plan:

- Disposal in accordance with 40 C.F.R. 262.20-23 for RCRA wastes.
- Recycling (recovery in settling tanks, used oil recyclers).
- High temperature incineration.
- Evaporation of light ends.
- Oxidation.
- Bio-degradation.
- Open burning where permitted.
- Use as fuel.

4734.2 Contaminated Sorbents and Debris

Items/Issues to be addressed, as applicable, in Disposal Plan:

- Disposal in accordance with 40 C.F.R. 262.20-23 for RCRA wastes.
- Incineration at waste-to-energy facilities.
- Soil thermal treatment facilities (special conditions apply).
- Class I permitted municipal waste landfill.

4734.3 Contaminated Soils

Items/Issues to be addressed, as applicable, in Disposal Plan

- Disposal in accordance with 40 C.F.R. 262.20-26 for RCRA wastes.
- Soil thermal treatment facilities.
- Incineration at waste-to-energy facilities.

4734.4 Waste Characterization

The first step in determining which method(s) of disposal will be utilized is to characterize the waste and determine if it is subject to the requirements of the Resource Conservation and Recovery Act (RCRA), 40 C.F.R. The Responsible Party's (RP) knowledge of the material and/or laboratory analysis, and the intended use of the recovered material, must be used to determine if the material meets the criteria for hazardous waste set forth in 40 C.F.R 261.

4734.5 RCRA Regulated Waste

If the material meets the criteria for RCRA regulated wastes, it can only be disposed of at an approved hazardous waste treatment/disposal facility. If the spill is not a hazardous waste listed in 40 C.F.R 261 Subpart D, but exhibits a characteristic of hazardous waste per 40 C.F.R 261 Subpart C, it is possible to treat the waste on-site to render it non-hazardous prior to off-site disposal. The waste generator shall treat hazardous waste in tanks or containers only, provide a waste analysis plan to document treatment, and ensure compliance with 40 C.F.R 262.34 requirements while accumulating and treating the waste. This kind of treatment would include stabilization of soils with cement, neutralization, and other simple forms of non-thermal treatment. Evaporation of organics and dilution are not permissible.

4734.6 Non-RCRA Regulated Wastes

Several options exist for disposal, treatment or recycling of wastes and recovered products that are not subject to RCRA requirements. Following is a brief summary of each option and recommended procedures.

4735 Land Filling

Land filling of soil and debris, which is non-hazardous and non-saturated in a lined Class I landfill in an acceptable disposal option. Decisions regarding acceptance of wastes are at the discretion of the landfill operator. Laboratory analysis of waste may be required prior to acceptance. In some cases, treatment of petroleum-contaminated soil may include “land farming.” This process involves spreading the soil in a thin layer over an impermeable liner or surface. The contaminant reduction is caused by a combination of volatilization, biodegradation, and photo degradation.

4736 Contact Water

Contact water is any water that has come in contact or is contaminated with oil. While the RP is expected to provide sufficient containment, collection, and storage resources, the disposal of excess contact water may become necessary if a lack of storage capacity is available in order to ensure an efficient response. The OSC/UC should consider the disposal of contact water as a last resort. The RRT has guidance and checklists to assist the OSC/UC in deciding upon procedures, standards, and monitoring protocols. RRT approval is not required for the disposal of contact water, but State approval may be required. (See RRT4 Guidance for Disposal of Contact Water at web site:

http://www.nrt.org/production/NRT/RRTHome.nsf/AllPages/rrt_ivrcp.htm?OpenDocument

4737 Dredging

See Section 9230 Local Government Environmental Agencies for local/county contacts regarding inland/coastal dredging.

For offshore/ocean dredging, EPA would be the primary point of contact for permitting and other guidance. See Section 9210.5 EPA Environmental Response Team for contact information.

4738 Deepwater Removal

For offshore/ocean removal, EPA would be the primary point of contact for permitting and other guidance. See Section 9210.5 EPA Environmental Response Team for contact information.

4740 General

The following provides guidance on the various consultation processes and respective agencies. Always liaise with the NOAA Scientific Coordinator to convene formal and informal discussions.

4741 Cultural and Historic Properties

The National Historic Preservation Act requires Federal agencies to take into account the effects of response actions on historic properties when responding to spills. As the Federal official designated to coordinate and direct response actions, the Federal On-Scene Coordinator (FOSC) is responsible for ensuring historic properties are appropriately considered while planning and during a spill response. Historic properties include any prehistoric or historic district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places (36 CFR Part 60). The listing of these sites is not publicly releasable, however detailed maps identifying historic sites may be available from your state Department of Natural Resources, Geographic Information Systems Division as needed. Most historic sites are located on land and are not likely to be impacted by spills of oil or hazardous substances. However, many sites are located near the water, which can be adversely impacted by containment and recovery operations. Heavy equipment is particularly harmful to archeological sites and the FOSC should use other methods of containment and recovery in these areas. Some historic sites are located underwater and may be damaged by an oil or hazardous substance spill. However, even underwater, the sites are more likely to be adversely impacted by containment and recovery operations than the spill itself.

Before conducting containment or recovery operations on a historic site, the FOSC should contact the state Historical Preservation Officer (SHPO) to determine the sensitivity of the site. The SHPO may also be able to assist in identifying which containment and recovery techniques are least likely to impact the historic site.

See Section 9220.5 for Historical Preservation Officer contact information.

The National Register of Historic Places is the Nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The National Register is administered by the National Park Service, which is part of the U.S. Department of the Interior.

National Register of Historic Places (<http://www.nps.gov/history/nr/about.htm>)

4741.1 The National Historic Preservation Act

On October 15th, 1966, Congress passed 16 USC 470, the National Historic Preservation Act (NHPA), to preserve the historical and cultural foundations of our Nation. Under Section 106 of NHPA, Federal agencies are required to consider the effects of their actions on historic properties and take steps to reduce or eliminate adverse effects.

See National Historic Preservation Act 1966 (Amended 2000)

(<http://www.achp.gov/NHPA.pdf>)

For the purpose of this plan, the FOSC, as the Federal official designated to coordinated direct response actions, is responsible for ensuring that historic properties are appropriately considered in planning and during emergency response.

Section 106 regulations 36 CFR Part 800 Protection of Historic Properties (Amendments effective August 2004).

The Advisory Council on Historic Places published a brochure Using Section 106 to Protect Properties (<http://www.achp.gov/using106.pdf>)

4741.2 How the PA Applies to the USCG FOSC

The Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan

(PA) requires consideration of historic properties in planning for and conduct of emergency response under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The PA was developed to help Federal agencies sufficiently comply with the requirements of the statute. This document is intended to assist Federal On-Scene Coordinators (FOSCs) in areas where the pre-spill planning called for in the PA has not yet been completed. However, it should not be used to replace existing regional PAs developed pursuant to the national PA or existing Area Contingency Plan (ACP) provisions developed pursuant to a regional or the national PA. It should also not be used as a substitute for completing the pre-spill planning called for in the PA.

The PA, signed by the Assistant Commandant for Marine Safety, Security and Environmental Protection on May 13, 1997, provides an alternative to the process in Section 106 of the NHPA to ensure appropriate consideration of historic properties within the context of the NHPA during emergency response to a discharge or a release under the NCP (40 CFR 300). The alternative to following the process in the PA, including the pre-spill planning part of the process, is to follow the complete consultation process in Section 106 of the NHPA.

The PA states that the FOSC is responsible for ensuring that historic properties are appropriately considered in planning and during emergency response. During pre-spill planning activities, the PA calls for identifying:

- historic properties listed in, or determined to be eligible for listing in, the National Register of Historic Properties (NR) that might be affected by response to a release or spill;
- unsurveyed areas where there is a high potential for the presence of historic properties; geographic areas or types of areas where historic properties are unlikely to be affected; □ parties that are to be notified in the event of a spill in a non-excluded area; who will be responsible for providing expertise on historic properties to the FOSCs during emergency response (i.e., the FOSC's Historic Properties Specialist (see Section 9225 FL Historical Preservation Officer)); and
- developing emergency response strategies to help protect historic properties. Effective consideration of historic properties during emergency response in the absence of this advance planning is extremely difficult and may not be possible, so to take advantages of the benefits of the PA, FOSCs are to make every effort to conduct this planning effort and incorporate it into the ACP in advance. During emergency response, FOSCs are responsible for initiating the agreed upon mechanism for addressing historic properties, namely activating the FOSC's Historic Properties Specialist. In turn, the FOSC's Historic Properties Specialist will: notify and consult with parties identified in pre-incident planning and those applicable entities that are listed in the ACP; assess potential effects of emergency response strategies on historic properties; and recommend to the FOSC response actions to help minimize or eliminate potential impacts to historic properties.

4741.3 Obtaining Expertise on Historic Property Matters During Emergency

Response

One of the essential pre-spill planning elements is the identification of those who will be responsible for providing reliable and timely expertise on historic properties to the FOSC during emergency response, i.e., the FOSC's Historic Properties Specialist. The PA provides that historic properties expertise and support may be obtained by the FOSC in any one of several ways:

- Implementing an agreement with State or Federal agencies that have historic properties specialists on staff;
- Executing a contract with experts identified in ACPs; or
- Privately hiring historic properties specialists.

The PA specifies the professional qualifications and standards that an Historic Properties Specialist must meet. It should be noted that only the FOSC, and not the Responsible Party, may contract with experts to serve as the FOSC's Historic Properties Specialist.

An FOSC may utilize a Pollution Removal Funding Authorization (PRFA) for funding the activation of an Historic Property Specialist only during emergency responses to oil

pollution incidents. Oil Spill Liability Trust Fund resources are not available for hiring of a specialist to assist with pre-spill planning activities.

If FOSCs choose to obtain historic properties expertise through executing contracts with appropriate archaeologists, it is possible to go through a solicitation process that includes technical input and assistance from appropriate State Historic Preservation Officers (SHPOs) and Federal land management agency cultural resources specialists. Blanket Purchase Request Agreements may then be established with one or more companies or with one or more named individuals who may be activated during emergency response to serve as the FOSC's Historic Properties Specialist(s).

4741.4 References

In the development of an Incident Action Plan (IAP), refer to this document, its appendixes, and the PA. The PA may be found at: <http://www.achp.gov/NCP-PA.html>.

For an example of implementation guidelines for the national PA, refer to the properties included in the NR may be found at:

<http://www.cr.nps.gov/nhl/designations/listsofNHLs.htm>.

However, the NR is not sufficient in helping to determine all of the properties that need to be considered in your ACP, as you must also consider properties that could be determined eligible for inclusion in the NR.

For eligibility criteria, please refer to: <http://www.cr.nps.gov/nr/listing.htm>.

The following web page contains links to SHPOs, Tribal Preservation Officers, and Federal Preservation Officers: <http://www.cr.nps.gov/nr/listing.htm>.

Information on Indian tribes may be found at:

NATHPO | Home Page

Geographical Index to the Tribes of the United States

Maps of Native American Nations, History, Info

4741.5 Emergency Response Phase Checklist

FOSC determines whether the exclusions of the PA apply. Operate under assumption that any oil discharge or hazardous substance release may impact or has impacted historic properties, unless the release impacts one of the excluded areas.

- Excluded areas may be specific geographic areas or types of areas where, should a release or spill occur, historic properties are unlikely to be affected. This includes the

information listed in Section 4741.7 and any additional exclusions agreed upon by the signatories to a regional PA.

If the incident affects only excluded areas, no further actions are necessary unless:

- Previously unidentified historic properties are discovered during the response; and/or
- The State Historic Preservation Officer or appropriate Federal, Indian, or Native Hawaiian organization notifies the FOSC that a categorically excluded release or spill may have the potential to affect a historic property; and/or
- The FOSC is not sure whether a release or spill fits into one of the categories listed above; and/or .
- At any time, the specifics of a release or spill change so it no longer fits into one of the categories listed above; and/or .
- The spill or release is greater than 100,000 gallons. If the area where a release or spill occurs has not been excluded, then .
- Activate the agreed-upon mechanism for addressing historic properties (i.e., the FOSC's Historic Properties Specialist), who will notify and consult with the parties identified in the ACP through the PA pre-spill planning process) and provide them with incident information (Section 4741.8).

FOSC's Historic Property Specialist assesses potential effects of emergency response strategies on historic properties in consultation with the parties identified in the ACP. The FOSC's Historic Property Specialist recommends to the FOSC response actions and policies developed in consultation with parties identified in the ACP to help minimize potential impacts to historic properties. See Section 4741.9.

Whenever the FOSC determines that the requirements of the PA cannot be satisfied concurrently with the paramount requirement of protecting public health and the environment, the determination shall be documented in writing including the name and title of the person who made the determination, the date of determination, and a brief description of the competing values between public health and safety and carrying on the provisions of the PA (See Section 4741.10). Submit form to State Historic Preservation Officer or appropriate Federal, Indian, or Hawaiian Native organizations and/or public.

4741.6 Procedures for Determining When to Activate an Historic Properties Specialist

STEP 1: Receive notification of oil discharge or hazardous substance release

STEP 2: Determine if Historic Properties need to be considered. Does the spill or release fall into one of the following categories listed in Section 4741.7?

If the answer is “YES,” no other actions regarding historic protection are required. If the answer is “NO” proceed to Step 3.

STEP 3: To continue in accordance with the National Programmatic Agreement, Activate Federal On-Scene Coordinator’s Historic Properties Specialist See Section 4741.8 for suggested information to provide to the Historic Properties Specialist upon activation.

4741.7 Spills and Releases Categorically Excluded From NHPA Compliance

Spills/releases onto (which stay on):

- Gravel pads.
- Roads (gravel or paved, not including the undeveloped right-of-way).
- Parking areas (graded or paved).
- Dock staging areas less than 50 years old.
- Gravel causeways.
- Artificial gravel islands.
- Drilling mats, pads, and/or berms .
- Airport runways (improved gravel strips and/or paved runways)

Spills/releases into (that stay in):

- Lined pits; *e.g.*, drilling mud pits and reserve pits.
- Water bodies where the release/spill:
 - 1) will not reach land or submerged land; and
 - 2) will not include emergency response activities with land or submerged land disturbing components .
- Borrow pits.
- Concrete containment areas

Spills/releases of:

- Vapor (*e.g.*, chlorine gas)

IMPORTANT NOTES TO FOSC:

- (1) If unsure whether a release or spill fits into one of the above categories; and/or
- (2) If at any time the specifics of a release or spill changes so it no longer fits into one of the above categories; and/or
- (3) If the spill or release is greater than 100,000 gallons; and/or
- (4) If the State Historic Preservation Officer (SHPO) and/or another stakeholder notifies you that a categorically excluded release or spill may have the potential to affect an historic property.

Follow the Emergency Response Phase Checklist, or Section IV of the PA.

4741.8 Information to be Provided to the History

Name of Incident: _____
Date/time of incident: _____
Spill/release location: land _____ water _____ land/water _____
If on land, estimate number of acres contaminated _____
Spill/release coordinates: _____ latitude; _____ longitude.
If on land, _____ township; _____ range; _____ section
Distance to nearest water body, if on land: _____ km/mi
Distance to nearest land, if in water: _____ km/mi
Product released: _____
Estimated volume of product released: _____ gals/bbls
Release status: Stopped _____; Continuing _____; Unknown _____
Is spill/release: Contained _____; Spreading _____; Unknown _____
Estimated volume of product potentially released: _____ gals/bbls/other measure
Have Regional Response Strategies been approved for the area affected or potentially affected by the spill/release? Yes _____; No _____
Describe any response actions proposed or taken that include ground-disturbing activities:

4741.9 Potential Emergency Protection Strategies

Response Strategy

Mechanical Recovery (e.g. use of skimmers, booms, sorbents)

In situ Burning

Dispersant Use

Protective or diversionary booming

Covering site with protective material

Construction of berms or trenches to divert product away from sites / areas

On-scene inspections by the FOSC Historic Properties Specialist or individual(s) authorized by the Federal OSC Historic Properties Specialist

Participation in Shoreline Cleanup Assessment Teams by the FOSC Historic Properties Specialist or designee

Provision of information on historic properties protection to response personnel

Provision of information to the FOSC on Historic Properties Protection for areas / locations proposed for emergency – response related support activities (e.g. helipads and staging areas)

Note: These response strategies are not listed in order of precedence. In addition, other response strategies for the protection of historic properties may be identified and recommended to the FOSC for use during an incident response.

4741.10 Documentation of Actions Taken

This form should be completed and submitted, along with any additional supporting documentation, in a reasonable and timely manner to the appropriate entities listed below:

Name of incident: _____

Date/time of incident: _____

Location of incident: _____

Brief description of response action approved (including the date) by the Federal On-Scene Coordinator (FOSC) where protecting public health and safety was in conflict with protecting historic properties:

Brief description of why protecting public health and safety could not be accomplished while also protecting historic properties:

FOSC Name and Title:

FOSC Signature:

Date of Signature: _____

Faxed/Emailed to:

SHPO

(Name and fax number of potentially-affected resource managers/trustees):

(Name and fax number of potentially-affected resource managers/trustees):

(Name and fax number of potentially-affected resource managers/trustees):

4742 Endangered Species Protection

The Interagency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities under the National Contingency Plan and the Endangered Species Act (MOA), which was signed by the USCG, among others, aligns the consultation requirements with the pollution response responsibilities outlined in the NCP (40 CFR 300). This document is intended to assist Federal On-Scene Coordinators (FOSCs) in areas where the pre-spill planning called for in the MOA has not yet been completed. It should not be used to replace existing Area Contingency Plan (ACP) provisions developed pursuant to the MOA or existing regional guidance on implementation of the MOA. It should also not be used as a substitute for completing the pre-spill planning called for in the MOA.

4742.1 The Endangered Species Act of 1973

The Endangered Species Act of 1973 (ESA) (16 USC 1531 et seq) was enacted to conserve and recover threatened and endangered species and the ecosystems upon which they depend. The Act is administered by the U.S. Fish and Wildlife Service (USFWS) in the Department of the Interior and NOAA's National Marine Fisheries Service (NOAA Fisheries) in the Department of Commerce. Under Section 7 of the ESA, federal agencies must consult with USFWS and NOAA Fisheries on actions they carry out, permit or fund which may affect listed species or designated critical habitat. ESA Section 7 requires that agencies ensure their actions are not likely to jeopardize listed species or destroy or adversely modify their designated critical habitat. During emergencies such as disasters,

casualties, national defense or security emergencies, and response to oil spills, the ESA allows for emergency consultation during the incident with formal consultation occurring after the incident, if necessary. The emergency consultation procedures are described in the MOA.

4742.2 How the MOA Applies to the FOSC

The MOA, signed by the USCG, Environmental Protection Agency (EPA), NOAA, DOI, FWS, and NOAA Fisheries in July 2001, aligns the ESA consultation requirements with the pollution response responsibilities outlined in the NCP (40 CFR 300). The MOA is intended to be used at the Area Committee level primarily to identify and incorporate plans and procedures to protect listed species and designated critical habitat during pre-spill planning and response activities.

In addition, a guidebook addressing the MOA was developed by its signatory agencies to further facilitate cooperation and understanding between the agencies involved in oil spill planning and response. This cooperation is highly successful when it is established before an incident occurs and needs to continue throughout an incident and the post-incident follow-up and review. By working proactively to identify the potential effects of spill response activities on species and their habitat, and then developing response plans and countermeasures, impacts to listed species and/or critical habitat can be reduced or avoided completely during an incident.

Using the MOA guidebook, the attached appendices were developed to assist FOSCs during Emergency Response and Post Response activities. In the appendices, there are additional recommendations that were developed as a result of the April 2003 Bouchard B. No. 120 spill that occurred in Buzzard's Bay, Massachusetts. Pre-spill planning guidance can be found in Chapter 6 of the MOA Guidebook.

4742.3 References

Regulations regarding ESA consultation are found in 50 CFR 402, located at: 2004 CFR Title 50, Volume 6 Interagency Cooperation - Endangered Species

The Interagency Memorandum of Agreement Regarding Spill Planning and Response Activities under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act available at:

<https://www.nrt.org> – Under Guidance, Technical Assistance & Planning - ESA MOU

The guidebook for the MOU is also available in the same location.

[https://www.nrt.org/Production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-269GuidebookforESAMOU/\\$File/MOATrainingManualVersion02.pdf?OpenElement](https://www.nrt.org/Production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-269GuidebookforESAMOU/$File/MOATrainingManualVersion02.pdf?OpenElement).

4742.4 Oil Spill Emergency Response Phase

An excerpt from Chapter 7 of the ESA MOA Guidebook

FOSC notifies appropriate representatives of NOAA Fisheries, USFWS, State Natural Resource Trustees, Tribes and/or other agencies and stakeholders once an oil spill has occurred where the potential for impacting environmentally sensitive areas, endangered species and/or critical habitats from spill response activities exists. Use pre-identified points of contact or “Notification List” from ACP to contact the Service regional or field office directly and to notify the RRT representatives of DOI and DOC.

FOSC gathers information about sensitive areas, endangered species, or critical habitat that may potentially be impacted by a Federal action: 1) As soon as possible after the spill has occurred, determine data needs and who will be providing or collecting the data. 2) Use or develop data collection forms to facilitate consistent and precise data compilation.

If listed species or critical habitats are impacted or could be present in the area affected by response activities, initiate emergency consultation by contacting the USFWS and/or NOAA Fisheries through agreed-upon procedures.

Appoint a Technical Specialist within the Planning Section to serve as the Endangered Species expert to help ensure that the necessary information, using terminology understood by USFWS and/or NOAA Fisheries, is gathered. If appropriate, the NOAA SSC and/or the USFWS rep may coordinate endangered species expertise for the FOSC.

If there is no USFWS or NOAA Fisheries representative in the ICS, but they are aware of the situation, the FOSC must ensure that the NOAA SSC and DOI are apprised of the situation. Information gathered will be used in the ESA consultation.

Note: As necessary, the FOSC can make funding available to USFWS and/or NOAA Fisheries for costs incurred in providing any agreed upon assistance such as preparing the Biological Assessment or Biological Evaluation. However, the USFWS and/or NOAA Fisheries are not reimbursed for completing a Biological Opinion. Pollution Removal Funding

Authorization guidance can be found:
<http://www.uscg.mil/hq/npfc/tops.htm>

Implement ACP for initial response actions.

Develop Incident Action Plan with strategies based on the specifics of the spill situation. This plan will serve as formal documentation of actions directed to minimize the impacts of response actions.

Emergency consultation continues until the FOSC determines that the spill response is complete. *Recommendation:* Develop/seek alignment on clean-up methodologies and cessation of operations with consensus from resource managers, specialists and responders, and revisit as clean up progresses toward a conclusion.

USFWS and/or NOAA Fisheries provide the FOSC with timely recommendations to avoid and/or minimize impacts to listed species and critical habitat. If an incidental take is anticipated, USFWS and/or NOAA Fisheries would advise FOSC of ways to minimize this, or, if this is not possible, document the actual take of listed species. A *“take* is defined in the ESA as: "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The USFWS has defined "harm" as "an act which actually kills or injures wildlife" (50 C.F.R. § 17.3).

The regulation further explains that "[such an] act may include significant habitat modification where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering."

The FOSC requests USFWS and/or NOAA Fisheries representatives on-scene (or someone else mutually agreed upon) to gather and document the information necessary for post-emergency Formal Consultation, including:

Description of the emergency (the oil spill response).

Evaluation of the emergency response actions and their impacts on listed species and their habitats, including documentation of how USFWS and/or NOAA Fisheries recommendations were implemented, and the results of implementation in minimizing take. Comparison of the emergency response actions with the pre-planned countermeasures and information in the ACP.

The FOSC should ensure that the above checklist is completed before the case is closed. *Recommendation:*

To obtain timely information on oil spill response impacts, provide a short form for the SCAT team to be completed daily for sites with listed species. The daily site form should contain the following fields (at a minimum):

Staff (numbers) Actions taken Equipment used Time working Checkboxes for weather (sunny, cloudy, etc) Wrack (wet seaweed at high tide line) removed? (Y/N)

All forms should emphasize the need for more detail when there are extraordinary circumstances, such as nest abandonment, thought to be related to the response.

Notify/alert Service representatives, NOAA SSC and/or DOI representative of any changes in response operations due to weather, extended operations or some other circumstance.

Obtain information from Services of seasonal variances (e.g. bird migration), or other natural occurrences affecting the resource.

FOSC or a representative designated by the FOSC should maintain a record of all written and oral communications during the response (consult the ESA MOA for a means for tracking this information), to include recommended response procedures and incidental take.

4742.5 Post-Response Phase

An excerpt from Chapter 8 of the ESA MOA Guidebook

FOSC determines when removal operations are complete and closes the case ensuring that lessons learned are recorded, documentation is filed and Area Committee is advised of any necessary changes to the ACP.

Note: The Emergency Consultation Checklist from the MOA Guidebook should be compiled BEFORE the FOSC determines that the response operations are completed and the case is closed. Oil Spill Liability Trust Fund (OSLTF) funding is not available AFTER the case is closed.

FOSC, USFWS and NOAA Fisheries jointly evaluate the impacts of response activities on listed species and critical habitat. *Note:* This is to be based on information gathered during the response, not on any new studies.

If joint evaluation concludes that listed species and/or critical habitat were not adversely affected by response activities, the consultation process is complete. The FOSC must send a letter to USFWS and/or NOAA Fisheries including: Report of this agreement; and, Request a letter of concurrence from USFWS and/or NOAA Fisheries.

If joint evaluation results in a disagreement between USFWS, NOAA Fisheries, and the FOSC, USFWS and/or NOAA Fisheries will send the FOSC a letter stating why they believe there were adverse effects on listed species or critical habitat. The FOSC may act on the USFWS/NOAA Fisheries reply or simply document the response.

If impacts have occurred, the FOSC sends a letter to USFWS and/or NOAA Fisheries to initiate *Formal Consultation*. Enclose the information gathered during the response with any modifications that may have been made during the post-response joint evaluation. This can be done by finalizing the Emergency Consultation Checklist from Appendix B of the MOA and submitting it with a cover letter and a request for formal consultation from Appendix E as an initiation package to the Service(s). Also see Activity 11: Documenting the Risk Assessment, pg. 65 of the Guidebook.

Note: If a Service representative assists in preparing the initiation package, the same representative will NOT be responsible for reviewing it or preparing the biological opinion.

The USFWS and/or NOAA Fisheries have 30 days from receipt of the initiation package to determine if the package is complete. When complete, they normally issue a Biological Opinion within 135 days.

4743 Essential Fish Habitat Protection During Emergency Spill Response

Operations for Oil Discharges and Hazardous Substance Releases

This section is intended to assist Federal On-Scene Coordinators (FOSCs) in areas where the pre-spill planning activities called for under the Magnuson-Stevens Fishery Conservation and Management Act have not yet been completed. However, this document is not intended to be an all-inclusive technical reference for reducing or eliminating all possible adverse effects to Essential Fish Habitat (EFH). It should also not be used to replace existing Area Contingency Plan (ACP) provisions developed pursuant to the protection of EFH.

4743.1 The Magnuson-Stevens Fishery Conservation and Management Act

In 1996 the Magnuson Fisheries Conservation Act was amended by the Sustainable Fisheries Act to include a number of new mandates, and was subsequently renamed the Magnuson-Stevens Fishery Conservation Act (MSA) (16 USC 1801 et seq). The MSA established procedures designed to identify, conserve, and enhance EFH for those species regulated under a Federal fisheries management plan (FMP). EFH is defined as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity” and can include rivers, estuaries, bays and open ocean (out to 200 miles).

Under Section 305(b)(2) of the MSA, Federal action agencies are required to consult with NOAA’s National Marine Fisheries Service (NOAA Fisheries) on all actions, or proposed actions, authorized, funded, or undertaken by the agency that may adversely affect EFH.

Consultation involves the submission of an EFH assessment to NOAA Fisheries for actions including emergency responses to oil discharges and hazardous substance releases.

4743.2 The EFH Consultation Process and How it Applies to USCG FOSCs

The EFH consultation process is in place to ensure that Federal agencies consider the effects of their actions on EFH, with the goal of “maintain[ing] fish production consistent

with a sustainable fishery and the managed species contribution to a healthy ecosystem" (50 CFR 600.815(a)(2)(i)(C)(4)).

The process as outlined in this FOSC guide satisfies the Federal agency consultation and response requirements of Sections 305(b)(2) and 305(b)(4)(B) of the MSA, as well as the EFH conservation recommendation requirement of MSA Section 305(b)(4)(A).

As with the Endangered Species Act, FOSCs determine when an action “may adversely affect” EFH. Once the FOSC has identified an action that may adversely affect EFH, the FOSC must notify NOAA Fisheries and provide an EFH Assessment.

Once NOAA Fisheries receives the Assessment, it provides recommendations to the FOSC within 30 days regarding the actions taken or to be taken. The FOSC is then required to provide a detailed response in writing to NOAA Fisheries within 30 days of receiving the recommendation.

Alternatively, if the FOSC determines that there are “no adverse affects,” the FOSC is not required to notify NOAA Fisheries of its findings and actions related to the spill response.

However, NOAA Fisheries on their own may decide that an action may adversely affect EFH and send their recommendations to the FOSC. In this case, the FOSC must respond to NOAA Fisheries in writing within 30 days. The FOSC’s response to NOAA Fisheries shall include a description of measures proposed to avoid, mitigate, or offset the impact of the activity on EFH. In cases where the FOSC is not in agreement with the recommendations by NOAA Fisheries, the FOSC should at a minimum explain the reasons for not following the recommendations.

The FOSC should contact NOAA Fisheries early in emergency response planning, but may consult after-the-fact if consultation on an expedited basis is not practicable before taking action (50 CFR 600.920(a)(1)).

To the extent practicable, the Scientific Support Coordinator (SSC) or FOSC should notify NOAA Fisheries of the activities being taken and whether or not time allows for upfront consultation. Additionally, the FOSC and NOAA Fisheries may agree to combine an EFH consultation into an already established consultation process, such as those for the ESA or the National Environmental Protection Act (NEPA), for the same incident, provided all the information required for EFH is documented.

In the development of an Incident Action Plan, refer to the *Emergency Response Checklist for EFH during Oil Discharges and Releases of Hazardous Substances*.

FOSCs are also encouraged to work with applicable Regional Response Teams and Area Committees before an oil discharge or a hazardous substance release to update their ACPs with methods on how to minimize, mitigate, or avoid adverse effects to EFH.

4743.3 What is Required in an EFH Assessment?

For the consultation process, the EFH Assessment *must* include the following (50 CFR 600.920(e)(3)):

- (1) Description of the action (level of detail must correspond to magnitude and complexity of potential effects);
- (2) Analysis of the potential adverse effects of the action on EFH and the managed species;
- (3) Federal agency's conclusions regarding the effects of the action on EFH; and
- (4) Proposed mitigation, if applicable.

The EFH Assessment *should* include:

- (1) Description of the spill;
- (2) Conclusions of the USCG (through the Area Committee and/or FOOSC) regarding the effects of the action on EFH; and (3) EFH Assessments submitted to NOAA Fisheries shall employ one or both of the following formats as necessary:

Use of Existing Environmental Consultation Procedures for EFH Consultation

NOAA Fisheries encourages this procedure to streamline the EFH consultation process. As long as an existing process clearly identifies in a separate section of the document the information required to satisfy an EFH Assessment, and the process will provide NOAA Fisheries with timely notification, the assessment may be incorporated into documents prepared for other purposes. Examples of such documents include Endangered Species Act Biological Assessments pursuant to 40 CFR 402 and the National Environmental Policy Act documents and public notices pursuant to 40 CFR 1500.

Abbreviated and Expanded Consultation

Abbreviated consultation procedures should be used when the adverse effects of an action can be alleviated through minor modifications to the action. However, in cases where Federal actions would result in substantial adverse effects to EFH, expanded consultation procedures must be used. Expanded consultation allows maximum opportunity for NOAA Fisheries and the Federal agency to work together to review the action's impacts on EFH and to develop EFH conservation recommendations. If appropriate, NOAA Fisheries may conduct a site visit.

4743.4 References

EFH Policy Regulations

Procedures for identification of EFH and the consultation process can be found at:
<http://www.habitat.noaa.gov/protection/efh/consultations.html>

Essential Fish Habitat locations may be found via liaison with County, state and federal members of the Area Committee.

EFH Consultation Guidance

Includes information on the procedures that have been developed to assist NOAA Fisheries and other Federal agencies in addressing the EFH coordination and consultation requirements:

<http://www.habitat.noaa.gov/protection/efh/consultations.html>

EFH Assessment Guidance

Intended to assist Federal agencies in developing EFH Assessments. The guide contains EFH definitions, responses to frequently asked questions concerning preparation of EFH Assessments, and gives three examples of completed EFH Assessments:

<http://www.habitat.noaa.gov/protection/efh/consultations.html>

NOAA Fisheries EFH Regional Contacts:

<http://www.habitat.noaa.gov/protection/efh/regionalcontacts.html>

4743.5 Emergency Response Checklist for EFH During Oil Discharges and Releases of Hazardous Substances

FOSC notifies Department of Interior/NOAA representative to the RRT of any actual or potential adverse effects to EFH.

FOSC notifies NOAA Fisheries regional staff of actual or potential adverse effects to EFH. Notification should occur in writing.

Note: The National Response Center's (NRC) flash fax notification of a spill to NOAA does not meet this requirement.

If consultation during the emergency response phase is not practicable, the FOSC may consult with NOAA Fisheries after-the-fact, as per 50 CFR 600.920(1)(a).

FOSC provides NOAA Fisheries an EFH Assessment for spill activities:

Description of discharge or release
Description of area which may be affected
Description of spill response actions

Analysis of the potential adverse effect(s) of the response actions on EFH and the managed species

USCG recommendations/conclusions regarding the effects of the action on EFH

Proposed mitigation, if applicable

Supplemental information, if appropriate, for EFH Assessment:

Results of on-site inspection evaluating habitat and site-specific effects

Views of recognized experts on the habitat or species affected

Review of pertinent literature and related information

Analysis of alternatives to the response actions taken Other relevant information

FOSC notifies NOAA Fisheries of changes in response operations due to weather, extended operations, or some other circumstance.

FOSC obtains information on seasonal variances or other natural occurrences affecting EFH from NOAA Fisheries.

FOSC provides a detailed response in writing within 30 days of receiving EFH

Conservation Recommendations from NOAA Fisheries, unless otherwise agreed to.

SSC provides NOAA Fisheries a response regarding EFH Conservation

Recommendations after the FOSC determines that removal operations are completed IAW with 40 CFR 300.320(b). If operations are not complete then send an interim response:

Description of spill response

Evaluation of emergency response actions & their impacts on EFH to

include documentation of how NOAA Fisheries recommendations were implemented and results of implementation in minimizing adverse effects to EFH

A comparison of the emergency response actions with the pre-planned countermeasures from the ACP

4744 Legal

The CG FOSC should consult with USCG District 8 for advisory capacity during an oil spill response.

4744.1 USCG MLC Atlantic Area Legal Division

The Maintenance and Logistics Command (MLC) offers legal support within the U.S. Coast Guard. The Chief of the Legal Division is the principle legal advisor and Staff Judge Advocate to Commander, Atlantic Area/Fifth District/Maritime Defense Zone Atlantic, Commander Maintenance and Logistics Command Atlantic, their respective staffs, and subordinate units.

Maintenance & Logistics Command Atlantic Legal (<http://www.uscg.mil/lsc/>)

4744.2 FL, AL, and MS Office of the Attorney General

See Section 9221 Government Official Liaisons (Under development by Sector Mobile Planning Department).

4744.3 U.S. Department of Justice

The U.S. Department of Justice provides the highest level of legal advice within the Federal Government. The Environment and Natural Resources Division (ENRD) is responsible for litigation ranging from: protection of endangered species, to global climate change, to cleaning up the nation's hazardous waste sites. Nearly one-half of the Division's lawyers enforce the nation's civil and criminal environmental laws and the challenges to government programs and activities. It represents the United States in all matters concerning the protection, use, and development of the nation's natural resources and public lands, wildlife protection, Native American rights and claims, and the acquisition of federal property.

United States Department of Justice
USDOJ: Environment and Natural Resources Division

4745 Chaplain

[Reserved for future Area Planning Committee Development].

4746 Public Health

[Reserved for future Area Planning Committee Development].

4747 Human Resources

[Reserved for future Area Planning Committee Development].

4748 Critical Incident Stress Management

COMDTINST 1754.3 - Critical Incident Stress Management

- (1) To request Services: 1-855-247-8778
- (2) Employee Assistance Program (EAP) referrals to counseling services:

4750 Law Enforcement

See Section: 3360 Law Enforcement Group

4760 Search and Rescue

See Section: 3310 Search and Rescue (SAR) Group

4770 Marine Casualties

4770.1 Notification of Marine Casualties

Regulations contained in **46 Part 4** of the Code of Federal Regulations require owners, agents, masters, operators, or persons in charge, immediately after addressing resultant safety concerns, to notify the nearest Coast Guard Sector whenever a vessel is involved in a marine casualty. These casualties include:

- An unintended grounding or an unintended strike of, or allision, with a bridge;
- An intended grounding, or an intended strike of a bridge, that creates a hazard to navigation, the environment, or the safety of a vessel;
- Loss of main propulsion, primary steering, or any associated component or control system that reduces the maneuverability of the vessel;
- An occurrence that adversely affects the vessel's seaworthiness or fitness for service or route, including fire, flooding, or failure of or damage to fixed fire extinguishing systems, life saving equipment, auxiliary power generating equipment, or bilge pumping systems;
- Loss of life;
- An injury that requires professional medical treatment;
- Any occurrence resulting in more than \$25,000 of property damage, not including salvage cost.

33 Part 160.215 requires vessels carrying hazardous materials to notify the nearest Coast Guard Sector whenever a hazardous condition exists, either aboard a vessel or caused by a vessel or its operation.

4770.2 Responsibilities of the Responsible Party

In the case of an incident, the Responsible Party (RP) must take adequate measures to mitigate and/or remove damage, or risk of damage, caused by the vessel or the release of

any materials from the vessel. The RP will pay for all legitimate response measures, up to their limit of liability. If an RP cannot be identified, or the acting RP fails to adequately respond, it is the responsibility of the Captain of the Port or FOOSC to take over control of a particular aspect of, or the entire response. In this case, funding will be provided by the federal government until an RP is identified and charged for the response.

4770.3 Types of Marine Casualties

The primary objective in any salvage scenario, whether a single event casualty or combination of casualties, is to minimize the risk to human health, the environment, and property. The following six types of casualties are listed in order of frequency:

(1) Hull or Machinery Damage: A vessel's hull or machinery may be damaged by shifting cargo, storm damage, or other causes, and may render a vessel unable to maneuver. The greatest threats to the vessel, cargo, and environment exist when loss of maneuverability happens close to shore or hazards to navigation. Use of anchors or towing vessels may be the best defense in slowing the unintended movement of a vessel drifting towards a hazard.

(2) Stranding or Grounding: Unintentional groundings may result from navigational error, anchor drag, loss of maneuverability, or for other reasons. Ground reaction, which is usually measured in long tons or metric tons, is the weight of the vessel that is being supported by the ocean bottom instead of the water. Ground reaction can cause a vessel to capsize, become holed, break apart, or become difficult to remove from ground. A salvor or naval architect can make a good estimate of ground reaction using the information gathered by the crew or response personnel including pre-casualty drafts, post-casualty drafts, tide cycle, location/depth of ground (usually determined with soundings), and the type of bottom. Once ground reaction is determined, it is fairly simple to estimate the force-to-free, which is the measure of the force needed to pull the vessel off the ground. Force-to-free is usually listed in short tons, which is equivalent to tug bollard pull. In order to float a vessel free or pull it off with tugs/ground tackle, ground reaction must usually be reduced in a controlled manner by deballasting, lightering, and/or tidal lifting.

(3) Collision: The most common result of a collision at sea is hull damage and flooding. Collisions are sometimes accompanied by fire and explosions, as many ship's systems and/or cargo may be damaged upon impact. The general priorities after a collision usually include damage assessment, flooding control, and firefighting.

Typically, a vessel is not well-equipped to handle rapid flooding, and, when left unchecked, can lead to capsizing and foundering. Often vessel crews are not well versed in damage control, requiring a prompt response to ensure professional salvors and marine inspectors are on scene as soon as possible.

(4) Fire and Explosion: Fires of any size onboard a vessel should be treated with extreme caution as they may quickly turn into a conflagration. Most commercial vessels will be

equipped with fixed fire fighting systems to contain fires started in the engine room (the most common source of shipboard fires). Large commercial vessel crews are generally trained to combat fires that originate in the engine room or accommodation spaces. Crews are generally not trained to fight fires originating in or spreading to the cargo. Most professional salvors offer shipboard firefighting capability – either with in-house resources or via subcontractor capabilities. Shore based fire fighters often do not have an appreciation for the special considerations for shipboard firefighting, especially fixed fire fighting systems or vessel stability, and therefore should be monitored closely when employed to extinguish a fire in port.

(5) Allision: occur when a vessel strikes a fixed object. Most of the considerations are the same as a collision, with the addition of assessing the damage sustained by the object, especially if the object was a bridge or critical piece of infrastructure.

Immediate notification should be made to the Army Corp of Engineers and Federal and State Departments of Transportation. Appropriate actions should be taken to ensure the object does not pose a risk to future transportation onshore or to other vessels.

(6) Stress Fractures: Stress fractures are failures in the construction of the vessel and may be due to stresses imposed on a vessel because of a heavy seaway, improper loading or ballasting, or construction material fatigue. Cracks can lead to pollution or flooding incidents and, under extreme circumstances, total ship loss. Therefore, it is important to quickly assess the size, location, and orientation of the crack. Surveyors, shipyards, and Coast Guard Marine Inspectors are familiar with methods to arrest or repair cracks.

4770.4 Initial Response and Casualty Assessment

Common to all casualties is a need for the quick and substantial allotment of response resources.

The Unified Command will set the objectives of a vessel casualty response. Early dissemination of an accurate assessment of the vessel's condition and deployment of appropriate response resources is essential.

4770.5 Initial Actions to be taken by the Crew

A prudent vessel captain will take certain actions to mitigate the threat to the crew and vessel. Upon receiving notification of a marine casualty, the Incident Commander should verify that the vessel master, if possible and appropriate, has taken the following actions listed below:

Initial actions to be taken by vessel's crew

- Have ship's personnel report to emergency stations
- Secure watertight fittings
- Take appropriate fire fighting actions
- Notify the ship's operations controller
- Obtain an accurate cargo storage plan
- Request shore personnel request salvage assistance
- Display day shapes & sound appropriate signals

4770.6 Critical Information

There is certain information that is critical to planning a successful salvage operation. This information, essential to the response planning process, should be gathered from the vessel master or on-scene response personnel, as appropriate to the situation. The information gathered should be used to determine the "window of opportunity" - i.e., when the most factors align for a successful operation. Refer to the chart below for incident-specific critical information that should be gathered and shared with all interested parties.

Following the report of an incident, certain initial information must be gained to mount a successful response and salvage operation. This list is not all-inclusive, but may be used to ensure certain critical information is gathered from on-scene personnel as well as from response resources. Many of the ship design particulars may be retrieved from the vessel's Shipboard Oil Pollution Emergency Plan (SOPEP) and Vessel Response Plan (VRP).

Incident Critical Information:

- All Incidents
- Safety status of crew
- Proximity to navigation hazard
- On-scene weather conditions
- Forecasted weather conditions
- Contracted resources
- Potential damage / breaches in hull
- Potential for spill or plume
- Status of ground tackle
- Communications nature and schedule
- Quantity/nature of cargo/fuel/ballast
- Status of propulsion & steering
- Grounding
- Pre-casualty drafts
- Post-casualty drafts
- Tide height at grounding
- Location/depth of soundings
- Time/Height of next high tide
- Liquid level of all tankage
- Availability of salvage resources

Bottom type
Fire
Status of shipboard fire pumps
Status of fixed firefighting systems

Risk of further damage to vessel
Status of emergency electrical systems
Availability of fire fighting resources
Collision/Allision/Flooding
Relative stability of each vessel
Status of ships dewatering systems
DOT, ACOE, State notified (allisions)

4771 Lightering and Salvage

4771.1 Identify Response and Salvage Assets

The RP should immediately contract and set into motion adequate response and salvage resources. Historically, there has been reluctance on behalf of the vessel's representatives to engage a professional salvor. A decision to attempt operations without a professional salvor should be examined critically by the FOSC. To assist the RP in contracting a professional salvor, the FOSC may share information of proven response and salvage resources. In addition to ensuring that the RP has contracted adequate response resources, the FOSC should identify and deploy appropriate Coast Guard resources to respond to the incident. These response teams should include unit Pollution Investigators, Casualty Investigators, and Vessel Inspectors. Furthermore, the SERT team at the Marine Safety Center should be engaged and, potentially, the Navy SUPSALV.

Refer to: 9240.3 Firefighting/Salvage/Divers for resources

4771.2 Setting the First Operational Objectives

Once enough information has been gathered to proceed with a decisive action plan, the USCG Operational Commander, IC or UC will set forth the operational period objectives. These objectives *may* include but are not limited to:

- Evacuate crew
- Control vessel movement
- Get response personnel and equipment on-scene
- Extinguish shipboard fire
- Stop/slow flooding
- Stop/slow vessel movement toward potential hazards
- Contain pollution

- Identify suitable port of refuge
- Create a salvage plan
- Mitigate potential impacts of the casualty on other vessel traffic and port activities
- Evaluate risk to public- i.e., hazardous material release, air quality, etc.
- Prepare and approve press release
- Establish a safety zone Contact all appropriate Federal, State and local agencies, as well as foreign governments
- Evaluate/mitigate the environmental impacts of incident
- Identify an appropriate lightering vessel.

4771.3 Oil/Hazardous Material Release Mitigation and Lightering

Oil spills or hazardous material releases are of the greatest potential during groundings and almost a certainty during a major collision or other event when there is a breach in the hull. There are several ways to establish if there is an oil spill or hazardous material release. The primary method may be observation of a sheen emanating from the damaged vessel. However, this method may be of limited usefulness at night and is not indicative of damages inboard of the hull structure. Bunker and cargo tanks should be immediately sounded and monitored closely for changes that would indicate a breach. Given the high correlation between major marine casualties and pollution incidents, it is prudent to provide, at a minimum, a containment boom to surround the vessel(s).

4771.4 Lightering

One of the most effective ways to mitigate or prevent an oil spill or hazardous material release is to remove all remaining cargo and unnecessary bunker fuel from the vessel.

This is particularly useful when the risk of a hull breach is increasing due to changing environmental or physical conditions on the vessel. Vessels may be lightered to another vessel, or lightered to mobile facilities ashore. Choosing which is most appropriate will depend on the location of the vessel and availability of each. Whichever is chosen, it is important to ensure the receiving vessel or facility is qualified to handle the lightered material and that any cargo/residue in hoses and holding tanks are compatible with lightered material. Furthermore, the effects on the stability of the vessel should be taken into account when lightering a vessel. While lightering may present benefits when attempting to re-float a vessel, it may also present additional structural stresses upon the vessel. It is important to work with naval architects as well as the person in charge of loading/offloading the vessel, who is frequently the Chief Officer or First Mate of the vessel.

4771. 5 Vessel/Cargo Salvage Plan Review

A plan is essential to any successful salvage operation. Depending on the urgency and complexity of the operation, the quality of the plan may vary from a bound document approved by engineers to a sketch on a cocktail napkin. All involved parties must ensure that the plan provided is appropriate given the constraints of the operation.

When evaluating a salvage plan, it is essential to rely upon the resources available to an IC or UC for these particular incidents. The two major public resources are the Coast Guard's SERT and the Navy's SUPSALV.

Refer to 9240.3 Firefighting/Salvage/ Divers for resources.

Given optimal conditions as well as time and resources available, a *complete* salvage plan should include the following elements:

All Incidents

Pre-incident drafts fore and aft

Cargo listing / volume

Fuel volume

Status of vessel propulsion and steering systems

Post casualty drafts

Contingency planning identifying possible failure points

Lightering considerations

Clear understanding or contractual agreement of responsibility for control of vessel

Strength of hull girder, damaged areas, attachment points, and rigging

Booming considerations

Means for controlling interference between pollution response and salvage efforts

Potential pollution risks and precautions to avoid or minimize impact

Communications plan

Anticipated start time and predicted tides, currents, weather

Grounding

Post casualty drafts/locations/soundings

Bottom type

Estimated ground reaction

Force-to-free

Towing assets available/utilized and horse power of each

Predicted stability when re-floated

A summary of the engineering rationale for retraction & refloating techniques

Tow/rigging plan including attachment points

Lightering

Volume of cargo/fuel to be lightered

Type of cargo to be lightered

Identification of compatible receiving facilities

Special procedures to handle hazardous cargo/materials

Flooding

Identification and listing of all dewatering systems to be employed

Order of dewatering to ensure satisfactory stability of vessel

Transit Plan

Identification of transit route and final destination

Means for controlling the vessel as it is freed

Route identified, with special attention to increased draft and beaching areas

Vessel escorts, if any, to be employed and horse power of each

Any preparation of vessel necessary to gain permission for entry into destination

For assistance in putting together a detailed or long term salvage plan use the SERT Plan and Information Sheet. (Not all sections are applicable to every salvage evolution).

When requesting SERT assistance the Rapid Salvage Survey form which contains the minimum essential casualty details, should be utilized.

4771.6 Resources

4771.6.1 Marine Safety Center Salvage Emergency Response Team (SERT)

The Marine Safety Center Salvage Emergency Response Team (SERT) is on call to provide immediate salvage engineering support to the Coast Guard Captains of the Port (COTP) and Federal On-Scene Coordinators (FOSC) in response to a variety of vessel casualties.

Specifically, SERT can assist the COTP and FOSC manage and minimize the risk to people, the environment, and property when responding to vessels that have experienced a casualty. SERT provides this assistance by performing numerous technical evaluations including: assessment and analysis of intact and damaged stability, hull stress and strength, grounding and freeing forces, prediction of oil/hazardous substance outflow, and expertise on passenger vessel construction, fire protection, and safety. SERT has mobile computing capability for on-scene deployment. The MSC maintains a database containing over 5,000 hull files that can be used to generate computer models of vessels used in salvage engineering. External relationships with organizations like the Navy Supervisor of Salvage (SUPSALV), Coast Guard Intel Coordination Center, and the Office of Naval Intelligence (ONI), as well as all major class societies, also enable the salvage team to quickly locate and transfer information about a damaged vessel that would otherwise be difficult to access.

When requesting SERT assistance, the Rapid Salvage Survey Form, which contains the minimum essential casualty details, should be utilized; call (202) 327-3985/3987 (24 hours) or the Coast Guard Command Center at (800) 323-7233 (24 hours). The Survey form and the information required for the creation of a salvage plan are available at: CG Homeport – www.homeport.uscg.mil - Under Missions Tab/Marine Safety Center/Salvage Engineering.

4771.6.2 USCG Strike Teams

The National Strike Force (NSF) was established in 1973 as a direct result of the Federal Water Pollution Control Act of 1972. The NSF's mission is to provide highly trained, experienced personnel and specialized equipment to Coast Guard and other federal agencies to facilitate preparedness and response to oil and hazardous substance pollution incidents in order to protect public health and the environment. The NSF's area of responsibility covers all Coast Guard Districts and Federal Response Regions.

The Strike Teams provide rapid response support in incident management, site safety, contractor performance monitoring, resource documentation, response strategies, hazard assessment, oil spill dispersant and operational effectiveness monitoring, and high capacity lightering and offshore skimming capabilities.

National Strike Team Coordination Center: 252-331-6000 (24 hours).

4771.6.3 NAVSEA Supervisor of Salvage and Diving

The Office of the Director of Ocean Engineering, Supervisor of Salvage and Diving (SUPSALV), is a component of the Naval Sea Systems Command (NAVSEA). SUPSALV is located at the Washington Navy Yard in Washington, DC. SUPSALV is responsible for all aspects of ocean engineering, including salvage, in-water ship repair, contracting, towing, diving safety, and equipment maintenance and procurement.

The Salvage Operations Division maintains standing worldwide commercial contracts for salvage, emergency towing, deep ocean search and recovery operations, and oil pollution abatement. Additionally, they own, maintain and operate the worldwide Emergency Ship Salvage Material (ESSM) system, which incorporates the world's largest standby inventory of salvage and pollution abatement equipment. They also own, maintain, and operate a large number of deep ocean search and recovery systems, with depth capabilities up to 20,000 feet. They also routinely provide salvage technical assistance to fleet salvors, as well as to other federal agencies.

Within the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), SUPSALV has been assigned as 1 of 7 "Special Teams" available to the Federal On-Scene Coordinator (FOSC). Thus, they provide assistance (personnel and/or equipment) for commercial oil or hazardous substance spills, or potential spills (i.e., salvage operations), as requested by any FOSC. Assistance ranges from salvage technical or operational assistance to mobilization of SUPSALV and other Navy resources to support

a partial or full federal response to a marine casualty. Be aware, however, these services are provided on a reimbursable basis only – *they are not free*.

4771.6.4 American Salvage Association

Leading U.S. salvors have formed the American Salvage Association (ASA). Created in response to the need for providing an identity to the U.S. marine salvage and firefighting response, the intention of the ASA is to make professional and improve marine casualty response in U.S. coastal and inland waters. The American Salvage Association meets with various federal and state agencies to exchange views on the improvement of salvage and firefighting response in the U.S.

4771.6.4 References

American Salvage Association (ASA) Safety Standards, March 2003.
Available at: <http://www.americansalvage.org/>

George, W. E., 1983. Stability and Trim for the Ship's Officer. Cornell Maritime Press, Centreville, Maryland.

Milwee, W. I. Jr., 1996. Modern Marine Salvage. Cornell Maritime Press, Centreville, Maryland.

NAVSEA Instruction 4740.8 (series), Salvage, Recovery and Open Sea Spill Response Programs.

Naval Sea Systems Command letter dated October 28, 2004. "Emergency Response Resources Available to Navy and Other Federal Agencies Through the Navy Supervisor of Salvage." Available at: <http://www.supsalv.org/>.

OPNAV Instruction 4740.2 (series), Salvage and Recovery Program.

SeaRiver Emergency Response Plan, West Coast Notifications Field Manual, September 1997.

U.S. Coast Guard Marine Safety Center available at:
www.homeport.uscg.mil Under Missions Tab.

4772 Marine Firefighting

See Section 8000: MARINE FIREFIGHTING PLAN (Marine Fighting Plan Currently Under Development. Contingency Planning Department 7 January 2013.

4800 Required Correspondence, Permits, and Consultation

4810 Notice of Federal Interest

Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.B.3.a.

The OSC shall present a **Notice of Federal Interest for an Oil Pollution Incident Form (CG 5549)** to every suspected discharger. [NOTE: This requirement is for internal direction only. The failure of an OSC to present this Notice in a given case does not affect any liability of any person which may arise in that case.] This informs the suspected discharger of a potential violation of the FWPCA, as amended, and of his or her possible liability to a civil penalty. Notice should also be made in potential pollution incidents when the actions of the potential discharger to abate the threat are considered insufficient, and Federal action is contemplated. If possible, any witness(es) should accompany the OSC's representative when the Notice is served. The OSC's representative shall retain the OSC's copy of the Notice that is signed and dated by the suspected discharger, or the suspected discharger's representative. If the discharger refuses to sign, the Notice will still be served. The investigator will note the circumstances on the copy, Sign and date it, and have the witness(es) sign and date it. Should the owner/operator be unavailable, the Notice shall be sent via Certified mail, return receipt requested.

4811 Administrative Orders

An “Administrative Order” is a specific directive from the FOSC requiring detailed actions or corrective measures to be taken by the responsible party to clean up a pollutant or threatened discharge/release of a pollutant. An Administrative Order may be issued to the responsible party to direct certain response actions when cooperative efforts between the FOSC and the responsible party fail to garner the required response. The Administrative Order may also direct compliance with a request to enter or inspect any vessel, facility, establishment, place, property, or location where there is a reasonable basis to believe that there has been or may be a release, or, for any space necessary to enter in responding to that release. Administrative Orders may be either oral or written. However, if the OSC or their representative issues an oral order, it should be immediately followed by a written document that contains the dialogue of the order.

(1) Authority to Issue Orders

- The Clean Water Act of 1977(CWA), as amended by the Oil Pollution Act of 1990 (OPA). [See Title 33 USC 1321(e)(1)(B)].

(2) Direct the Administrative Order to the person identified as the Responsible Party

- The OSC must be reasonably certain that the person to whom the order is issued is in fact the person responsible for the spill or release. (The order should be directed to a company or corporation as opposed to an individual when possible).

(3) The OSC may issue an Administrative Order for Oil Spills and Hazardous Substance Releases under provisions of CWA/OPA for the following:

- When there is a discharge of oil and hazardous substances from a facility/vessel in harmful quantities into the navigable waterways of the United States. Note: The CWA defined “harmful quantity” of oil in 40 CFR 109.2 and “reportable quantity” for designated hazardous substances in 40 CFR 117.3.
- When there may be an imminent and substantial threat to the public health or welfare of the United States, including fish, shellfish, and wildlife, public and private property, shorelines, beaches, habitat, and other living and nonliving natural resources under the jurisdiction or control of the United States. [See 33 CFR 1.01-80(d)(4), 40 CFR 300.322(b), or 33 USC 1321(e)(1)(B)].
- When the OSC feels that the spiller is reluctant or not performing a satisfactory clean up.

(4) Prior to issuing an Administrative Order, the affected State or States must be notified. (See 33 USC 1321(e)(1)(B) or Section 4306 of OPA).

(5) Penalties for Non-compliance

- If the responsible party fails to respond to an oil spill that is his/her responsibility, he/she is liable for a civil penalty of \$27,500 per day of violation or an amount up to 3 times the removal cost incurred by the Oil Spill Liability Trust Fund (OSLTF). [See 33 USC 1321(b)(7)(B)(ii)].

(6) Appeals

- A responsible party issued an administrative order for an oil pollution incident must direct the request for an appeal to the district courts of the United States. [See 33 USC 1321(e)(2)].

(7) Additional References

- Environmental Law Handbook (This book explains the Laws in the Environmental Statutes), Published by Government Institutes.
- Executive Order 12580 (52 FR 2923), Sec.4(c)(1), (The President’s authority to grant the Coast Guard response actions).

4812 Notice of Federal Assumption

Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.B.3.d.

Under FWPCA Section (311)(c)(1), whenever a polluter is unknown or not acting responsibly, or when its removal effort is insufficient, or to present the substantial threat of a discharge, the OSC may assume total or partial control of response activities. The OSC must inform the suspected polluter, if known, of this action by issuing a Notice of Federal Assumption of Response Activities, even if the suspected polluter has not initiated any action. This Notice references the Notice of Federal Interest for an Oil Pollution Incident and indicates the date and time the Federal response is initiated. The same procedures used for issuing and obtaining signatures for the Notice of Federal Interest for an Oil Pollution Incident apply. Figure 7-4 is a sample Notice of Federal Assumption of Response Activities. [NOTE: This requirement is for internal direction only. The failure of an OSC to present a Notice of Federal Assumption of Response Activities in a given case does not affect any liability of any person which may arise in that case.] In some instances, the OSC may determine that the polluter's response efforts should continue, but that some Federal assistance is necessary to augment the cleanup (e.g., cleanup resources that the polluter cannot or will not provide). Whenever it is necessary for the federal government to expend funds in support of a cleanup operation, for purposes other than monitoring, the OSC should declare a Federal spill for the area(s) for which he or she is assuming control, activate the OSLTF to cover expenses and take whatever actions are necessary to ensure a proper cleanup. In these cases, the Notice of Federal Assumption shall clearly delineate those actions or areas for which the OSC is assuming control or providing other resources. [NOTE: The term "declare a Federal spill" as used in this chapter means: in the case where a suspected polluter has been identified, the presentment of the Notice of Federal Assumption; or in other cases, the initiation of Federal removal operation.

Sample Notice of Federal Assumption of Response Activities

(Name / Address)

Gentlemen:

My letter of (_Date____) notified you of federal interest in an actual or potential pollution incident at (vessel / facility) at (location / body of water), for which you are presently considered financially responsible.

You are hereby given notice that your actions to abate this threat and to remove the substance(s), and to mitigate (its / their) effects have been evaluated as unsatisfactory by the U. S. Coast Guard On – Scene Coordinator (OSC), (Name). Effective (Date / Time), The Coast Guard will conduct all response activities under the authority of [Section 311 (c)(1) of the Federal Water Pollution Control Act (FWPCA), as amended] [Section 104 (a) (1) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA)]. Removal will be effected in accordance with the criteria of the National Oil and Hazardous Substances Pollution Contingency Plan and federal regulations. You may then be liable for all the removal costs incurred by the federal government as set forth in [Section 311 (f) of the FWPCA] [Section 107 (a) of CERCLA].

Should you require further information concerning this matter, you should contact: (Name / Address/ Phone Number of OSC)

Sincerely,

(OSC or Representative)

Received and acknowledged:

(Name of Addressee), (Date / Time) (Witness Name), (Date / Time)

4813 Letter of Designation

Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.

Notice of Designation of Source Policy. Designation of a source under section 1014 of OPA 90 is done to fulfill the requirements relating to the dissemination of information about an incident, through advertisements, so that potential claimants will be aware of the opportunity and procedures for submitting claims for uncompensated removal costs or damages. Exact specification and types of advertisement required are provided in the letter issued by the NPFC. OPA provides that designation of source is done where "possible and appropriate." "Technical Operating Procedures for Designation of Source" can be obtained at: <http://wwwftp.uscg.mil/hq/npfc/source.pdf>.

Sector Mobile will not issue Notices of Designations. The National Pollution Funds Center (NPFC) will designate the source, notify the reporting party/guarantor, and set the advertising requirements. In the event that it appears there is a reasonable possibility for claims in a given incident, but the source is not known, the OSC immediately notifies the NPFC. The NPFC will then advertise as required under section 1014(c) of OPA.

4820 Fish and Wildlife Permits

A Federal Migratory Bird Rehabilitation Permit will authorize you to take, transport and temporarily possess sick, injured, and orphaned migratory birds for rehabilitation purposes. You should review 50 CFR parts 10, 13 & 21.31 of the Code of Federal Regulations

Fill out the application at the link below and send completed application forms to the Regional Permit Office:

Region IV Permit office
P.O. Box 49208
Atlanta, GA 30359

Or email them to: permitsR4MB@fws.gov

<http://www.fws.gov/forms/3-200-10b.pdf>

4830 ESA Consultations

Section 7(a)(1) of the Endangered Species Act (ESA) requires all federal agencies, in consultation with the NOAA National Marine Fisheries service, to ensure that their response actions do not jeopardize listed species or destroy or adversely modify critical habitat. As a result of this consultation, recommended procedures are developed that will achieve better conservation of listed species and critical habitat during implementation of oil spill response activities.

For consultations to the NOAA National Marine Fisheries Service, utilize the *RRT IV Endangered Species Consultation* document, which can be downloaded at:

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_ivopsmanual.htm.

If this link does not work go to <http://www.rrt4.nrt.org/> under “plans, manuals, & Guidance Documents.

The following is the emergency point of contact for initiating the consultation within Regional Response Team IV:

See also NOAA NMFS Protected Resources Division -

(<http://sero.nmfs.noaa.gov/pr/pr.htm>) provides internal guidance and establishes national policy for conducting consultation and conferences pursuant to section 7 of the Endangered Species Act of 1973, as amended. The website addresses the major consultation processes, including informal, formal, emergency, and special consultations, and conferences.

4840 National/State Historical Properties Preservation Consultations

The National Historic Preservation Act requires federal agencies to take into account the effects of response actions on historic properties when responding to spills. As the federal official designated to coordinate and direct response actions, the Federal On-Scene Coordinator (FOSC) is responsible for ensuring historic properties are appropriately considered while planning and during a spill response. Historic properties include any prehistoric or historic district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places (36 CFR Part 60).

The listing of these sites is not currently included in this plan; however detailed maps identifying historic sites are available from the according state where the incident took place. Most historic sites are located on land and are not likely to be impacted by spills of oil or hazardous substances. However, many sites are located near the water, which can be adversely impacted by containment and recovery operations. Heavy equipment is particularly harmful to archeological sites and the FOSC should use other methods of

containment and recovery in these areas. Some historic sites are located underwater and may be damaged by an oil or hazardous substance spill. However, even underwater, the sites are more likely to be adversely impacted by containment and recovery operations than the spill itself.

Before conducting containment or recovery operations on a historic site, the FOSC should contact the states department of environmental management and/or the Division of Historical Resources to determine the sensitivity of the site. They may also be able to assist in identifying which containment and recovery techniques are least likely to impact the historic site.

The *Programmatic Agreement on Protection of Historic Properties and Cultural Resources during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* or Programmatic Agreement (PA) requires consideration of historic properties in planning for and conduct of emergency response under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The PA was developed to help Federal agencies sufficiently comply with the requirements of the statute. This document is intended to assist Federal On-Scene Coordinators (FOSCs) in areas where the pre-spill planning called for in the PA has not yet been completed. However, it should not be used to replace existing regional Pas developed pursuant to the national PA or existing Area Contingency Plan (ACP) provisions developed pursuant to a regional or the national PA. It should also not be used as a substitute for completing the pre-spill planning called for in the PA.

The PA provides an alternative to the process in Section 106 of the NHPA to ensure appropriate consideration of historic properties within the context of the NHPA during emergency response to a discharge or a release under the NCP (40 CFR 300). The alternative to following the process in the PA, including the pre-spill planning part of the process, is to follow the complete consultation process in Section 106 of the NHPA.

During pre-spill planning activities, the PA calls for identifying:

- historic properties and cultural resources listed in, or determined to be eligible for listing in, the National Register of Historic Properties (NR) that might be affected by response to a release or spill;
- unsurveyed areas where there is a high potential for the presence of historic properties and cultural resources;
- geographic areas or types of areas where historic properties and cultural resources are unlikely to be affected;
- parties that are to be notified in the event of a spill;
- who will be responsible for providing expertise on historic properties and cultural resources to the FOSCs during emergency response (i.e., the FOSC's Historic Properties Specialist); and
- developing emergency response strategies to help protect historic properties and cultural resources.

During emergency response, the PA describes:

- determination of whether categorical exclusion apply;

- activation of a historic properties and cultural resource specialist;
- identification of historic properties and cultural resources;
- assessment of potential effects of emergency response strategies on historic properties and cultural resources;
- implementation of decisions about appropriate emergency response actions; and
- determination that National PA cannot be satisfied.

The following is the emergency point of contact for initiating the consultation within Regional Response Team IV:

The RRT Guide to the Programmatic Agreement for Protection of Historical Properties can be found on the RRT IV website at:

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

4870 Disposal

See 40 CFR 230 – Guidelines for Specification of Disposal Sites for Dredged or Fill Material.

NAME	ADDRESS	PHONE NUMBER
FL Dept of State Division of Historical Resources	500 S. Bronough St Tallahassee, FL 32399	State Historical Preservation Officer (SHPO) (850) 245-6333 (24 hr)
National Parks Service	Biscayne National Park 9700 SW 328 St Homestead, FL 33033	Chief Ranger William Lopez 305-283-1952 (24 hr)

4871 Ocean Dumping

If the OSC/UC decides that either a stricken vessel or its cargo would best be disposed of at sea, after other disposal methods have been ruled as unacceptable, the RRT can assist in obtaining the appropriate permits from the EPA. 40 CFR 220.3(c) and 40 CFR 229.3 also contains guidance on emergency dumping permits.

Also see RRT4 Guidance for Ocean Dumping at:
http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

<http://www.nrt.org>

See also Section 9750.2 Guidelines for Ocean Disposal of Vessels

4880 Dredging

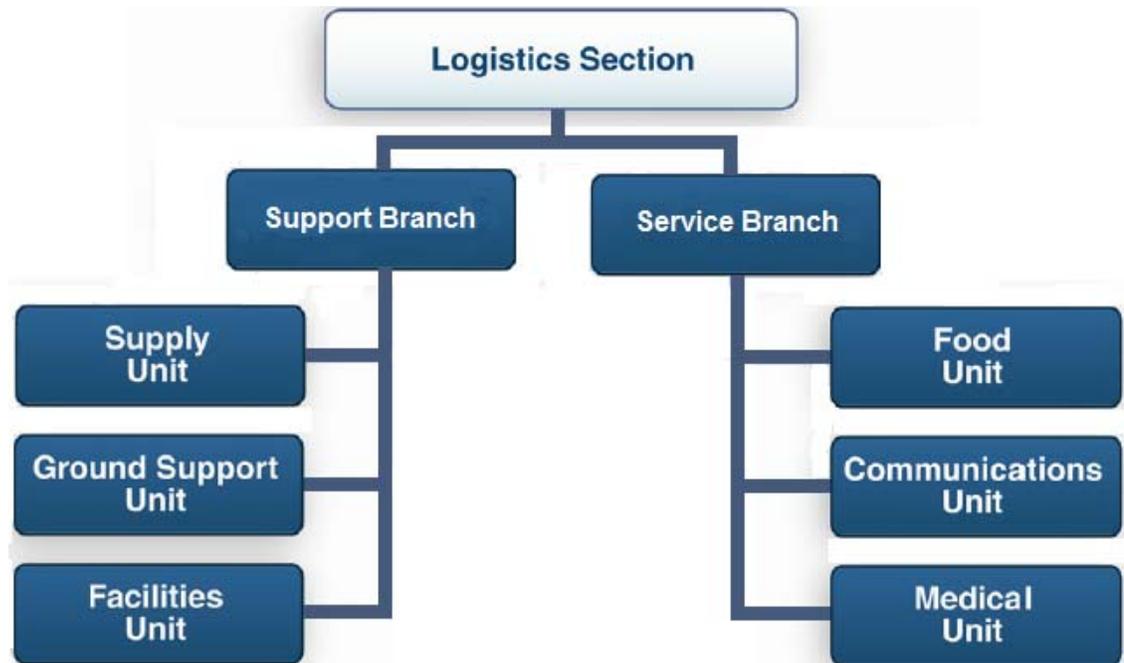
See 40 CFR 230 – Guidelines for Specification of Disposal Sites for Dredged or Fill Material.

4890 Decanting

See Section: 3250.2 Decanting Policy

4900 Reserved for Area / District

5000 LOGISTICS SECTION



This section coordinates logistics support that includes control and accountability for

Federal supplies and equipment; resource ordering; delivery of equipment, supplies, and services to the Incident Command Post and other field locations; facility location, setup, space management, building services, and general facility operations; transportation coordination and fleet management services; information and technology systems services; administrative services such as mail management and reproduction; and customer assistance. In addition, communication to the JFO may be also required during large responses to maintain overall management of critical resources to all regional command involved.

5100 Logistics Section Organization

The Logistics Section is responsible for providing facilities, all services and materials needed for the incident. The Incident Commander will determine the need to establish a

Logistics Section on the incident. This is usually determined by the size of the incident, complexity of support, and how long the incident may last. Once the IC determines that there is a need to establish a separate Logistics function, an individual will be assigned as the Logistics Section Chief.

Refer to the <http://homeport.uscg.mil/ics> for the Incident Management Handbook (IMH) and specific Job Aids and information on all Logistics Section duties and positions including ICS forms.

5200 Support

Section under development by Sector Mobile Planning Department and Area Committee:

Responsible for development and implementation of logistics plan in support of the IAP, including providing personnel, equipment, facilities, and supplies to support incident operations.

5200.1 Supply Unit

Responsible for requesting additional personnel based on Operations and Planning needs. The Supply Unit also orders equipment and supplies; receives and stores all supplies for the incident; maintains an inventory of supplies; and services all equipment. Additionally, the Supply unit is responsible for layout and activation of incident facilities. They provide sleeping and sanitation facilities for incident personnel and manage the various bases, staging areas, and camps.

5210 Summary of Suppliers

A large scale response can have significant negative impacts on the local/regional economy due to displaced workers caused from closed ports and waterways. Resource ordering should always prioritize local and near region suppliers to help reduce this potentially severe impact. Such local/near-region support could include:

- Supplemental housing, transportation and communications support providers;
- Office cleaning staff providers;
- Security staff providers;
- Vessels of Opportunity (VoOs);

The Responsible Party, OSRO and Command Logistics staff need to quickly develop resource ordering protocols for utilizing local and near regional workers to support the clean-up/recovery efforts. Ordering factors should include:

- Background Checks and drug testing protocols;
- Qualifications, experience and fitness of hired workers;
- Pre-deployment training (HAZWOPER, Safety Plan, etc.);
- Evaluation process for sufficiency of response performance for retention. (The ICS 225-CG Form should be referenced when developing the evaluation process);
- Training of non-specific tasking (disposal activities, shuttling, etc.);
- Own-supplied and Command Organization supplied safety equipment;
- Worker's Compensation liability;
- "Badging" for authentication of worker identity; and
- Monitoring process of workers for increase/decrease of work/rest periods due to hardship of work and heat stress.

5210.1 Oil Response Equipment

See Section 9240.1 Clean-up Companies.

See also: Environmental Yellow Pages

5210.2 Hazardous Substance Response Equipment

See Section 9240.1 Clean-up Companies.

See also: Environmental Yellow Pages

5220 Facilities

The Facilities Unit Leader is primarily responsible for the layout and activation of incident facilities (e.g., Base, Camp(s), and Incident Command Post(s)). The Facilities Unit Provides sleeping and sanitation facilities for incident personnel and manages base and camp operations. Each facility (base or camp) is assigned a manager who reports to the Facilities Unit Leader and is responsible for managing the operations of the facility. The basic functions or activities of the Base or Camp Manager are to oversee all of the primary services and support activities that take place at the Base, including security services and general maintenance. The Facility Unit Leader reports to the Support Branch Director.

Section under further development by Sector Mobile Planning Department and Area Committee. **Please refer to section 9000 for facility contact information.**

5220.1 Command Post

An incident command post will initially be established at either Sector Mobile or DDO Panama City. The responsible party is invited to combine his command post at these locations to institute a unified command at the earliest opportunity. This will allow the responsible party time to locate and organize an incident command post. The actual location of the spill may determine whether the Sector or the DDO will take the lead in formulating a response to a spill and where the command post will be located. In addition to an incident command post, field command posts can be established to supervise response efforts. Field command posts should be close to the spill site or work area to monitor and supervise the cleanup.

5220.2 Command Post Establishment Procedures

General - Several basic features must be considered when selecting potential incident command post sites. These considerations include:

Location - The incident command post should be in the general area of the incident. It does not need to be at the incident site and for many reasons should be located away from the incident, including preventing the administrative activities surrounding a spill from interfering with operations. Above ground facilities may enhance radio communications and antenna placement.

Size - The command post must be capable of accommodating the number of people anticipated. For major incidents the number of people can easily reach 200. An estimated need of 50-sq. ft./person results in a requirement for about 10,000 sq. ft. Additional support area for food service, etc. should be considered.

Layout - The command post should be compatible with the NIIMS organization. Individual spaces for the following are desirable:

- Unified Commander Private Rooms
- Unified Command Center
- Planning Section
- Logistics Section
- Operations Section
- Finance Section
- Public Affairs (should be separated from the above)
- Meeting Room (should be separated from the above)

Parking - Parking for the above 200 personnel plus visitors and command vehicles should be present. For planning purposes a minimum of 300 parking spaces should be available.

Electricity - Power demands at command posts are heavy. Computers, cell phones, and radios are becoming standard equipment for responders. Each person in the command post will likely have need for at least one outlet, or a total of 200 outlets. Power strips can decrease the number of building outlets provided the electrical supply is adequate for the load. Estimated power load may exceed 400 amps.

Telephones - Telephones are critical. For planning purposes one phone line for every two people in the command post is used, or 100 lines. Some of these phones should be designated "incoming only".

Air Operations - Air overflights will be a normal part of the incident response daily routine. Helicopter landing areas should be in close proximity to the command post. This will reduce staff and unified commanders' travel time to and from overflights.

Security - A security control station will be needed, along with sufficient security personnel to control access to the command center and associated peripheral equipment/facilities.

Sanitary Facilities - Provisions should be made to accommodate large numbers of people on site around the clock.

5220.3 Field Command Post Establishing and Potential Sites

Refer to the Geographic Response Plan online at:

ocean.floridamarine.org/acp/mobacp/

Establishing:

1. Contact owner of property.
2. Arrange for utility activation:
 - a. Electric
 - b. Telephone
3. Anticipate period before utility activation with portable generators, cellular telephones, and VHF radios.
4. Have command post delivered.
5. Items that should be considered when choosing a field command post site:
 - a. Hard surface road with adequate parking
 - b. Helicopter landing area
 - c. Accessibility to the waterway
 - d. Proximity to the actual incident

For field command posts, either modular buildings (portable) or motor homes (RV) can be used. Many of the cleanup contractors, major oil companies, and response agencies have ready response mobile command posts available. One advantage of motor homes is they allow the command post to be easily moved as the oil spill response changes.

5220.5 Staging Areas

Refer to the Geographic Response Plan online at:

ocean.floridamarine.org/acp/mobacp/ or Sector Mobile Homeport website
<https://homeport.uscg.mil/>

5300 Services

Refer to the Geographic Response Plan online at:

ocean.floridamarine.org/acp/mobacp/ or Sector Mobile Homeport website
<https://homeport.uscg.mil/>

Sector Mobile Planning Department is currently updating all contact information.

5400 Communications

The Communications Unit Leader, under the direction of the Service Branch Director or Logistics Section Chief is responsible for developing plans for the effective use of incident communications equipment and facilities, installing and testing of communications equipment, supervision of the incident Communications

Center, distribution of communications equipment to incident personnel, and the maintenance and repair of communications equipment.

5410 Coast Guard Communications Capabilities

Sector Mobile Command Center maintains VHF Radios that can be activated for an incident. Sector Mobile is also equipped with Satellite phones that can also be activated if needed. Contact Sector Planning Department for more information at 251-441-6522.

5410.1 Gulf Strike Team Command Trailer

The Gulf Strike Team has a Communication/Mobile Command Post trailer with various VHF and UHF radio and multiple telephone lines. This resource may be requested by contacting (251) 441-6601.

5410.2 Communication Frequencies

<u>Channel</u>	<u>Frequency</u>	<u>Use</u>	<u>Remarks</u>
6	156.3	Ship-to-Ship Safety	Use for Ship-to-Ship safety and Search and Rescue
12	156.6	Vessel Traffic Service (VTS)	Not currently in use.
13	156.65	Bridge to Bridge	Message must be about ship navigation
16	156.8	International Distress, Safety, and Calling	Only for hailing, distress, and Search and Rescue
21A	157.5	U. S. Coast Guard Only	
22A	157.1	USCG Liaison & Maritime	Use this Channel to talk to Coast Guard and public
CG1 CG111	CG1 CG112	CG1 CG113	CG1 CG114
23A	157.15	U. S. Coast Guard Only	Working Frequency
81A	157.075	SECTOR Houston-Galveston, MSU Galveston	Not currently in use.
83A	157.175	SECTOR Houston-Galveston, MSU Galveston	Not currently in use.

• Figure 1 - USCG Monitored Frequencies

5410.3
FM High Sites

Coast Guard VHF-

Contact Sector Mobile Command Center at 251-441-6211.

6000 FINANCE / ADMINISTRATION SECTION

The Finance/Administration Section is responsible for all incident costs and financial considerations. This includes the Time Unit, Procurement Unit, Compensation/Claims

Unit and Cost Unit. The IC will determine the need for a Finance/Administration Section, and designate an individual to perform that role. The Finance/Administration Section is generally set up for any incident that may require on-site financial management. In general, the decision to establish a finance / administration section will depend on two factors:

- (1) the financial complexity of the response; and
- (2) the number of tactical assets deployed (usually measured by the number of tactical divisions/groups established or likely to be established).

If no Finance Section is established, the individual members of the Unified Command will perform finance functions for their agency/organization component.

6010 Key Unified Command Financial Decisions

As discussed in Section 1000 of this plan, the National Response System places responsibilities for conducting clean up on the responsible party as a matter of policy. In practices, however, the involvement of the state, local, and federal agencies in various phases of the response are significantly more involved. The National Pollution Fund Center (NPFC) refers to the National Contingency Plan's four phases of a response:

Phase I: Discovery and Notification;

Phase II: Preliminary Assessment and Initiation of Action;

Phase III: Containment, Countermeasures, Cleanup and Disposal; and

Phase IV: Documentation and Cost Recovery.

Certain federal, state, and local government costs incurred during Phase II Assessment may be chargeable against the OSLTF, but may not all be billed against the Responsible Party during cost recovery Phase IV.

Further, Unified Command members come to the response with objectives that overlap on the subject of pollution removal but often extend beyond this matter. The Responsible Party Incident Commander (RPIC) for instance will normally have key objectives of the response directed toward repairing damage and returning a vessel or facility to operation.

In the case of an abandoned vessel, the marina or dry-dock owner will normally have objectives of having the derelict vessel removed/eliminated after the pollutant is removed. While these may at first appear to be post-response objectives, these decisions and matters deeply influence the response itself. For example, non-response derelict vessel disposal strategies will influence the

response decision on how clean the derelict hull must be rendered in order to assure it poses no additional threat to the environment.

Various financial mechanisms available to the members of the Unified Command each come with stringent limitations and intended employment. For this reason, one of the most important decisions the Unified Command must come to during the first Unified Command meeting is an agreement about how financial responsibilities will be shared. The remainder of this section details some considerations in making these decisions.

Limitations in the Employment of the OSLTF:

(1) Missions Other Than Pollution Removal. The federal, state, and local government response to an incident will typically include search and rescue, law enforcement, safety of navigation (including placing Aids to Navigation and salvage of sunken vessels), port safety, and maritime homeland security. However, only those actions whose primary purpose is removal (i.e., the containment or removal of oil pollution or necessary to minimize or mitigate oil pollution damage to the public health, welfare, or environment) and which are consistent with the National Contingency Plan may be paid or reimbursed by the OSLTF. *The first key financial decision of the Unified Command is how other mission objectives will be funded, followed through by funding instructions to the Finance/Administration Section.*

(2) Employment of State and Local OGAs Pollution Response Resources. From the outset of any response, the Federal On-Scene Coordinator (FOSC) should establish whether state or local resources are necessary for removal actions. The Unified Command, based on this decision, must carefully define the scope of the state or local OGA's expected actions and allow the FOSC's staff to evaluate potential claims against the OSLTF. When a state or local OGA responds under this type of agreement, the Coast Guard representatives in the Finance/Administration section must execute a Pollution Removal Funding Authorization (PRFA) with the OGA's financial representative. The PRFA assures the OGA will be reimbursed for specific work performed at the FOSC's request. *The second key financial decision of the Unified Command is which actions will be undertaken by state and local OGAs at the FOSC's request (and paid for using a PRFA), and which will be undertaken by these agencies as independent members of the Unified Command (using funding mechanisms other than the OSLTF).*

(3) Federal Vessels and Installations. The National Contingency Plan places responsibility for spills from federal vessels and installations on the owning federal agency, including use of its own funding. However, the Federal On-Scene Coordinator can use the OSLTF as a last resort to clean up or prevent oil discharges. When the responsible federal agency is capable of funding the clean up, the FOSC should attempt to establish a Military Interdepartmental Purchase Request (MIPR) or equivalent to reimburse the use of FOSC and OGA pollution response equipment and personnel time. *The third key financial decision of the Unified Command is to establish mechanisms (such as a MIPR) to finance FOSC and OGA response activities when the spill comes from a federal vessel or installation, and to determine when the last resort OSLTF access is needed.*

(4) Damage Claims and Removal Activities. Claims of damage may be submitted for reimbursement (when approved) from the OSLTF. Often, such damage claims include the costs of restoring a vessel, facility, etc., to operation (as in the case of a third-party vessel which is oil contaminated as a result of the spill). Actual decontamination of a vessel, facility, or other installation may also reasonably be a removal action (i.e., to prevent further human health, economic or environmental damage), and the question of overlaps between damage claims and removal

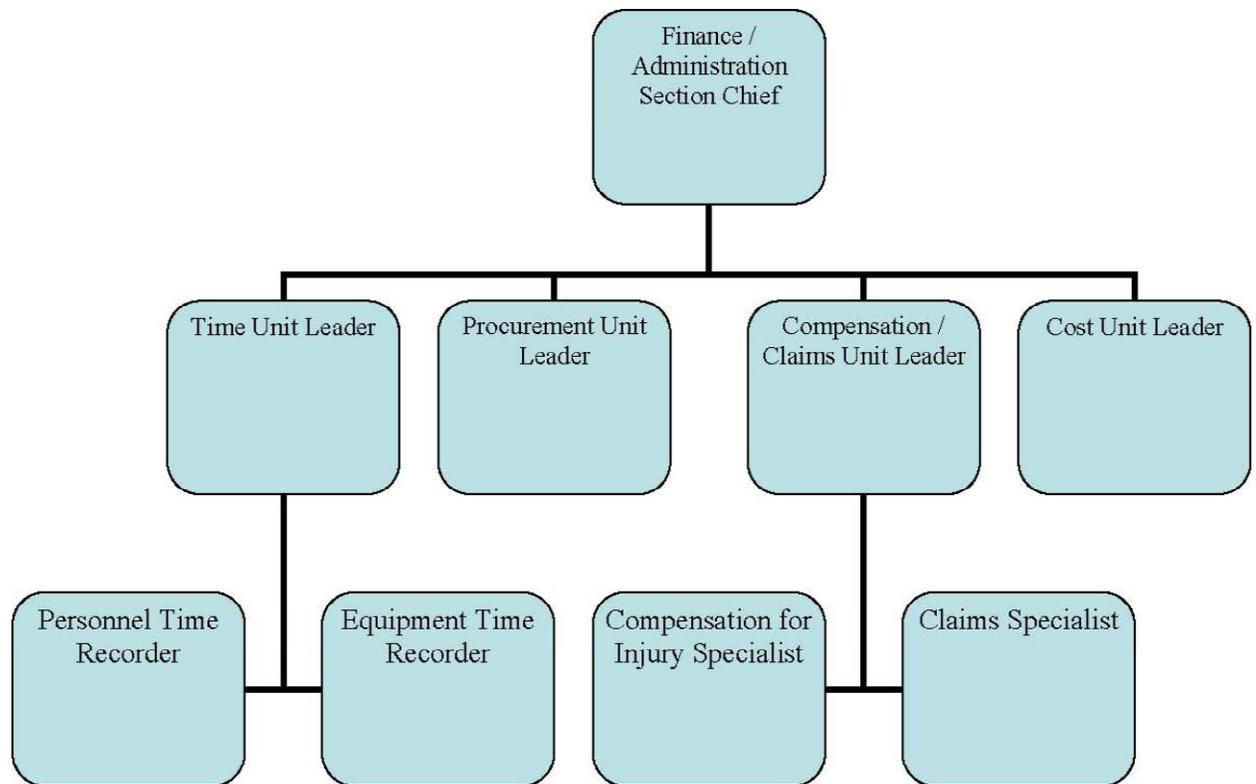
actions arises. Rather than simply a question of funding mechanisms, these questions impinge directly on which clean-up strategies and objectives the Unified Command will execute, particularly during the later stages of the response. *The fourth key financial decision of the Unified Command is to establish how removal strategies and actions will impact damage claims and establish a single, uniform policy for handling these overlaps, usually in consultation with the National Pollution Fund Center's case manager.*

(5) Replenishment of Response Equipment to Inventory. The OSLTF may be used to restore pollution response equipment to inventory in the condition it was in before the response. Items used up in the response (consumables) or damaged beyond economical repair may be replaced. *The fifth key financial decision the Unified Command faces is how equipment will be evaluated at the start of the response, and how the condition will be assessed during demobilization for replenishment/repair purposes, along with the financial arrangements for accomplishing the replenishment. Again, this replenishment decision can extend only to response equipment used for oil pollution removal, not toward other objectives.*

(6) Discharges causing Underground Contamination. Discharges from oil tanks and related facilities often cause extensive subsurface or groundwater contamination. When underground contamination has migrated so as to cause an actual surface discharge or substantial threat of a discharge into navigable waters, the OSLTF may be used for removal. When these imminent threat or actual discharge conditions are not met, the incident is considered a hazardous materials incident ashore under municipal, county, and state hazardous material discharge rules. *The sixth key financial decision is how various aspects of a response causing underground contamination will be treated (i.e., threat to the navigable waters or not), and consequently how the response will be funded.*

(7) Preferred or prioritized Sources of Supply. Many if not all of the agencies and organizations responding to a spill will have pre-arranged sources of supply and service, and all will have legal and procedural limitations on procurements. While the emergency elements of the response may expedite procurements, it does not eliminate the rules governing procurement. Accordingly, the seventh key financial decision is to sort out procurement and contract responsibilities between the agencies/organizations in the Unified Command based upon preferences and prioritization of sources of supply.

(8) Limits of Liability. In a large response, there is significant possibility that the Responsible Party's limits of financial responsibility will be exceeded, opening the possibility that the response may transition entirely to FOSC / SOSC control. *The eighth key financial decision is to agree upon an appropriate means of tracking the Responsible Party's financial commitment, an approach to these limits, and process for deciding when and how any transition in the Unified Command will occur.*



6110 Finance/Administration Section Chief

The Finance and Administration Section Chief is responsible for all financial and cost analysis aspects of the incident and for supervising members of this Section.

Implement and manage the Finance Section branches and units needed to proactively accomplish Finance Section actions.

Provide, manage, coordinate, document, and account for access to response funding sources, including the Oil Spill Liability Trust Fund (OSLTF), Natural Resources

Damage Assessment Fund (NRDA), State funding sources, and other sources of response funding.

Coordinate and ensure the proper completion of response cost accounting documentation

Coordinate and manage response ceilings, budgets and cost estimates.

Provide financial support for contracting services, purchases, and payments.

Serve as the primary contact to the National Pollution Fund Center (NPFC) and the NPFC Case Officer to coordinate response cost recovery actions.

Identify additional financial services resources or logistics support needed.

Report on the status of Finance Section services.

See the Incident Management Handbook COMDTPUB P3120.17 and **Finance and**

Administration Section Chief Job Aid located at (<https://homeport.uscg.mil/ics>) for duties and responsibilities.

6120 Modular Development of the Finance/Administration Section

Larger incidents typically require a Finance/Administration Section to monitor costs. When the incident clearly will require involved financial arrangements, particularly when damage claims will likely be involved, the Unified Command is well advised to establish a Finance / Administration Section within the first operational period so that out-of-area financial experts can mobilize to staff the section.

Smaller incidents may also require certain Finance/Administration functions. For example, the IC may establish one or more units of the Finance/Administration Section for such things as procuring special equipment, contracting with a vendor, or for making cost estimates of alternative strategies. It is critical to note that even where no Finance / Administration Section or units are established, all of the Sections FUNCTIONS are performed by other personnel at the site (e.g., during a small response, all Section functions will typically be performed by the

Federal On-Scene Coordinator's Representative at the same time that he/she is overseeing the clean-up operation, future operational period planning, response equipment and personnel logistics, liaison functions, and command objectives function.

In any but the smallest of responses, the subject-matter span of control will rapidly be exceeded.

A typical modular progression for a Finance / Administration Section during a response includes:

Initial Response Organization: The initial response to an oil spill is typically investigatory and tactical; no dedicated finance / administration section personnel will deploy. Finance / Administration functions will be performed as needed by the initial responders, but these functions typically do not arise immediately.

Reinforced Response Organization: The reinforced response to an oil spill also typically does not include dedicated finance / administration units; the majority of responses play out entirely at this level with the reinforcing response assets handling the response within the first operational period. Indications from the scene that the incident is escalating will typically require the deployment of dedicated Section personnel.

Multi-Division/Group Response Organization: A multi-division response organization indicates that the incident is sufficiently large and complex as to require a finance / administration section on-scene. Because this level of response typically involves the sustainment of reinforced response personnel and equipment on-scene (rather than the mobilization of large number of extra resources), the multi-division / group organization typically requires a procurement unit and a time unit.

Multi-Branch Response Organization: A multi-branch organization clearly indicates the need for the entire Finance / Administration Section, with Time, Procurement, Claims & Compensation, and Costs Units. See IMH Common Practices.

6130 Degree of Integration

In general, sections are integrated under a unified command to varying degrees depending upon the nature of the work and restrictions on standard operating procedure. The Planning Section, for instance, is highly integrated with “agency stovepipes” completely eliminated. At the other end of the spectrum, the Finance / Administration Section deals with employees, equipment, procurements, and contracts completely bound by differing agency policy and legal requirements. In most instances these differing agency requirements cannot easily be resolved, and the Section normally operates almost as a grouping of agency “stove-pipes” within each Unit, integrated into a coherent whole by the Unit Leaders and Section Chief.

The decision of the Unified Command with regard to the assignment of personnel to each section should be made based upon the level of involvement an agency has in procurement, cost documentation, etc., and the degree to which agency financial and administrative Standard Operating Procedure differ. Where the Coast Guard Captain of the Port is the FOSC, for instance, all Coast Guard operational forces and federal procurements will occur within the military Coast Guard framework (including fatigue standards, cost documentation, federal contract processes, etc.). These procedures differ significantly from a civilian corporate or local governmental agency’s procedures, but do not differ significantly from other military and federal agencies (such as the U.S. Navy, Marine Corps, or National Aeronautical and Space Administration). Assuming they are making significant procurement, time and equipment contributions, local government and civilian corporate organizations would likely need representation within the Finance and Administration Section (loose integration), but the federal agencies might fully integrate by delegating their financial management to the Coast Guard representatives in the Section.

6200 Fund Access

Refer to the “U. S. Coast Guard Federal On Scene Coordinator’s (FOSC) Finance and Resource Management Field Guide” for requirements and policies concerning contracting and financial management of oil and hazardous substance response activities.

<http://www.uscg.mil/hq/npfc/npfc.htm>

The **National Pollution Funds Center User Reference Guide** (July 2007) is designed to be a Federal on-scene coordinator reference tool during an oil or hazardous materials spill incident.

The Technical Operating Procedures (TOPS) serve as Coast Guard Guidance for various fund users. They provide formatting, forms and instructions for compiling and submitting documentation efficiently and effectively. The TOPS below are excerpted in total from the NPFC User Reference Guide.

Determining Removal Cost under the Oil Pollution Act of 1990. **Technical Operating Procedures for Determining Removal Costs Under the Oil Pollution Act of 1990** (June 1999)

Removal Cost Policy and Operating Procedures (CERCLA) (May 1996)

Technical Operating Procedures for Resource Documentation Under the Oil Pollution Act of 1990 (June 1999)

Technical Operating Procedures for Designation of Source Under the Oil Pollution Act of 1990

6210 OSC Access

Should it become necessary, the FOSC may access the OSLTF or CERCLA funds by obtaining a Federal Project Number (FPN) or CERCLA Project Number (CPN) and ceiling from the Coast Guard's CANAPS funding system. CANAPs will automatically confirm the issuance of the FPN or CPN by message.

The OSLTF applies to funding responses only when the following two conditions are both met:

(1) There is a discharge of oil (as defined in 33 USC Section 2701(23)), or a substantial threat of a discharge of oil:

- (a) Into the navigable waters;
- (b) On the adjoining shorelines;
- (c) Into the waters of the exclusive economic zone; or
- (d) That may affect natural resources under exclusive management authority of the United States.

(2) There are further actions necessary to ensure effective and immediate removal, mitigation or prevention of the substantial threat. The OSLTF has \$50 Million in the Emergency Fund sub-fund available for funding emergency removal of oil, and a maximum of \$500 Million per case to remediate natural resource damages. A maximum of \$1 Billion is available per case to pay for costs and damages associated with an oil spill.

The CERCLA funding for responses generally applies when the following three conditions are all met:

(1) A hazardous substance (not oil under 33 USC 2701(33)) has been released, or there is substantial probability that it will be released;

(2) The release (or probable release) presents an imminent and substantial threat to the public health or welfare; and

(3) The Responsible Party (RP) is failing to take appropriate actions or it is necessary to monitor the actions of the RP to assure they are taking appropriate actions.

The CERCLA removal funding is limited to no more than \$2 Million dollars or 12 months in duration, though the Environmental Protection Agency may grant waivers to this requirement. The FOSC can obligate no more than \$250,000 per incident without an approved Action Memorandum.

There is no CERCLA funding for compensation payments to claimants damaged by hazardous substances.

Should a FPN or CPN that has been obtained prove unnecessary (no funds expended), the OSC must inform D7(m) of this fact so they can deactivate the FPN. During a spill the Coast Guard will monitor the activities of all contractors hired by the FOSC as well as document its own costs. Other agencies will document their costs on the appropriate forms. At the end of the response all documentation will be submitted to the OSC for verification and forwarding to the NPFC.

More information can be found at:

Chapter Three Removal Actions Oil and Hazardous Substances (NPFC User Reference Guide).

6220 State Access

The Governor your perspective state has designated a representative for state access to the Fund. The Governor's letter designates the Chief, Office of Coastal Protection to make request pursuant to Section 133.25 of OPA 90.

State access to OSLTF and CERCLA funds provides an avenue for states to receive Federal funds for immediate removal costs resulting from their response to actual or threatened discharges of oil. State access does not supersede or preclude the use of other existing Federal payment regimes. The State should not seek and will not receive payments for the same costs from more than one payment regime. States may access funds via one of three methods:

- (1) File a claim with the NPFC within 6 years of the cleanup.
- (2) Ask the FOSC to obtain a FPN/CPN and a ceiling amount for the State. The State will work directly with the NPFC to document costs.
- (3) Have the FOSC obtain a FPN/CPN and then issue a Pollution Removal Funding Authorization (PFRA) to the State with a ceiling and time limit. The FOSC will then review all documentation prior to submission to the NPFC.

The Technical Operating Procedures (TOPS) serve as Coast Guard Guidance for various fund users. They provide formatting, forms and instructions for compiling and submitting documentation efficiently and effectively. A copy of the "Technical Operating Procedures for

State Access to the Fund" can be obtained at:

<http://www.uscg.mil/hq/npfc/urg/index.htm>

State Access under the Oil Pollution Act of 1990:

State Access NPFC User Reference Guide (Chapter 5)

State Access regulations (33CFR 133):

6230 Trustee Access

Administrative Trustees are organizations with responsibilities for specific areas or natural resources such as the Department of the Interior. OPA 90 authorizes these organizations access to the fund through one administrative trustee known as the Lead Administrative Trustee (which must be a federal agency.) The designation of Lead Administrative Trustee is made for each spill based on the involvement of each organization. Administrative trustee access to the emergency fund would most likely be limited to beginning the damage assessment process.

The Lead Administrative Trustee may request funding directly from the NPFC case officer for the purpose of initiating damage assessments. The NPFC case officer will inform the FOSC that funds have been requested by the Lead Administrative Trustee.

ROLE OF TRUSTEES IN THE FUNDING PROCESS

Trustees must coordinate with each other during all phases of NRDA to ensure no double recovery of damages.

In the pre-assessment phase of a NRDA, all affected trustees must select a Federal Lead Administrative Trustee (FLAT), who is then responsible for coordinating the effort and submitting necessary paperwork to NPFC.

Trustees assess damages for “injury to, destruction of, loss of, or loss of use of” natural resources.

Trustees develop restoration alternatives to address any injury to natural resources, from which they select the most appropriate alternative to implement.

Trustees must also coordinate with the FOSC during the NRDA process to avoid interference with the ongoing response.

6240 Stafford Act Funding

Under the Stafford Act, when there is a Presidential declaration of an major disaster or emergency, the Coast Guard FOSC may receive direct tasking in the form of a Mission Assignment – a work order issued by the Federal Emergency Management Agency (or other designated agency) directing the recipient agency to complete a specified task.

Emergency Support Function 10 (ESF-10) – Hazardous Materials Response Annex of the Federal Response Plan – includes both Oil and Hazardous Materials response activities.

In the execution of a mission assignment, the FOSC will use existing funds, resources, and contracts for goods and services to complete the task. The FOSC will then review the actual expenses against the estimated costs and make payments to OGA and private vendors for each cost.

For oil spills and hazardous materials releases, the FOSC will receive a Request for Federal Assistance from IAG, FEMA or the ESF lead agency, including a cost ceiling, and will then proceed to respond as normal using the OSLTF and CERCLA funds,

(Reference Section 6270 for FEMA funded ESF #10 responses, including the Request for Federal Assistance form in the cost documentation. It is important to recognize that Stafford Act funds, like OSLTF and CERCLA funds, may only be applied to response costs directly related to the tasking, and the Stafford Act ceiling must be managed carefully just as other fund ceilings are managed.

Stafford Act Funding References

Commander, Coast Guard Atlantic Area Message 282118Z MAY 03

National Response Plan

Homeland Security Presidential Directive 5 (HSPD-5)

DOT Order 1100.29G Regional Emergency Transportation Coordinators or Representatives

National Oil and Hazardous Substance Spill Contingency Plan (NCP)

FEMA/EPA Memorandum of Agreement: Policy Guidance on ESF-10 Mission Assignments

COMDTINST 16451.1 Disaster Related Pollution Response Activities Under The National Response Framework and Cost Reimbursement From The Stafford Act

D-7(m) Policy Letter Guidance for Disaster Response Under the National Response Framework (NRF) in Support of Emergency Support Function ESF#10

6241 National Response Framework Key Concepts

Emergency support functions (ESF). The NRF groups disaster response actions into 15 functional areas known as ESFs and assigns a federal agency to chair each ESF and administer its response actions. While it is possible for USCG units to provide support under any of the ESFs, the two most likely ESFs for response and possible chair/vicechair responsibilities are ESF-1 (transportation) and ESF-10 (hazardous materials). The USCG's role and responsibilities for ESF-10 include all of those contained in the National Contingency Plan (reference e) as well as releases of hazardous materials beyond those covered under the NCP (e.g., household hazardous waste cleanup). The NCP is incorporated in its entirety into the NRF under ESF-10.

Mission assignments.

(1) The administrative vehicle by which FEMA tasks a federal agency to respond is known as a mission assignment. The mission assignment is a task-specific work order identifying response operations to be executed under an assigned ESF. The primary response agency may enlist the assistance of other federal agencies by issuing an interagency agreement (IAG). Federal agencies must use their own funds in the execution of a mission assignment or IAG then seek reimbursement from FEMA. It is imperative that USCG units and other agencies operating at the request of the FOSC receive a mission assignment or IAG for any FEMA (or primary agency) tasking as FEMA will not reimburse for emergency services rendered if a mission assignment or IAG does not specify those services. However, response units should not delay responses that fall under existing statutory authorities/responsibilities waiting for a mission assignment or IAG. The FOSC should direct the response and allow higher authority to work out the funding.

(2) Reference f provides a listing of some of the tasks for which ESF-10 mission assignments can be expected. EPA and USCG personnel continue to work with FEMA to identify common ESF -10 tasks and to pre-script mission assignments for these common tasks in order to speed the process.

(3) FEMA may assign a limited number of pre-Stafford Act declaration mission assignments in order to stage federal and FOSC-requested response assets for events related to forecasted disasters such as hurricanes. In the past, the USCG has prestaged personnel via these pre-declaration mission assignments. The process is slightly more involved, emphasizing the need for close coordination between district staffs, area, NPF, FEMA and EPA prior to a disaster response.

Regional Response Coordination Center (RRCC).

Upon a Stafford Act declaration, FEMA activates the appropriate RRCC. The RRCC coordinates federal response efforts until a Joint Field Office (JFO), staffed by an Emergency Response Team (ERT), is established in the field and the FEMA Federal Coordinating officer (FCO) assumes coordination responsibility (note: there is generally one JFO per impacted state). The FCO has the legal authority to assign missions to federal agencies. The RRCC generally operates from the FEM regional office for the affected area. Primary functions of the RRCC include: communicating with the impacted state(s); coordinating deployment of the ERT-A (emergency response team – advance element) to field locations; assessing damage information; and developing initial mission assignments.

USCG/FOSC staffing support for the RRCC.

If the disaster impacts the coastal zone, the USCG will normally provide one person knowledgeable in USCG / Area Contingency Plan response capabilities to the RRCC to ensure the interests and capabilities of the USCG are recognized at the outset of response operations and to coordinate the initial issuance of mission assignments/IAGs. Typically, the Eighth Coast Guard District office will provide this person. The individual assigned must have sufficient experience and maturity to work with mid-to-upper level management personnel from other agencies and to operate under stressful conditions for long hours. Districts normally ensure personnel are rotated every two-to-three weeks to avoid response fatigue.

State Emergency Operations Center (EOC).

During a disaster response each state will activate an EOC to coordinate state response efforts and requests for federal assistance.

USCG/FOSC staffing support for an EOC. The Eighth Coast Guard District will normally provide a senior officer as an Emergency Preparedness Liaison Officer (EPLO) to each activated EOC. The EPLO advises the state on USCG / FOSC response capabilities, identifies to the state response requirements appropriate for USCG / FOSC intervention, assists the state in requesting federal assistance via the RRCC or JFO and keeps the district informed of pending request, capability requirements, etc. It should be emphasized that the EPLO's role is not a "fishing" expedition to look for work for the FOSC, but as a technical advisor informing the state on USCG / FOSC capabilities/existing responsibilities and processes for obtaining USCG / FOSC assistance.

Emergency response team (ERT). The ERT is the multi-agency response staff that includes the regional chair and support staff for each activated ESF. The ERT is located in the JFO. For incidents that impact just the coastal zone and require ESF-10, the USCG will be the regional ESF-10 incident chair with EPA as the vice-chair. For incidents that impact both the inland and coastal zones and require ESF-10, EPA will be the regional ESF-10 chair and the USCG the vice-chair. The USCG does not staff ESF-10 for incidents that do not impact the coastal zone.

(1) USCG / FOSC staffing of the ERT. In accordance with the FRP, the Coast Guard

Eighth District fills the USCG role as ESF-10 chair/vice-chair. As it is unlikely that a district division chief would be able to leave the district office during a major disaster response, he/she has designated a senior member of his/her staff to perform this function. The ESF-10 chair/vice chair will be supported by USCG and EPA personnel/watchstanders.

(2) Emergency response team - advance element. Prior to the establishment of the JFO and the ERT, an ERT-A is deployed to each impacted state. The ERT-A is the initial federal interagency group to respond to an incident in the field. The ERT-A normally deploys to the state emergency operations center (EOC) to obtain and evaluate disaster-related information, identify specific state requirements for federal response assistance and establish a location for the JFO. Typically, the JFO will be located as close to the impacted area as possible as designated by the FCO. Once the DFO is ready, the ERT-A folds into the ERT and helps to staff the JFO. USCG / FOSC participation on the ERT-A is critical for identifying tasks appropriate for the USCG / FOSC, aligning response operations with issued mission assignments and providing a conduit to USCG / FOSC resources. As with the EPLO, USCG personnel assigned to an ERT-A are not looking for work, but ensuring that support requested by the state is tasked appropriately.

USCG/FOSC staffing support to the ERT-A. For incidents requiring ESF-10 support that impact the coastal zone, at least two USCG watchstanders will be assigned to each ERT-A to support 24/7 operations. The Eighth Coast Guard District will coordinate USCG watchstanders. Watchstanders must be able to speak with authority on behalf of the USCG and FOSC(s) and have sufficient experience and maturity to interact with senior members of federal, state, or local agencies.

6250 Coast Guard Area Commander Support

Districts shall contact Coast Guard Atlantic Area if augmentation is required to fill ESF responsibilities. LANTAREA, with MLCA, will develop an ad hoc pool of ESF knowledgeable personnel from amongst the districts and area/MLCA staffs to fill augmentation requirements.

6251 USCG ESF Watchstander Responsibilities

The USCG ESF Watchstander on the ERT-A and ERT is responsible for coordination and flow of information between the FCO/ESF chair and district, management of ESF- 10 mission assignments, tracking ESF-10 response operations and costs in support of each mission assignment and providing subject matter expertise on USCG assets and capabilities.

Under the direction of the ESF-10 chair/vice-chair, the ESF-10 Watchstander shall:

Serve as the USCG ESF-10 representative in the JFO.

Coordinate information management for all Coast Guard ESF-10 activities.

Coordinate emergency response activities with:

The affected district.

USCG EPLO at the EOC (if assigned).

The EPA ESF-10 Watchstanders.

Other federal agency counterparts within the ERT-A/ERT.

Federal agencies having control of supporting resources within the NRF response infrastructure.

Outside departments and agencies supporting ESF activities.

Provide the principal USCG representation and liaison for ESF-10 activities with the FCO and the ESF-10 chair.

Provide daily reports to the USCG ESF-10 chair/vice-chair, and the district(s) for the impacted area.

Provide timely reports to other ESF counterparts within the ERT-A/ERT.

Attend annual training focusing on the NRF and the activation/role of ESFs. Training should include joint formal instruction with FEMA and EPA as well as practical exercises.

Have an operational understanding of response actions under this plan and national level contingency plans. Be cognizant of the function and responsibility of the regional response team mandate to support ESF activities.

Provide the necessary forum for the free exchange of information, consistent with statutes, regulations, and other directives between the district, other regional emergency response coordinators, and other support agencies regarding their emergency preparedness functions.

Facilitate with ESF counterparts the passing of mission assignments and IAGs, in support of FOSC response actions, to the cognizant district for processing/follow-on tasking to the appropriate field units.

6260 Communications

Normally the district serves as the primary hub for operational information between the ERT, the regional response team field units, the National Pollution Fund Center (NPFC) and LANTAREA. The USCG ESF Watchstander shall ensure the affected district receives up-to-date information on mission assignments. The district in turn shall task the appropriate field units to accomplish the mission and ensure that the ESF Watchstander receives up-to-date information on the status of all ESF related responses.

The district will include in the daily Situation Report (SITREP) to LANTAREA any ESF actions undertaken by USCG units, with copy to NPFC. SITREPS, executive summaries, website/internet conduits, and other means of communication shall be shared between the ERT-A/JFO Watchstander(s) and the district routinely during deployment to facilitate informational needs. For incidents impacting a limited geographic area, the district may consider giving the ESF-10 staff liaison directly with FOSCs/incident commanders.

6270 Funding Processes for ESF-10

The following funding processes for ESF-10 modify those described in section 6240, reference G. Mission assignments or IAGs, are faxed to the district by either the ESF-10 Watchstander or EPA. The district then operationally approves the mission assignment or IAG and faxes it to the National Pollution Funds Center (NPFC) noting the applicable mission assignment number and total funding authorized. The NPFC signs the mission assignment or IAG and issues an accounting message with a Disaster Project Number (DPN) to the district. The districts and subordinate units then use the DPN as they would a Federal Pollution Number (FPN) used for oil spills for all operations/costs associated with the applicable mission assignment or IAG. However, unlike CERCLA and the

OSLTF, the Stafford Act only pays for direct/actual costs and not the USCG standard rates used for pollution cases.

6300 Cost Unit

The Cost Unit is responsible for collecting all cost data, performing cost effectiveness analyses, and providing cost estimates and cost saving recommendations for the incident. To be successful, the Cost Unit must work closely with the Procurement Unit, and the Time Unit.

Cost Unit Leader (COST) responsibilities:

Ensure that personnel and equipment that will receive payment are properly identified

Work with the Time and Procurement Units to get all cost data

Conduct an analysis of costs and prepare estimates of incident costs

Maintain accurate information on the actual cost of all assigned resources

Identify and distribute the appropriate cost documentation forms

Monitor direct costs and anticipated costs and track the obligations against various ceilings on a daily basis

Add obligations from all sources (contractor, government, etc.) against each fund ceiling

Maintain a Unit Log ICS 214-CG

Cost Documentation and Recovery Procedures, Forms and Completion Report

There are three primary aspects to successful cost recovery and documentation of significant pollution events: rapid start; dedicated personnel; and correct forms and submission procedures.

The requirement for a rapid start to documentation will be apparent upon examining the necessary forms and procedures. Whenever this plan is activated (i.e., the response exceeds the vessel or facility response plan, the state or federal government take an interest, or when there is no responsible party taking action), the following procedures must be executed by the Cost Unit:

(1) Determine whether OSLTF funding applies. Based upon Unified Command decisions on response action funding, determine whether other sources of funding apply.

(2) Estimate the OSLTF and other funding ceilings required. In many responses, both an OSLTF and CERCLA ceiling will be established, with various response costs charged against one fund or the other depending on the decisions of the Unified Command and the limitations of the two funds. Similarly, other funds (such as for Search and Rescue, vessel salvage, and so on) may also be established, each with its own independent ceiling.

(3) Obtain a Federal Project Number (FPN) for the OSLTF fund, a CERCLA Project Number (CPN) for the CERCLA Fund, and authorized ceilings for each all identified funds. The Ceiling And Number Assignment Processing System (CANAPS) issues Federal and CERCLA

project numbers and authorized ceiling limits for funding certain removal actions associated with oil and hazardous waste spills. For specific guidance on the obtaining of FPNs and CPNs, see

CANAPS website at <http://www.uscg.mil/npfc/Response/CANAPS/default.asp>.

(4) If any fund advice is needed, contact the National Pollution Fund Center Regional Case Manager at (202) 493-6723. If the regional manager is not available, the NPFC duty officer can be paged by calling (800) 759-7243, PIN 2073906, or by calling the National Response Center at 800-424-8802.

(5) Obtain copies of PRFAs and Authorizations to proceed from the Procurement Unit.

(6) Identify and distribute the appropriate cost documentation forms.

(7) Monitor contractors for all agencies on a daily basis. Collect both receipts and Daily Resource Reports (form CG-5136 series) from the Time Unit.

(8) Monitor U.S. Coast Guard and other Unified Command operational forces on a daily basis. Collect copies of aircraft use logs and vessel operating/navigation logs in addition to Daily Resource Reports (form CG-5136 series) from the Time Unit.

(9) Monitor OGA operational forces on a daily basis. Collect SF-1080 or SF-1081 vouchers and supporting OGA documentation. Normally, the type of required documentation will be detailed in the PRFA for the OGA response contribution from the Time Unit.

(10) Add up obligations from all three venues (contractor, unified command, and OGAs) against each fund ceiling (for this reason, it will be imperative to understand fully Unified Command decisions about which actions/contracts are directed to be made against which funding source). Include direct costs (Type I costs) and Anticipated Costs (estimates or Type II costs) and track the obligations against the various ceilings on a daily basis.

(11) Well before a ceiling is actually reached, project the "burn rate" and advise the Unified Command when a ceiling must be increased.

(12) With Unified Command approval, increase various fund ceilings.

(13) Compile and maintain daily an inventory of all equipment purchases by purchasing agency and charged fund.

(14) Maintain daily reports of costs against a ceiling as required by the NPFC (for the OSLTF ceiling) and each other fund /ceiling. Develop a daily display and post copies at each Situation Unit Display under the direction of the Situation Unit Leader and Display Processor.

(15) After the response, certify contractor invoices within the required timeframe. For NPFC/OSLTF contracts, the required timeframe is ten days. Be certain to obtain and clearly identify

the required timeframe for all other funds and track unit performance against these required cycle times. In general, certification will require acknowledgement from the Operations Section that the invoiced goods or services were received, and acknowledgement from the appropriate contracting official (depending on agency/organization) that the cost for the good or service are as per the agreement.

(16) Forward all approved contractor invoices to the appropriate agency processing center for payment, keeping copies for the Unified Command's records.

(17) Within 120 days of the end of the cleanup, complete Financial Summary reports for each and every fund/ceiling managed by the Section.

There are two principle sources of assistance in documenting costs that are available to all organizations. These are the assigned Case Officer at the National Pollution Fund Center and the District Response Advisory Team. Although these sources are available to all organizations, it may be more efficient to coordinate their assistance through Sector Mobile.

There are two alternatives for non-federal organizations concerning forms on which reimbursable costs are documented. The first alternative is the organization's documentation form that has been pre-approved by the National Pollution Fund Center. If an organization lacks a pre-approved documentation form it may use the federal. Personnel rates will be determined to the maximum extent in advance. Contractor rates for contractors with Basic Ordering Agreements are fixed by the BOA. Standard rates for Coast Guard personnel are contained in Commandant Instruction 7310.1 (series). Other agencies are encouraged to have established personnel rates that can be furnished to the OSC. For organizations and contractors not having standard rates, this fact should be made known to the OSC early in the spill so that it may be addressed.

In spills where total expenditures are expected to be less than \$50K, cost documentation may be collected by the FOOSC and forwarded to the National Pollution Funds Center at the conclusion of the spill response. In larger spill responses this information must be compiled and forwarded daily to the OSC and then the NPFC.

List of Certificate of Financial Responsibility (COFR) Forms Under Development – Sector Mobile Planning Department.

6400 Time Unit

The Time Unit is responsible for recording personnel and equipment time expenditures on the response, and in larger responses for managing the response commissary. Typical duties include:

Determine agency/organization time reporting requirements for personnel and equipment, and assure the right time-documentation is made by operational personnel according to the governing time requirements. Where the situation is unclear, federal time collection data forms shall be used.

Maintain separate logs for overtime expenditures.

Track personnel and equipment hours against fatigue limits and resource burn-rate targets;

Submit daily summarized personnel and equipment time reports to the Cost Unit in a format agreed upon as satisfying the Cost Unit's cost recovery procedures.

Establish a commissary on larger and long-term responses;

Assure records are updated and provided continuously to agency representatives for their personnel and equipment time expenditures. Provide complete time records to the agency upon demobilization of resources.

Identify, track, and raise safety-related fatigue/burn-rate overtime issues to the Finance/Administration Unit Leader.

In small responses, the time and cost units are typically combined.

6500 Compensation / Claims Unit

The Claims and Compensation Unit is responsible for the following functions:

Receive, coordinate, document, and process claims against the OSLTF, NRDA, or State funding sources.

Coordinate evaluation of personal property damage claims.

Identify additional resources and logistics support needed to process claims.

Report on the status of claims processing.

Overall management and direction of all compensation for Injury Specialists and Claims Specialist assigned to the incident

Compensation / Claims Unit Leader responsibilities:

- (1) Investigate all incident accidents (e.g. vehicle accidents)
- (2) Ensure that unit personnel working on injury compensations are coordinating closely with the Medical Unit and Safety Officer
- (3) Develop and advertise incident claim process
- (4) Maintain all files on injuries and illness associated with the incident
- (5) Maintain thorough documentation on all claims (witness statements, photos, etc.)
- (6) Report on the status of claims processing
- (7) Maintain a Unit Log, ICS-214CG

The Claims and Compensation Unit is responsible for the following functions:

Receive, coordinate, document, and process claims against the OSLTF, NRDA, or State funding sources.

Coordinate evaluation of personal property damage claims.

Identify additional resources and logistics support needed to process claims.

Report on the status of claims processing.

Overall management and direction of all compensation for Injury Specialists and Claims Specialist assigned to the incident

Compensation / Claims Unit Leader responsibilities:

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- (3) Develop and advertise incident claim process
- (4) Maintain all files on injuries and illness associated with the incident
- (5) Maintain thorough documentation on all claims (witness statements, photos, etc.)
- (6) Report on the status of claims processing
- (7) Maintain a Unit Log, ICS-214CG

For the following claims:

Natural Resource Damage Claims

Claims for Removal Costs

Claims for Property Damages

Claims for Property Damages to Boats

Claims for Lost Profits and Earning Capacity

Claims for Loss of Subsistence Use of Natural Resources

Claims for Lost Government Revenue

Claims for Increased Public Services

Go To: <http://www.uscg.mil/npfc/forms.asp>

For Forms and Documents for submitting Claims:

Claimants Guide

CG NPFC-CA1

Sample Damage Claim

OSRO FAQ's

Loss of Subsistence Use Claim Forms

NRD Funding Guidelines

RP Claim Submission Guidelines

33 CFR 136

Go to: <http://www.uscg.mil/npfc/Publications/default.asp>

6600 Procurement Unit

The Procurement Unit is responsible for the following functions:

Negotiate, coordinate, document, and manage all contracts needed to support response operations.

Manage, coordinate, document, and account for all procurement orders needed to support response operations.

Manage, coordinate, document, and account for all payments made to support response operations.

Identify additional resources and logistics support needed to accomplish contracting and procurement services.

Report on the status of contracting, procurement, and payment services.

Administer all financial matters pertaining to vendor contracts.

6610 Procurement Processes and Procedures

Should the FOSC wish to hire a contractor that has a Basic Ordering Agreement (BOA) with the Coast Guard, the contractor is issued an Authorization to Proceed. The OSC must also send a message to the Coast Guard Maintenance and Logistics Command Atlantic (MLC) within 24 hours indicating that an Authorization to Proceed has been issued.

Should the FOSC wish to hire a contractor that does not have a BOA with the Coast Guard, the FOSC must first determine that a BOA contractor is not available or is unable to perform the required tasks. D7 (m) should then be notified of the FOSC's intent to hire a non-BOA contractor. The FOSC may then issue the Authorization to Proceed and send the message as indicated above. The message should clearly indicate that a non-BOA contractor has been hired and why.

The FOSC may "hire" federal organizations by the use of a Federal Agency Pollution Removal Funding Authorization. The organization will document its costs using the Pollution Incident Daily Resource Report and bill the fund using Form SF 1080.

The FOSC may hire other governmental organizations (state and local) by the use of a Non Federal Agency Pollution Removal Funding Authorization. The organization will document its costs using the Pollution Incident Daily Resource Report or other system approved the NPFC.

Once a FPN has been obtained, all message traffic must contain the National Pollution Funds Center (NPFC), Coast Guard Finance Center and Maintenance and Logistics Command (MLC) as information addressees.

6700 Human Resources

The Human Resources Unit is primarily responsible for providing direct human resource services to the response organization, including compliance with all labor-related laws and regulations. In the performance of this last responsibility, the Human Resources Unit may serve as the implementing arm of the Safety Officer in assuring compliance with OSHA and other safety related training/qualifications outlined in the Safety Plan. The Human Resources Unit is responsible for the following functions:

Serve as the single point of contact for incident personnel to discuss human resources issues and /or concerns;

Issue Standing Orders to all military and Coast Guard Auxiliary personnel including decisions regarding uniform of the day, etc.;

Serve as the single point of contact for receiving reports of inappropriate behavior, acts, or conditions parallel to the operational, logistics, and planning chains of command;

Oversee and process all employee review and performance evaluations as completed by the operational, logistics, and planning supervisors;

Oversee and process all employee incentive and meritorious action awards, including the processing of military awards, for operational, logistics, planning, and finance/administration supervisors, including a peer review of any proposed incentives/awards to assure consistency and factual accuracy; and

Oversee and process all employee personnel records to assure required entries and notations are made in accordance with the various standards of Unified Command agencies/organizations.

6800 RESERVED

6900 RESERVED FOR AREA / DISTRICT

7000 Hazardous Material

7100 Introduction

The spill, release or discharge of hazardous substances is unique compared to an oil spill in that hazardous substances have a greater potential to impact human health. In general, oil spills are of great concern due to their potential to cause long-term damage to the environment. Oil spills do not routinely pose an immediate threat to human life. On the contrary, hazardous substance spills can pose an immediate danger to humans when discharged in even the smallest quantities. This chapter of the ACP provides general guidelines for initial response actions necessary to abate, contain, control, and remove the spilled material and describes some of the unique issues associated with a hazardous material spill.

The definition of hazardous substances is: any substance designated as such by the administrator of the EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S. C. Sec 9601 et seq), regulated pursuant to Section 311 of the federal Clean Water Act (33 U. S. C. Sec. 1321 et seq), or designated by the appropriate state authority.

The definition of harmful quantity is: a quantity of a hazardous substance the discharge or spill of which is determined to be harmful to the environment or public health or welfare or may reasonably be anticipated to pursuant an imminent and substantial danger to the public health or welfare by the administrator of the EPA pursuant to federal law, or by the appropriate state authority.

The following assumptions are made regarding HAZMAT responses:

1. A unified command structure will be established as soon as possible.

Responders will be adequately trained in hazardous substance response and will operate within the level of their training, expertise, and capabilities as described in 29 Code of Federal Regulations, Part 1910.120.

There will be sufficient resources locally available to adequately respond to hazardous substance incidents.

In addition to the Coast Guard and the Environmental Protection Agency in their Federal On-Scene Coordinator roles, many federal, state, and local agencies and other organizations will be providing assistance with hazardous substance response operations. These organizations may include:

1. Vessel and/or waterfront facility owners and operators*
2. Fire and Police Departments
3. Port Authorities
4. Mutual aid organizations

Product experts

Cleanup contractors

* Vessel Response Plans (VRP) and Facility Response Plans (FRP) provide supplemental chemical response guidance to the ACP.

7400 Incident Command

In executing this portion of the Area Contingency Plan (ACP), the senior emergency responder is designated the Incident Commander until relieved by a more senior responder, or until such time as a unified command structure is established. At a minimum, the unified command structure will consist of the Federal On-Scene Coordinator (FOSC), State On-Scene Coordinator (SOSC), and the Responsible Party On-Scene Coordinator (RP-OSC). See Section 2200 for details describing unified command responsibilities.

The Responsible Party for a chemical release impacting waterways within the coastal zone described in Section 1400 will be notified by the Federal On Scene Coordinator (FOSC) by Notice of Federal Interest issued in accordance with 40 Code of Federal Regulations, Part 300. (See Section 3400) The Responsible Party is expected to provide timely and accurate notification, and cooperate with the FOSC's response effort.

Other agencies, organizations, or parties with interest in the response but not designated to serve in the unified command will be engaged by way of the command staff Liaison Officer (see Section 2200).

As soon as practicable, the Incident Commander will establish a command post. (See Section 5400 for predesignated response command post resources and locations)

The primary initial means of communication will be determined by the principal response organization that has jurisdiction to respond to the hazardous substance event. Refer to Sections 2000 and 5300 of this plan for general command, control, and communications procedures common to any sustained response within the Mobile COTP zone.

The Mobile Captain of the Port, in the role of FOSC, will:

Be prepared to assume the role of Incident Commander if the response is inadequate or nonexistent.

Be prepared to assume the role of Incident Commander following conclusion of firefighting response operations if the incident involves pollution or is classified as a marine disaster.

Work in cooperation with the State On-Scene Coordinator to direct the employment of resources in conjunction with an Incident Action Plan.

Resources

Refer to Section 9200 for a list of Hazardous Material contacts.

8000 MARINE FIRE FIGHTING CONTINGENCY PLAN

8100 INTRODUCTION

Section 8000 is currently being updated. Please refer to Sector Mobiles Homeport site <https://homeport.uscg.mil/mycg/portal/ep/portDirectory.do?tabId=1&cotpId=37> . The Sector Mobile Command Center can also be contacted for Marine Fire and Salvage emergencies at 251 -441-6211/ 251-441-5720.

This plan outlines the USCG responsibilities and provides response guidelines for marine fires within Marine Safety Office (SECTOR) Mobile's Area of Responsibility (AOR). The Captain of the Port's (COTP) primary concern in responding to vessel or facility fires is to ensure safety of life. Secondary concerns include maintaining vessel traffic, preserving property, and protection of the environment. To accomplish this, the USCG Marine Safety Office Mobile in association with local fire departments in SECTOR Mobile's AOR have created this fire-fighting plan for responding to vessel and waterfront casualties. The objective of this plan is to provide a prompt, effective, and organized response to a marine fire affecting vessels, waterfront facilities, and the marine environment in ports and waterways within SECTOR Mobile's AOR. The guiding policy for this plan is COMDTINST M16000.11, Marine Safety Manual, Volume VI, Chapter 8.

8101 AUTHORITY

Among the provisions of the Ports and Waterways Safety Act of 1972 (PWSA) (33 U.S.C. 1221 et seq.) is an acknowledgment that increased supervision in port operations is necessary to prevent damage to structures in, on, or adjacent to the navigable waters of the U.S., and to reduce the possibility of vessel or cargo loss, or damage to life, property, and the marine environment. This statute, along with the traditional functions and powers of the Coast Guard to render aid and save property (14 U.S.C. 88b), is the basis for Coast Guard fire fighting activities.

The Commandant, U.S. Coast Guard has delegated authority to the Captain of the Port to enforce port safety and security, and marine environmental protection regulations. This includes, without limitation, regulations for the protection and security of vessels, waterfront facilities; anchorages; security of vessels, safety zones; security zones; regulated navigation areas; deep water ports; water pollution; and ports and waterways safety.

The Commandant (G-M), and the Commander, Eighth Coast Guard District (D8), requires the Captain of the Port Mobile maintain a vessel and waterfront fire contingency plan (See Marine Safety Manual, Vol. 6, Chapter 8). The purpose of the plan is to minimize the effects of damage to life and property in harbors and waterfront areas resulting from a major marine fire and/or explosion.

1. **Fire Departments.** Local fire departments are empowered by city charters and local ordinances to provide fire protection within their areas of jurisdiction. This authority includes fire prevention, fire suppression, and emergency medical services.
2. **U. S. Coast Guard.** The basis for the Coast Guard's fire fighting activities is contained in the Ports and Waterways Safety Act (PWSA) (33 U.S.C. 1221 et seq.), and in the Coast Guard's functions and powers as specified in 14 U.S.C. 88(b). The former acknowledges that increased supervision of port operations is necessary to prevent damage to structures in, on, or adjacent to the navigable waters of the U.S., and to reduce the possibility of vessel or cargo loss, or damage to life, property, and the marine environment. The latter is the basic authority for the Coast Guard to render aid and save property.

8102 PURPOSE AND OBJECTIVE

This document provides for a coordinated response by the U.S. Coast Guard and other federal, local, and civilian forces to major fires on board vessels or at waterfront facilities. It provides policies, responsibilities, and procedures for coordination of on-scene forces. The Marine Fire Fighting Contingency Plan is designed for use in conjunction with other local contingency plans.

9000 Appendices

9100 Emergency Notification

A substantial spill of oil usually has a responsible party (RP) who is aware the discharge has occurred; i.e., a vessel grounding or collision, or a tank or pipeline rupture at a facility. The party responsible for a discharge of oil into the navigable waters of the United States is required by federal law to immediately report the discharge to the National Response Center. Time permitting, the parties are recommended to contact the local Coast Guard Marine Safety Office or Sector. If the discharge occurs within the jurisdiction of a state, then the RP is required to report it to the appropriate state. The number below is provided to help facilitate this process.

NRC USCG

800-424-8802

9110 Notification Checklist

Date/Time of Notification _____

Reporters Name: _____

Address: _____

Phone No: _____

City: _____

Company: _____

State: _____ **Zip Code:** _____

Title: _____

Latitude: _____

Longitude: _____

River Mile: _____

Incident Location: _____

Incident

Description:

Source and/or Cause:

Vessel Name and Number:

Facility Name: _____

Date of Incident: _____ **Time of Incident:**

Material Discharged: _____ **Quantity:**

Is the material in the water? _____ (Y/N) **Is the Source Secured:** _____ (Y/N)

Incident Commander: _____

Where is Incident Command Post:

Directions:

Actions taken to Correct, Control or Mitigate Incident:

Number of Injuries: _____ Number of Fatalities: _____

Were there evacuations? _____ (Y/N) Number of Evacuated: _____

Areas Affected: _____

9210 Federal Resources/Agencies

9210.2 U. S. Coast Guard

Sector Mobile

Brookley Complex	phone:	(251)441-6213
South Broad Street	fax:	(251)441-6169
Mobile, AL 36615	24-hour:	(251) 441-5121
Command Center	24-hour	251-441-5976

Marine Safety Detachment Panama City

Supervisor, DDO	phone:	(850)233-0366
Panama City 1700	fax:	(850)230-1937
Panama City, FL 32407	Emerg:	(850) 230-1957
Station Dauphin Island	phone:	(251) 861-5008
Station Pascagoula	phone:	228-769-5600
Station Gulfport	phone:	228-868-3743
Station Pensacola	phone:	(850) 453-8282
Station Destin	phone:	(850) 244-7147
Station Panama City	phone:	850-234-2377

9210.3 NOAA

National Marine Fisheries Service	(228) 549-1623
National Oceanic and Atmospheric Administration	
Damage Assessment Center	(301)713-3038

9210.4 US Navy Supervisor Salvage (SUPSALV)

Naval Sea System Command	24 hour	(202) 781-3889
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Supervisor of Salvage - U.S. Navy Working hours (202)781-0534
2531 Jefferson Davis Hwy.
Arlington, VA 22242-5160

9210.5 EPA Emergency Response Teams

Mobile Area EPA representative
Leo Francendese cell phone 404-606-2223
EPA Response & Prevention Branch
Sam Nunn Atlanta Federal Center Day time # (404)562-8700
61 Forsyth Street, SW 24-hour # 404-242-3393
Atlanta, GA 30303-3104
EPA Region IV (www.epa.gov) (404) 562-9900

9210.6 Agency for Toxic Substance and Diseases (ATSDR)

ATSDR
1600 Clifton Road NE (E-57) phone: (404)498-0120
Atlanta, GA 30333

9210.7 Weapons of Mass Destruction Teams

46th Civil Support Team (WMD) (334)-213-7753
3101 Tine Ave,
Montgomery, AL 36108
Operations Officer
FBI Special Agent Bomb Technician Desk (251)415-3228
Tim Green Cell (251)281-7129

9210.8 Miscellaneous Federal Agencies

Federal Communications Center (888) 225-5322
Immigrations and Customs Enforcement (ICE) 1-800-973-2867
Minerals Management Service (www.mms.gov) (800) 200-4853
American Crop Protection Association (www.acpa.org) (202) 296-1585
U.S. Customs and Border Protection (CBP) Mobile (251) 441-5111
Pensacola (850) 433-3205
Panama City (850) 785-4688
Gulfport (228) 863-6350

Pascagoula (228) 762-7311
Jackson/Vicksburg (601) 932-3324

9210.9 Department of Interior

DEPARTMENT OF INTERIOR - U.S. FISH AND WILDLIFE SERVICE

(Federal trustee for Natural Resource Damage Assessment)

Alabama (Daphne) Phone: (251)441-5181
Mississippi (Jackson) Phone: (601)965-4900
Florida (Panama City) Phone: (850) 769-0552

DEPARTMENT OF INTERIOR

Director: Joyce Stanley phone: (404)852-5414

GINS-DISTRICT RANGER

MR. ROBERT HARRIS Phone: (228)230-4107
Fax: (228) 872-2954

GINS-RESEARCH MANAGER

MR. GARY HOPKINS Phone: (228) 230-4104
National Park Service (www.nps.gov) (850) 934-2600

Gulf Islands National Seashore (www.nps.gov/guis/index.htm)

U.S. Fish & Wildlife Service Mobile (251) 843-5238

U.S. Fish & Wildlife Service Gautier (228) 497-6322

(www.mississippisandhillcrane.fwf.gov)

9210.10 Bureau of Safety and Environmental Enforcement

BSEE GOM Oil Spill Response POC (504) 736-2529
Gary Petrae

BSEE GOM Pipeline Section POC Office (504) 736-2876
Angie Goodert Secretary 504-736-2814
Afterhours (504) 452-3562
Secondary 504-615-8608

9210.11 USCG National Strike Force (NSF)

Atlantic Strike Team, Fort Dix, NJ (609) 724-0008
Gulf Strike Team, Mobile, AL (251) 441-6601
Pacific Strike Team, Novato, CA (415) 883-3311
National Strike Force Coordination Center,
Elizabeth City, NC (252) 331-6000

9210.12 USCG District Response Advisory Team (DRAT)

Commander (mer)
Eighth Coast Guard District phone: (504)671-2231
Hale Boggs Federal Bldg. phone: (504) 589-6225 (24 hrs)
501 Magazine Street
New Orleans, LA 70130-3396

9210.13 USCG Public Information Assist Team (PIAT)

Eighth District Public Affairs

PAO phone: (504)671-2020
USCG 8th District (dpa) fax: (504)671-2022
500 Poydras St,
Suite 1234 24-hour: (504)319-2229
New Orleans, LA 70130

Public Information Assist Team (PIAT)

NSFCC - PIAT phone: (252)331-6000 x3025
1461 US Highway 17 North fax: (252)331-6012
Elizabeth City, NC 27909

Coast Guard Atlantic Area Public Affairs:

USCG Atlantic Area PA phone: (757)398-6608
431 Crawford Street fax: (757)391-8109
Portsmouth, VA 23704-5004

Coast Guard Commandant's Media Relations Branch

Media Relations Branch phone: (202)372-4633
USCG Commandant (G-CP-2) fax: (202)267-4307
2100 Second Street SW 24 hour: (202)267-2100
Washington, DC 20593

9210.14 USCG Reserve

Reference Sector Mobile reserve Roster.

9210.15 Auxiliary

Reference Sector Mobile Auxiliary Roster

9210.16 NOAA Scientific Support Coordinator (SSC)

Adam Davis (Mobile SCC)	Office:	251.544.5012
	Cell:	206.549.7759
	E-mail	<u>Adam.Davis@noaa.gov</u>
Jim Jeansonne	office phone:	(251) 544-5008 or 5006
	cell	727-551-5714
Kyle Jellison (D8)		713-671-5100 ext.1052
Eighth Coast Guard District	phone:	(504) 589-4416 or 4414
Hale Boggs Federal Bldg.	24 hour cell:	(206) 526-4911
501 Magazine Street	fax:	(206) 526-6329
New Orleans, LA 70130-3396		
NOAA HQ, Seattle Wa. 24 Hr.		(206)526-4911

**9210.17
Atmospheric Modeling**

NOAA Oceanic and

NATIONAL WEATHER SERVICE Mobile/Pensacola 8400 Airport Blvd, Bldg 11 Mobile, AL 36608	Not for Public #	(251)633-2471
NATIONAL WEATHER SERVICE Austin/San Antonio, Texas 78130		(830)629-0205
NATIONAL WEATHER SERVICE Tallahassee Weather Forecast Office Love Building Florida State University Tallahassee, FL 32306-4509		(850)942-8833

9210.18 Department of Defense

U.S. ARMY

Corps of Engineers (<u>www.usace.army.mil</u>)	(251) 690-2495
Ft. Benning, Columbus, GA	(706) 545-2011

Ft. McClellan, Anniston, AL (256) 848-3847
Ft. Rucker, AL., Military Police (334) 255-2222

U.S. AIR FORCE

Columbus AFB, Columbus, MS (662) 434-7322
Eglin AFB, Valparaiso, FL (850) 882-1113
Gunter AFB, Montgomery, AL (334) 953-1110
Keesler AFB, Biloxi, MS
(www.mil.keesler.af.mil) (228) 377-4330
Maxwell AFB, Montgomery, AL (334) 953-7333
Tyndall AFB, Panama City, FL (850) 283-1113

U.S. NAVY

Naval Air Station Meridian, MS (601) 679-2211
Naval Air Station Pensacola, FL (850) 452-4785 or
(850) 277-1110

USN Supply Center, Warehouse 12,
Naval Air Station Whiting Field, Milton, FL (850) 623-7011

U.S. MARINE CORPS

U.S. Marine Corps Logistics Base, Albany, GA (229) 639-5000

9210.20 Department of Justice

FBI Mobile (www.fbi.gov) (251) 438-3674
FBI Gulfport (228) 864-6131
fax (228) 214-2335
FBI Pascagoula (228) 769-7920
FBI Jackson county MS (601) 948-5000
FBI Pensacola (850) 432-3476

9220 State Resources/Agencies

Under Development

9220.1 Government Official Liaisons

Under Development

9220.2 Trustees for Natural Resources

Under Development

9220.3 Alabama

AL Emergency Management Agency	(205)280-2200
AL Department of Environmental Management (www.adem.state.al.us)	(251) 450-3400
Mobile Field Office:	(251) 432-6533
Field Office	251-304-1176
AL Dept. of Conservation and Nat. Resources	(251) 861-2882
AL Dept. of Economic and Community Affairs	(334) 242-5100

9220.4 Mississippi

MS Emergency Management Agency (www.msema.org.com)	(800) 445-6362 (601) 933-6362
MS Department of Environmental Quality (www.deq.state.ms.us)	(601) 961-5171
MS Department of Marine Resources	(228) 374-5000
MS Bureau of Pollution Control	office (601) 961-5171 24 Hr. 800-222-6362
(www.deq.state.ms.us)	
Marine Patrol	(800) 294-5551

9220.5 Northwest Florida

FL Department of Environmental Protection	(850) 595-8300
Florida Fish & Wildlife Office	(850) 595-8605
Northwest Florida Water Mgmt. District	(850) 539-5999
FL Department of Aquaculture	(850) 653-9353
FWC's Florida Fish and Wildlife Research Institute (FWRI)	(727) 896-8626
FL Emergency Management (Response)	(850) 413-9814
Director (www.floridadesaster.org)	(850) 413-9969

9220.6 Alabama

AL Department of Environmental Management (www.adem.state.al.us)	(251) 450-3400
AL Dept. of Conservation and Nat. Resources	(251) 861-2882

9220.7 Mississippi

MS Department of Environmental Quality (www.deq.state.ms.us)	(601) 961-5171
MS Bureau of Pollution Control (www.dequ.state.ms.us)	(601) 961-5171

9220.8 Northwest Florida

FL Department of Environmental Protection	(800)320-0519
Northwest Regulatory Office	(850) 595-8300
Northwest Florida Water Mgmt. District	(850) 539-5999
FL Department of Aquaculture	(850) 410-0893

9220.9 State Historic Preservation Office

ALABAMA

State Historic Office	(334) 242-3184
FT. Morgan	(251) 540-5257
FT. Mims	(251) 937-5710

MISSISSIPPI

Mississippi Department of Archives and History	(601) 576-6850
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FLORIDA

Office of Cultural and Historic Programs	(850) 245-6300
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9220.10 State Law Enforcement Agencies

AL Highway Patrol/ bomb Squad (www.dps.state.al.us)	251-660-2300
AL Marine Police	251-981-2673
FL Highway Patrol	
Panama City	850-872-4150
Pensacola	850-484-5000

FL Fish and Wildlife Conservation Commission	850-488-6251 or
Office	850-265-3676
Mississippi State Police	228-539-4881

9220.11 Hazardous Substances Response Teams

ALABAMA

Fire Department Mobile	251-208-7351
Fire Department Bayou La Batre	251-824-9286
Fire Department Bay Minnette	251-452-6459
Fire Department Chickasaw	251-452-0571
Fire Department Daphne	251-621-2836
Fire Department Fairhope	251-990-0143
Fire Department Prichard	251-452-7828
Fire Department Saraland	251-675-5103
Fire Department Satsuma	251-679-1640

FLORIDA

Fire Department Okaloosa	850-689-5766
Fire Department Ft. Walton Beach Station 6	850-833-9565
Fire Department Ft. Walton Beach Station 7	850-833-9572
Fire Department Valparaiso	850-729-5410
Fire Department Gulf Breeze	850-934-5133
Fire Department Milton	850-983-5430
Fire Department Panama City	850-872-3030
Tyndall AFB Fire Department	850-283-2884
Fire Department Pensacola	850-436-5200
NAS Pensacola Fire Department	850-452-3211
Fire Department Pt. St. Joe	850-229-6337
Emergency:	850-227-1115

MISSISSIPPI

Fire Department Biloxi	228-435-6200
Fire Department Gulfport	228-868-5954
Pascagoula Fire Department	228-762-3066
Pascagoula Naval Station Fire Department	228-761-2027
Fire Department Bay St. Louis	228-467-4736
Fire Department Waveland	228-467-2042

9230 Local Resources/Agencies

9230.1 Local Trustees for Natural Resources

9230.2 Local Emergency Planning Committees

Mobile County EMA	phone:	(251) 460-8000
Jackson County EMA/LEPC	phone:	(228) 769-6508
Baldwin County EMA	phone:	(251) 972-6807
Escambia County EMA	phone:	(850) 471-6400
Santa Rosa County EMA	phone:	(850) 983-5372
Walton County EMA	phone:	(850) 892-8065
Okaloosa County EMA	phone:	(850) 651-7560
Gulf County EMA	phone:	(850) 229-9110
Franklin County EMA	phone:	(850) 653-8977
Wakulla County EMA	phone:	(850) 926-0860
Hancock County EMA	phone	(228) 466-8200

9230.3 Local Environmental Agencies

ALABAMA

Bon Secour, National Wildlife Refuge	(251) 540-7720
Dauphin Island Sea lab	(251) 861-2141/7507
Weeks Bay, National Estuarine Research Reserve	(251) 928-9792
Mobile Bay, National Estuary Program	(251) 431-6409

MISSISSIPPI

Gulf Islands National Seashore (GINS)	
District Ranger:	(228) 875-0823
Research Manager:	(228) 875-9057
NATIONAL MARINE FISHERIES SERVICES, MS	(228) 762-4591

FLORIDA

GULF ISLANDS NATIONAL SEASHORE (GINS)	(850) 916-3010
ROCKY BAYOU STATE RECREATION AREA	(850) 833-9144
GRAYTON BEACH STATE PARK	(850) 231-4210

9230.4 Law Enforcement Agencies

ALABAMA

BALDWIN COUNTY

Baldwin County Sheriff (www.SheriffofBaldwin.com)	251-937-0202
Emergency Management Civil Defense South	251-972-6807
North	251-937-0317
Eastern Shore	251-990-4605

MOBILE COUNTY

Civil Defense (EMA) (www.mcema.net)	251-460-8000
Sheriff's Department	251-574-8633

CITY OF BAY MINETTE

Police Department	251-580-2559
www.cityofbayminette.org/Departments/PoliceDepartment.aspx	

CITY OF CHICKASAW

Police & Fire Department	251-452-0571
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CITY OF CREOLA

Police Department	251-675-8145
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CITY OF DAPHNE

Fire Department	251-621-2836
Police Department	251-621-9100

CITY OF FAIRHOPE

Police Department (www.cofairhope.com)	251-928-2385
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CITY OF MOBILE

Police Department	251-208-6304
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CITY OF PRICHARD
Police Department 251-452-7900

CITY OF SARALAND
Police Department (www.saraland.org) 251-675-5103

CITY OF SATSUMA
Police Department (www.cityofsatsuma.com) 251-675-0151

CITY OF WILMER
Police & Fire Department 251-441-3574

FLORIDA

COUNTY OKALOOSA
FL Highway Patrol 850-689-7904
FL Game and Fish 850-245-7716

COUNTY SANTA ROSA
Sheriff's Department 850-983-1100
FL Highway Patrol 800-459-6861

COUNTY ESCAMBIA
Sheriff's Department (www.escambiaso.com) 850-436-9620
FL Highway Patrol 850-459-6861
FL Emergency Management Public Safety 850-595-3311
Civil Defense (EMA) 850-436-9710

CITY OF CARRABELLE
FL Marine Patrol (FWCC) 850-697-3741
Police Department 850-697-3691

CITY OF FREEPORT
Sheriff's Department 850-834-4159
FL Highway Patrol 800-459-6861
FL Dept. Environmental Protection L.E 850-245-2118
Walton Co.So. Substation 850-837-7155

CITY OF FT WALTON BEACH

Sheriff's Department (www.sheriff-okaloosa.org) 850-651-7400

Police Department (www.fwb.org) 850-833-9546

CITY OF VALPARAISO

Police & Fire Departments (www.valp.net) 850-729-5410

CITY OF GULF BREEZE

Police Department (www.gulfbreezepolice.com) 850-934-4050

CITY OF MILTON

Police Department (www.ci.milton.fl.us/police.html) 850-983-5420

CITY OF PANAMA CITY

Sheriff's Department (www.bayso.org) 850-747-4700

Police Department 850-872-3100/3112

Florida Highway Patrol 850-872-4150

CITY OF PENSACOLA

Police Department (www.pensacolapolice.com) 850-435-1915

Florida Highway Patrol 850-484-5000

CITY OF PORT ST. JOE

Sheriff's Department 850-639-3023

Florida Highway Patrol 800-459-6861

Police and Fire Department 850-229-8265

MISSISSIPPI

GULFPORT/BILOXI

Sheriff's Department 228-865-7092

Mississippi State Police 601-987-1530x47

CITY OF PASCAGOULA

Jackson County Sheriff 228-769-3063

Mississippi State Police 601-987-1530x47

CITY OF BAY ST. LOUIS

Bay St. Louis City Police Dept	228-467-9222
Hancock County Civil Defense	228-255-0942
Hancock County Sheriff's Office	228-466-6900

CITY OF WAVELAND

Waveland Police Dept	228 467-3669
Jones County Civil Defense	228-467-9226
Hancock County Sheriff's Office	228-466-6900

9230.5 Port Authority/Harbormaster

MOBILE

Harbormaster	251-441-7251/7250
Mobile Port Authority	251-441-7200
Mobile Bar Pilots' Association	251-432-2639
Health Department	251-937-6935

GULFPORT/BILOXI

MS Port Authority	228-865-4300
Operations	228-865-4315
Gulfport Pilots Association	228-863-6559
(Rusty Hilton) Cell	228-365-5532

PASCAGOULA

Harbormaster	228-762-4041
Jackson County Port Authority	228-762-4041
Bar/Harbor Pilots	228-762-1151

PENSACOLA

Port Authority	850-436-5080
Bar Pilots Association	850-224-0219

PANAMA CITY

Panama City Port Authority	850-767-3230
Harbor/Bar Pilots	850-785-2524

PT. ST. JOE

Mobile, AL.	Phone:	251-662-3500
Hepaco Theodore, AL	Phone:	251-706-5841
Bisso Marine Salvage New Orleans, LA	Phone: 24-Hour	504-866-6341
MSRC Pascagoula, MS	Phone:	228-769-9598
Airborne Support Inc (Dispersants) Houma, LA	Phone:	985-851-6391

9240.2 Media (Television, Radio, Newspaper)

ALABAMA & FLORIDA (COASTAL COUNTIES)

Associated Press (AP) (www.al.com)	251-433-7269
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NEWSPAPERS

Mobile Register News Desk	251-219-5454
Mobile Beacon Inc	251-479-0629
Panama City News Herald (www.newsherald.com)	850-747-5070
Pensacola News Journal (www.pnj.com)	850-435-8500
Tallahassee Democrat (www.ttdo.com)	850-599-2100

RADIO STATIONS

WABB (www.wabb.com)	251-432-5572
WAVH (www.1065fm.com)	251-344-1065
WBHY (www.goforth.org)	251-473-8488
WKRK (www.wkrk.com)	251-479-5555
WFTW (www.wftw.com)	850-664-1260
WTKX (www.tk101.com)	850-473-0400
WBSR	850-438-4982

WCOA (www.wcoa.gulf.net)	850-478-6011
WMEZ (www.softrock941.com)	850-916-9222
WTNT (www.wtntfm.com)	850-386-6143
WXBM (www.wxbm.com)	850-994-5357

TELEVISION STATIONS

Mobile

WALA TV (10) (www.fox10tv.com)	251-434-1010
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Pensacola

	850-494-1010
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WKRK TV (5) (www.wkrk.com)	251-479-5555
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WEAR TV (3) (www.weartv.com)	850-456-3333
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Toll Free	866-856-9327
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WMBB TV (13) (www.wmbb.com)	850-769-2313
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WJHG TV (7) (www.wjhg.com)	850-234-7777 or 850-230-5221
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WCTV TV (6) (www.wctv6.com)	850-893-6666
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WTXL TV (27) (www.wtxl.com)	850-893-3127
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WFSU TV (11) (www.wfsu.org)	850-487-3170
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MISSISSIPPI (COASTAL COUNTIES)

Associated Press (AP) (www.ap.org)	504-523-3931
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NEWSPAPERS

South Mississippi Sun Herald (www.sunherald.com)	228-896-2327
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Mississippi Press (www.mspress.org)	228-762-1111 or 601-981-3060
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RADIO STATIONS

WGCM (www.coast102.com)	228-896-5500
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	888-771-3742
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9240.6 Academic Institutions

Marine fire-fighting training division (800) 256-3473
Lsu fire & emergency training institute (225) 224-6300
6868 nicholson drive
Baton rouge, la 70820

Texas a&m center for marine training & safety (teex)
texas a&m (teex) phone: (877) 833-9638
301 tarrow phone: (979) 458-6800
college station, tx 77840-7896

9240.7 Laboratories

USCG Marine Safety Laboratory

1082 Shennecossett Road phone: 860-441-2645
Groton, CT 06340-6094 fax: 860-441-2641

Precision Petroleum Labs, Inc. (FINGERPRINT ANALYSIS)

5915 Star Lane phone: (713)680-9425
Houston, Texas 77057 fax: (713) 680-9564

9240.8 Emergency Medical Services

American Medical Response Inc (Jackson MS) phone: 601-982-7911
American Medical Response Inc (Gulfport MS) 228-897-7000
Mobile County Emergency Medical phone: (251) 343-7131

9240.9 Fire Fighting

WILD WELL CONTROL INC.

2202 Oil Center Ct., phone: 24-hour (281) 784-4700
Houston, TX 77073 fax: (281) 353-5480

WILLIAMS FIRE & HAZARD CONTROL, INC.

1675 Texla Road phone: (409) 727-2347
Vidor, TX 77662 fax: (409) 745-3021
Emergency: (281) 999-0276

Personnel on Staff: 80 Fax: (504) 865-8132
Contact: Cappy Bisso

SMIT INTERNATIONAL AMERICAS, INC.

15402 Vantage Parkway East (281) 372-3500
Suite, 316 Houston, TX 77032 Fax (281) 372-3525

Gulf Stream Marine, INC. (A HALLIBURTON CO.)

14035 Industrial Road Office (713) 450-8888
Houston, TX 77015 Phone: 24-hour (713) 926-9631
Fax (713) 450-8828

DONJON MARINE CO., INC.

1250 Liberty Ave. Office: (908) 964-8812
Hillside, N.J. 07205 Fax: (908) 964-7426

Contact: Steven Newes

Donjon Marine has the current U.S. Navy Salvage Contract that includes the USGOM.

SALVAGE MASTERS / CONSULTANTS

THOMAS K. FLESNER LLC

8524 Hwy. 6 N #213 Office: (281) 744-5729
Houston, TX 77095 Fax: (281) 345-0339

Contact: Tom Flesner

U.S. NAVY SUPERVISOR OF SALVAGE (SUPSALV)

2531 Jefferson Davis Hwy. Office: (202) 781-1731
Arlington, VA 22242-5160 Fax: (202) 781-4588

Contact: Duty Officer Emergency: (202) 781-3889

U.S. COAST GUARD MARINE SAFETY CENTER

Salvage Engineering Response Team (SERT)

400 Seventh St. SW Office: (202) 327-3985
Washington, DC 20590 (202) 327-3987

Contact: Duty Officer Fax: (202) 366-3877

9240.11 Divers

BOSARGE DIVING INC.

P.O. Box 2455 Office: (228) 762-6361

Pascagoula, MS 39569-2455 (888) 762-6364

Contact: Steve Johnson Fax: (228) 762-6361

SEA TOW

P.O. Box 915	Office:	(228) 374-1092
Biloxi, MS 39533	Fax:	(228) 872-6149
BISSO MARINE CO. INC.		
PO Box 4113	Office:	(504) 866-6341
New Orleans, LA 70178		(800) 752-4776
Contact: Kelly Steele	Fax:	(504) 865-8132
CAL DIVE INTERNATIONAL		
2500 CityWest Blvd.	Office:	(713) 361-2600
Houston, TX 77042-3097	Toll free	(877) 361-2600
	Fax:	(713) 361-2690
H. J. MERRIHUE		
P.O. Box 23123	Office:	(504) 466-2800
New Orleans, LA 70123	Fax	(504) 466-9850
Contact: Chad Byard		
EPIC DIVERS, INC. 1841 Enterprise Dr.		
Harvey, LA 70058	Office:	(800) 844-3742
Contact: Joe Citutac		(504) 340-5252
	Fax:	(504) 340-5416

9250 Stakeholders

ALABAMA

Midstream Fuel (Blakely)	(251) 439-7248
Midstream Fuel Services, Inc. (Theodore)	(251) 439-7244
Atlantic Marine Inc.	(251) 690-7100
Occidental Chemical	(251) 452-7620
Olin Chemical Corp.	(251) 944-2231
Transmontaigne (Radcliff Economy)	(251) 433-0066
Alabama Bulk Terminal	(251) 438-9891
Ebonik/Degussa Corporation	(251) 443-4724
Gulf Atlantic Operations	(251) 433-5418
British Petroleum Oil	(251) 456-3131
Mobile Middle Bay Port	(251) 441-7003
Steigler Shipping	(251) 639-7300
Shell Chemical	(251) 679-7139
INEOS Phenol	(251) 443-3115

FLORIDA

Murphy Oil	(850) 835-4123
Citgo	(850) 678-5159
Amerigas	(850) 769-5165
Chevron	(850) 785-7426
TransMontaigne	(850) 432-5133

MISSISSIPPI

Chevron	(228) 938-4563
First Chemical Corp	(228) 762-0870
Mississippi Phosphates	(228) 762-3210
Ingall Ship Building	(228) 935-1122

9260 Miscellaneous Contacts

NON-COAST GUARD RESOURCES AND GENERAL INFORMATION.

MOBILE, AL

Life Flight (www.flightwcb.com)	800-874-1555
National Marine Fisheries Service (NMFS)	228-762-4591

PENSACOLA, DESTIN AND PANAMA CITY

Life Flight (Pensacola AOR)	850-434-4555
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GENERAL INFORMATION

Scott AFB (for Civil Air Patrol)	800-851-3051
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9260.1 Lightering

MSRC	Phone:	1-800-645-7745
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9260.2 Towing Companies

Crescent Towing Company (www.coopertsmith.com)

118 N. Royal Street 12th Floor	Phone:	(251) 433-2580
Mobile, Alabama 36602	Fax:	(251) 433-2593

Waterways		Towing
Bender Ship Yard Gate 7	24 Hr:	(251)-438-5240
Mobile, AL 36603		

Mobile Bay Towing (www.seabulkinternational.com)

Alabama State Docks	24 Hr:	251-432-2611
Mobile, AL 36603		

Warrior & Gulf

50 Viaduct Rd	Phone:	251-452-6000
Chickasaw, AL 36611		

Gulfport Towing

778 Copa Blvd	Phone:	228-323-1631
Gulfport, MS		

Higman Towing Company

(713) 552-1101

Kirby Inland Marine Inc

(713) 435-1000

ACBL

(877) 857-1225

9260.3 Railroad Emergency Contacts

Union Pacific Railroad	(888) 877-7267
Burlington Northern/Santa Fe Railroad	(800) 832-5452
Kansas City Southern Railroad	(800) 892-6295

9260.4 Utility Companies

Mississippi Power Company	(800) 353-9777
Alabama Power Company	(888) 430-5787
Gulf Power Company	(800) 225-5797

9260.5 Command Posts

9260.6 Rental Command Posts

GE Capital Modular Spaces		
5350 Rangeline Rd	phone:	(850) 438-4255
Mobile/Pensacola		

9260.7 Local Portable Command Posts

Gulf Strike Team, Mobile, AL

(251) 441-6601

9260.9 Aircraft Rental

Petroleum Helicopters Inc. (PHI) (<http://www.phihelico.com/>)

6000 Deakle Road #2

Theodore, AL 36582

phone:

(251) 973-9071

Bristow US LLC

4605 Industrial Dr.

phone:

(337) 365-6771

New Iberia, LA 70560

fax:

(337) 364-8222

Air Ambulance Network Inc.

(800) 327-1966

United States Air Force Auxiliary (CAP)

Alabama Wing

phone:

(334) 953-6465

fax:

(334) 953-7637

Mississippi Wing

phone:

(601) 353-1020

fax:

(601) 354-9278

Florida Wing

phone:

305-224-6734

fax:

305-224-6654

24 Hour (CAP HQ)

phone:

(888) 211-1812

9260.10

Airports

Stennis International Airport

William P. Cotter, Airport Manager

P.O.Box 2267

(228) 467-7070

Bay Saint Louis, Ms. 39521

Fax:

(228) 467-7016

Mobile Regional Airport

8400 Airport Blvd.

(251) 633-4510

Mobile AL.36695

Fax:

(251) 639-7437

Pensacola Regional Airport

2430 Airport Blvd.

(850) 436-5000

Pensacola Fl. 32514

Fax:

(850) 436-5006

Panama City-Bay County International Airport

3173 Airport Road

(850) 763-6751

Panama City Fl. 32405

(850) 785-5674

9260.11 Lodging

Gulfport

Days Inn and Suites	228 864-5135
Holiday Inn Express	877 531-5084

Pascagoula

Regency Inn, 3800 Hospital Rd.	228 762-2800
Super 8, 4419 Denny Ave. Hwy 90	228-762-9414

Mobile

Best Inn and Suites 150 Beltline Hwy South	251-344-2121
Drury Inn Mobile 824 West I-65 Rd. South	251-344-7700

Pensacola

Quality Inn NAS/Corry, 3 New Warrington Road	850-455-3233
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Destin

Days Inn, 1029 E Hwy 98	850 837-4667
Scene Gulf Inn Suites, 39 Old Hwy 98	850 837-2378

9260.12 Food & Water (Under Development)

L.A. Barbeque Catering, Hwy 59, Summerdale, AL	251 947-8722
Ron's Catering LLC Saraland, AL 36605	(251) 599-4944
Sonny's BBQ, Pensacola, FL	850 476-7618

9260.13 Temporary Storage and Disposal Facilities (TSD)

USES

Mobile, AL.	Phone:	251-662-3500
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ORC

Mobile, AL.	Phone:	251-432-4223
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9260.14 Maintenance and Fueling Facilities

Midstream Fuel Services

Hwy 98 West, Blakely Island	phone:	(251) 439-7248
Mobile, AL 36652	fax:	(251) 433-9400

Midstream Fuel Services

5320 Ingalls Avenue	phone:	(228) 762-0636
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Pascagoula, MS 39581	fax:	(228) 769-5963
Plains Marketing		
101 Baybridge Rd.	Phone:	(251) 456-3131
Mobile, AL 36601	fax:	(251) 456-9615
Chevron		
525 W. Beach Dr.	phone:	(850) 785-7426
Panama City, FL 32401	fax:	(850) 784-1566

9260.15 Large Rental Facilities

TO BE DEVELOPED

9260.16 Industrial Hose Suppliers

Hiller Systems Inc.		
Gulf Sales and Supply		
1909 Kenneth Ave	phone:	(228) 762-0268
Pascagoula, MS 39567	fax:	(850) 433-3962

9260.17 Workboat/Offshore Supply/Other Vessels

Hopkins (for dredges working in the area)	251-694-3710
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BARGE FLEETING

MOBILE, AL

Biehl & Company	251-432-1605
Bulk Shipping	251-433-1585
Lott Shipping	251-433-1621
T. Parker Host Inc Alec May	251-433-1536
Star Shipping (www.starshipping.com)	251-433-3800
Stiegler Shipping (www.stiegler.net)	251-639-7300
Inchcape Shipping Service	251-461-2747

PENSACOLA, FL

Star Shipping (www.starshipping.com) 251-433-3800

PASCAGOULA, MS

Inchcape Shipping (www.iss-shipping.com) 251-461-2747

GULFPORT, MS

Dole Fresh Fruit (www.dole.com) 228-864-8282

9260.18 Alternative Technology Response Equipment

IN-SITU BURNING (Note: Refer to USCG Eighth District ISB Plan)

Fire Retardant Boom:

MSRC 800-645-7745
Flare Type - CCA (Clean Channel Association) (713)534-6195
Flare Type - MSRC (409)740-9188

Air Monitoring:

USCG/GST SMART (713) 671-5113
(251) 441-6601

Consultants:

SpilTec, Al Allen (425) 896-0988

Dispersant Application

DISPERSANT AIRCRAFT
Airborne Support, Inc. (ASI) (985) 851-6391

EADC (Emergency Aireo Dispersant Consordium) (207) 665-2362
(888) EADC14U

Dispersant Sources

LOOP, Inc. (504) 363-9299

Oil Spill Response

(954) 987-3001

Ondeo Nalco Energy Svcs

Melinda Fikes

(281) 263-7434

Location: Sugarland, TX

(800) 366-2526

Consultants

The O'Brien's Group

(985) 781-0804

Bioremediation

Oil Mop, Inc., Belle Chase, LA

(504) 394-6110 or

800-645-6671 24/7

Oppenheimer Biotechnology

P. O. Box 5919

(512) 474-1016

Austin, TX 78763

9260.19 Trucking/Transportation Companies

U-HAUL

(251) 343-7101

200 W I-65 Service Rd

Mobile, AL 36608

9300 Draft Incident Action Plan (IAP) for WCD Scenario

9400 Area Planning Documentation

9410 Discharge and Release History

SECTOR MOBILE SPILL HISTORY

<u>DATE</u>	<u>LOCATION</u>	<u>INVOLVED PARTY</u>	<u>PRODUCT</u>	<u>AMOUNT</u>
May 11	Mississippi Canyon 252	BP	Crude	5 Mil
BBLs				
08 SEPT 11	Mobile River	GCAC	Light Crude	
140 BBLs				

The Sector Mobile AOR contains 5 deepwater ports (Gulfport, Pascagoula, Mobile, Pensacola, and Panama City). Primary transportation routes and the navigational risks associated with each can be found in the NOAA Coast Pilot 5, Chapter 5. In addition to deep draft vessel traffic transiting the ports, there is a high volume of tugboat and barge traffic transiting the Gulf Intracoastal Waterway and the inland rivers of the Mobile COTP zone.

Of the five deepwater ports, the greatest risk for a major spill is in the Pascagoula area. The Port of Pascagoula has the highest volume of tank vessel traffic in the Mobile COTP zone, and has several large refineries and chemical plants.

There are numerous fixed platforms in the Mobile COTP zone, all of which are located in the western portion of the AOR. These platforms transfer petroleum products to shore via thousands of miles of pipelines.

Vulnerability Analysis

The entire coastline of Mississippi, Alabama and Northwest Florida can be considered environmentally sensitive due to salt and freshwater marsh areas that make up the coastal wetlands.

A large part of the Mobile Coastline consists of the Gulf Islands National Seashore, which stretches 160 miles from Cat Island in Mississippi to the eastern tip of Santa Rosa Island in Florida. Horn and Petit Bois Islands located in Mississippi are federally designated wilderness areas. The deepwater entrance to Pascagoula harbor is the Horn Island Pass.

For more information on environmentally sensitive areas, reference the Sector Mobile Geographic Specific Tactical Response Plan.

Seasonal/ Weather Considerations

While navigating the Gulf of Mexico presents few weather hazards, the ones that occur can be treacherous. Winter storms and cold fronts can generate gales and rough seas. Sea fog, frequent from December through April, can plague the mariner in open and coastal waters. During summer and fall, there is the threat from hurricanes.

Subcommittees review applicable sections & are evaluated by Chairman and Steering Committee for final approval. Area Contingency Plans shall be reviewed and updated annually by the Area Committee. Plans shall be reviewed to ensure all information is current, and in particular, the following areas shall be looked at: emergency notification list, response equipment information (type and amount of

equipment available), sensitive areas, hazard/risk assessment of the area, response strategies (changes based on new technology, new equipment, etc.), dispersant approval. Any changes to the plan must be noted on the record of changes page.

The FOSC shall periodically conduct drills of removal capability, without prior notice, in areas for which Area Contingency Plans are required, to assess the effectiveness of such plans and relevant tank vessel and facility response plans. These drills may include participation by Federal, State, local agencies, owners and operators of vessels and facilities in the area, and private industry. The NSFCC will act as a clearinghouse for these exercises, participating in the development, execution, and evaluation to the fullest extent practicable, with the cognizant program managers of the USCG and EPA. The NSFCC may, in conjunction with the cognizant program managers of the USCG and EPA, impose unannounced area or multi-area exercises.

[NOTE: The NSFCC is responsible for executing the National Response System Pollution Exercise Program (NRSPEP). All Coast Guard participation in exercises will be coordinated with and/or through the NSFCC.]

All responses will be in the Sector Mobile COTP AOR unless conducted jointly with other AOR's (as in SON's exercises). All other assumptions will be as decided by the drill committee.

9440 Planning Scenarios

REFERENCE THE DIGITAL AREA CONTINGENCY PLAN ONLINE AT:
ocean.floridamarine.org/acp/mobacp/

9440.1 Worst Case Discharge Scenario

Murphy Exploration and Production Company operate Sector Mobile's Worst Case Discharge Scenario, which is an Outer Continental Shelf (OCS) facility in oil block 4 of Desoto Canyon (OCS # G10437). This well is located in 5,288 feet of water and produces 110,560 barrels of oil a day with an API gravity of 35.1. The platform is 76 miles from Louisiana, 91 miles from Alabama, and 97 miles from Florida, which poses a significant threat to nearby coastlines if the well were to have a continuous blowout.

Worst case discharge modeling indicates of the 110,560 barrels discharged during a blow out, 22% would naturally evaporate or disperse (24,323bbls). The remaining 86,237 barrels would be dealt with using both dispersants and in-situ burning. Murphy Exploration and Production provides comprehensive plans to conduct both dispersion and in-situ burn operations. The daily dispersant capability is 7,540 barrels and the daily in-situ burning capability is 4,311 barrels. Discharge scenarios suggest that during a 30, 60, 90 and 120 day blow-out estimates of discharged oil would be 3,316,800bbls, 6,633,600bbls, 9,950,400bbls, 13,267,200 respectively.

During drilling operations there are two areas for potential loss of well control. These are categorized as surface hole drilling, which does not have a potential for

oil discharge and drilling below the surface of the hole, which is the primary source of an oil discharge. While drilling below the surface kicks can occur due to abnormally forming pressure from the weight of drilling fluid, tripping too fast, not filling the hole, mud losses due to lost circulation zones, though most kicks occur due to human error. Equipment alone will not prevent kicks from occurring. Personnel must be trained to monitor drilling operations and react correctly to anomalies.

Blow-out prevention equipment and procedures will be used to remove the kick in a below surface well before a more serious blow-out can occur. Blow-out preventer (BOP) and casing installations must conform to BSEE regulations (30 CFR 250, subpart D). BOP equipment will contain fluids and pressures in the annulus and drill pipe, and the mud weight is raised to overbalance the bottom hole formation pressure. In addition, there are well kill procedures to circulate heavier mud into the well and remove the kick fluids safely.

If a major blow-out occurs and cannot be contained with equipment, subsea dispersant applications can be made if approved by the Federal on Scene Coordinator. Subsea applications reduce the volume and concentration of spilled oil from reaching the surface, which may minimize associated health and safety risks from VOC exposure. One major advantage of subsea dispersants over surface dispersants is the conditions in which they may be applied. Subsea dispersants may be applied in almost any condition, day or night and even in inclement weather. Considerations before applying subsea dispersants should include:

- Environmental impact/risk assessment results
- Federal on Scene Coordinator approval of the method
- EPA limits on amounts of subsea dispersant usage per day
- Characteristics of the oil being spilled
- Volume spilling from the well to determine dispersant-to-oil ratio
- Stockpiled quantity of dispersants available and ability to provide a continuing flow
- The advantages of subsea application versus surface application
- Availability of equipment and trained personnel
- Access to the well head area

Blow-out prevention methods are described below:

The BOP stack is located above the wellhead and is used on all hole sections below the surface hole. The BOP has a series of hydraulic (or manually) operated rams and annular preventers for closing in the well around the drill string or open hole, plus actuated and manual valves and kill/choke lines. The shear ram can close on the drill string and sever it to give a complete seal across the wellbore. The BOP essentially acts like a valve at the surface, containing all wellbore fluids and pressures while down hole operations are planned and executed safely. Redundancy exists in the BOP stack with additional ram preventers and valves.

The casing program is designed to allow safe well control procedures to be carried out during drilling, work over, and production operations; the cementing program isolates hydrocarbon zones, abnormally pressured formations, and lost circulation zones.

A choke manifold is a system of piping and valves for handling fluids and circulation from the wellbore in a controlled and safe manner. All valves in the system have a backup.

Degassers are used to remove gas from drill fluids circulated to the surface from the well.

The BOP stack and choke manifold have redundancy built in such that a ram, choke or valve failure will not mean a leak and potential blow-out of hydrocarbon.

All BOP equipment is rated for the pressure regimes to be encountered in the development wells and is configured regularly tested.

Murphy Exploration and Production has contractual agreements with Helix Well Containment Group. Helix is one of two specialized companies that may provide significant resources during a well blowout. Their processes and capabilities for controlling a well blowout consist of:

Well Source Control

The information contained below is a summary intended to provide guidance in the instance of a uncontrolled well blowout. For further information refer to the Responsible Party's Well Control Plan.

A layered approach should be used to respond to a deepwater well control incident that addresses simultaneous response operations at the well site, in the offshore environment and in near shore and shoreline areas. Plans should be implemented, resources deployed and response operations established within these environmental areas to accomplish the following general objectives:

Ensure the safety of responders and the general public

Intervene at the well site to stop the flow of oil

Minimize the spread of oil at the surface

Prevent shoreline impact

Protect coastal and natural resources

Subsea Well Containment

During a subsea well intervention incident resources should be simultaneously deployed to conduct site surveys, remove debris, cap the well to completely secure the source, contain and collect subsurface oil and drill a relief well. Separate and distinct resources should be made available for each part of the well containment

plan or scheduled to accommodate each part of the response. Deepwater well intervention strategies should support the overall response strategies. Specific well intervention strategies should address the following:

Source control response personnel

Stop the well flow at the sea floor as fast and safely as possible

Encounter no seafloor broaching from the well design

Permanently secure the well thereby securing the source

The responsible party should develop plans that address the following response activities.

Site Survey, Assessment and Debris Removal. Site assessment operations should be conducted to determine the extent of damage to the well, chart damaged structures and equipment and plan debris removal operations to gain safe access to the well. Initial operations could include deployment of ROVs to visually inspect the well site and produce basic information on debris location and elevation relative to the leak source. Survey information should examine:

Seabed debris field

General damage to wellhead and blow out preventer (BOP)

Integrity to connectors, risers, and subsea equipment

Access to the well to begin intervention operations

Lower Marine Riser Package (LMRP) and BOP functionality

Wellhead inclination

Seabed features that may interfere with well containment operations and equipment deployment

Appropriate and safe methods to deploy subsea intervention equipment

Capping Operations. Operations to cap the well should be developed and implemented by the RP. Initial operations should address mobilization of capping stacks or BOPs and deployment of all support equipment to the well site. Capping operations should examine:

Securing the well with a capping stack

Securing the well with a BOP

Hydraulic supplies for subsea control systems

Hydrate remediation

Accessing a damaged wellhead

Structural integrity of the well to contain pressure

Capture and Collection Operations. Subsea oil should be captured, collected and stored in surface vessels if there are any delays in capping operations. Basic plans should include the following activities:

Placing “Top Hats” or pollution collection devices over the source to capture the oil

Injecting the oil flow with methanol oil to prevent hydrocarbons from forming

Transferring the captured oil to a marine capture vessel

Processing the captured oil into gas and oil on the marine capture vessel

Venting and burning the processed gas

Transferring the processed oil to a tank vessel or barge using a floating transfer hose

RPs should have access to a range of Top Hats or containment devices that can be deployed on ships to capture subsea hydrocarbons through a riser assembly. Plans should address:

Methanol injection into the well fuel stream to mitigate the formation of gas hydrates

Processing facilities to separate the inlet full well stream into a gas phase and a liquid phase

Removal of solids

Gas Flaring

Capture vessels to store recovered oil

Relief Well Operations. Plans for drilling a relief well to stop the flow of oil or to permanently secure the well should be implemented at the beginning of a known worst case discharge and run simultaneously with all other well intervention operations.

Simultaneous Operations. Simultaneous operations (SIMOPS) is a formal written process and defined as performing two or more operations concurrently that might cause conflicts with one another in normal or emergency situations. SIMOPS

should be coordinated to ensure safe and efficient operations between all marine and subsea assets deployed in support of the incident. SIMOPS plans should:

Identify the SIMOPS hierarchy and priorities for the major scopes of work between surface oil spill response, all well control and intervention operations and safety and monitoring operations.

Outline high-level SIMOPS decision-making steps and provide detailed SIMOPS process and procedures to follow by all responders.

Provide a detailed communications plan to ensure that all responders understand and abide by SIMOPS requirements.

RPs should have the organizational capability, through company personnel, contractors, and consultants or through mutual aid agreements to effectively and safely implement well intervention plans. This includes developing an organizational structure to manage the many facets of a subsea well incident. That organizational structure should follow ICS principals and can be designated a separate command system or fall within an RPs existing ICS.

Well Containment Plan

The Well Containment Plan outlines the response to a complete loss of well control while drilling the subject well and the planned operations to contain the well. Use of and reference to well containment plans are strictly limited to those entities that are a signatory to a Well Containment Plan through Marine Well Containment Company (MWCC) or Helix Well Containment Group (HWCG) All operations proposed under the Well Containment Plan will comply with BSEE regulations.

The Well Containment Plan describes source control and containment operation only. Surface clean up, dispersant application, in-situ burn are described in the Oil Spill Response Plan. The following discussion will make references to the Plan.

Equipment

Helix Well Containment Group

Capability

Water Depths up to 8,000 ft

Processing Capability

55,000 bbls of oil per day

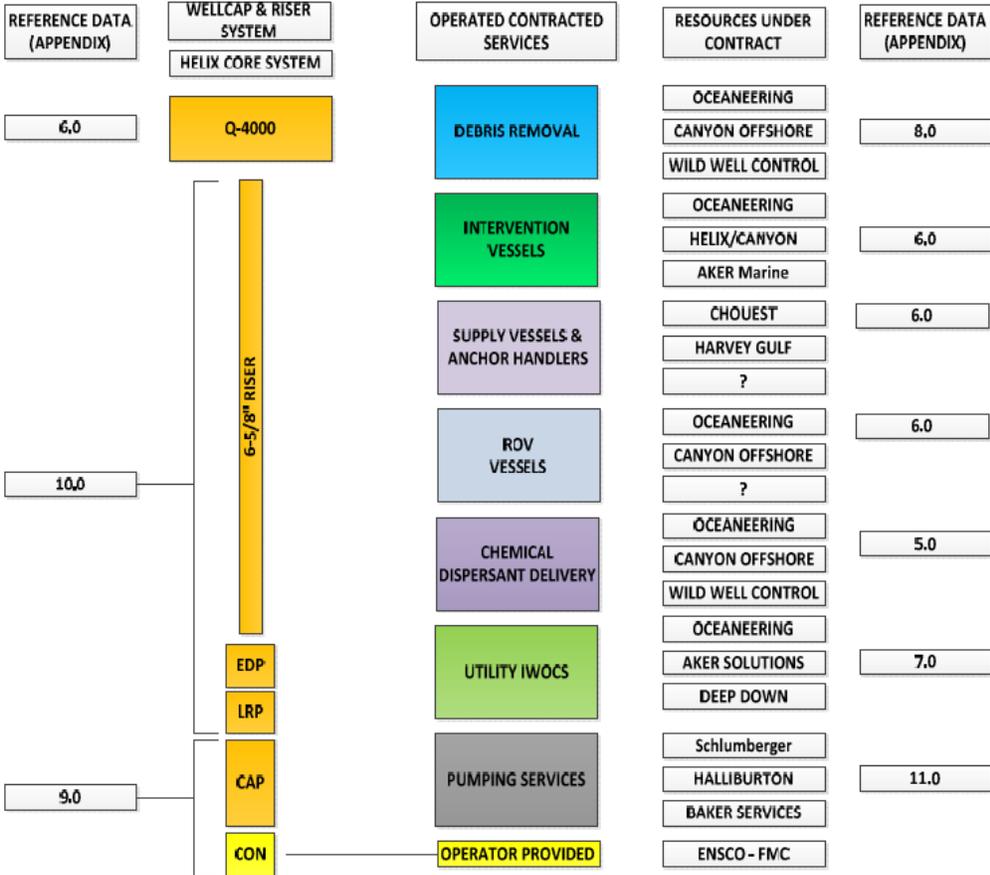
70,000 bbls of liquid per day

95 million standard cubic feet of gas per day

10k psi dual ram capping stack

15k psi dual ram, two outlet capping stack

The diagram below shows the equipment supplied by Helix and the equipment that is the operator's responsibility. CON is the operator provided connector that may be required to attach the capping stack to the LMRP, BOP, or well head.



Marine Well Containment Company- (This company does not represent Murphy Exploration & Production)

Capabilities

Depth up to 10,000 ft

Processing Capabilities

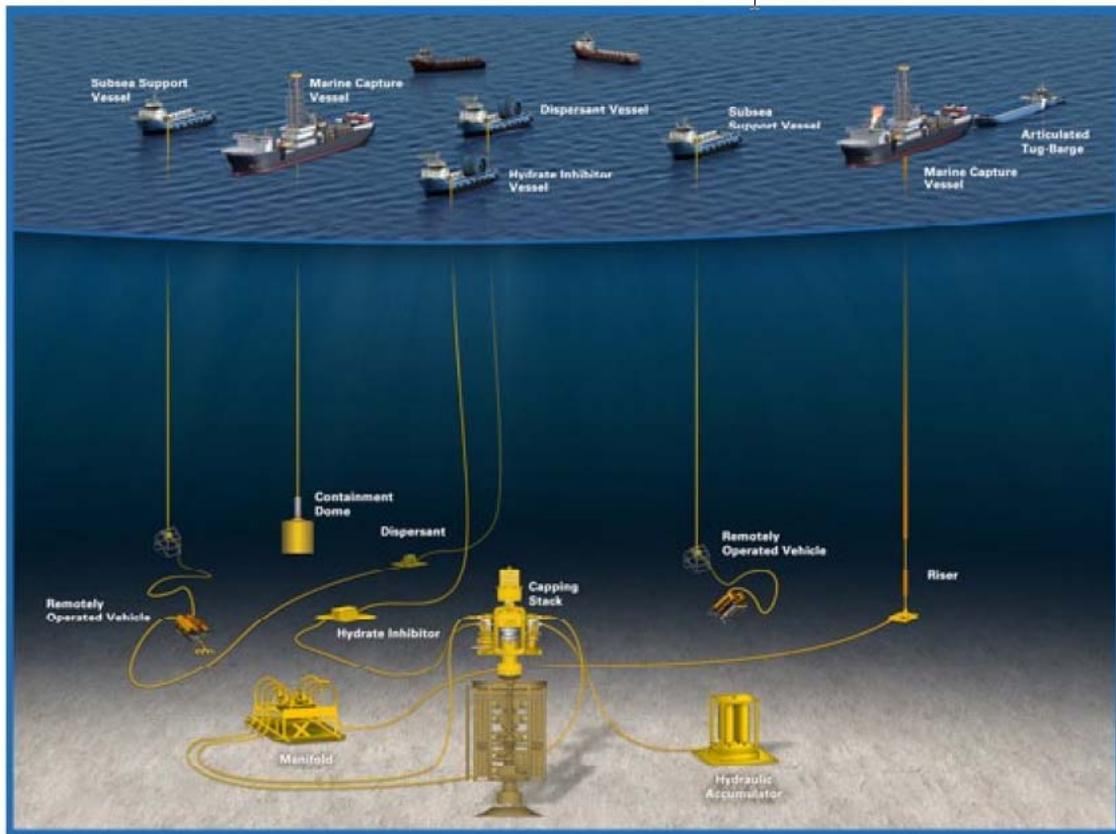
100,000 bbls of oil per day

200 million standard cubic feet of gas (flaring)

15k psi single ram capping stack

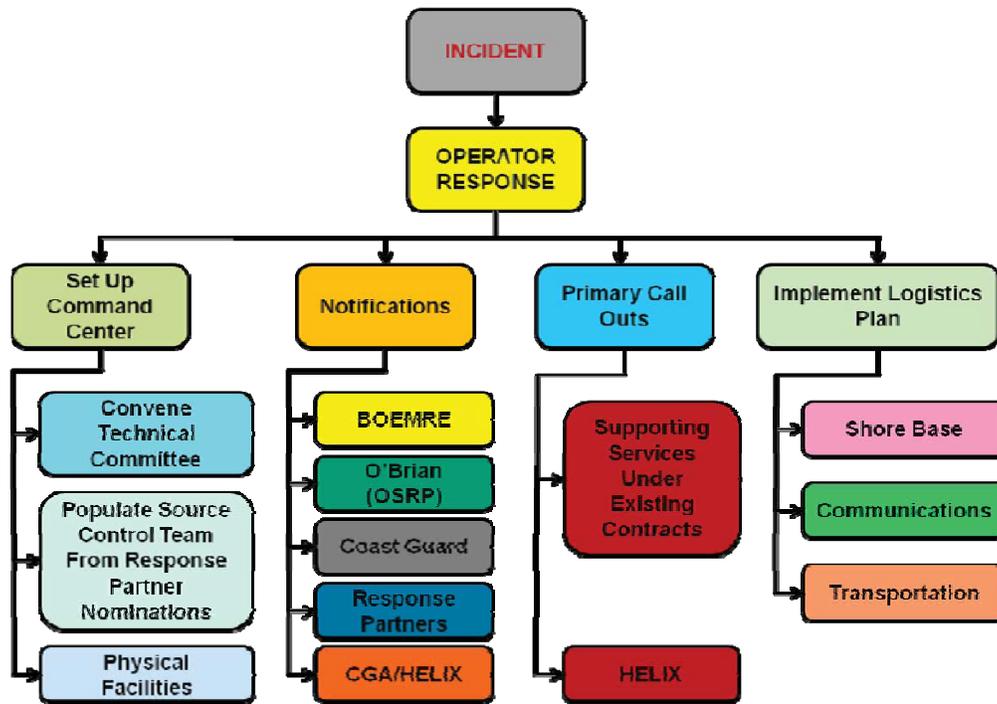
15k psi three ram stack

The diagram below shows the equipment supplied by MWCC and the equipment that is the operator's responsibility.



Activation

In the event of a blowout, the source control response is the responsibility of the Operator. The Operator will coordinate source control activities presented below. This organization structure builds on the established industry structure currently in place under the operator's OSRP.

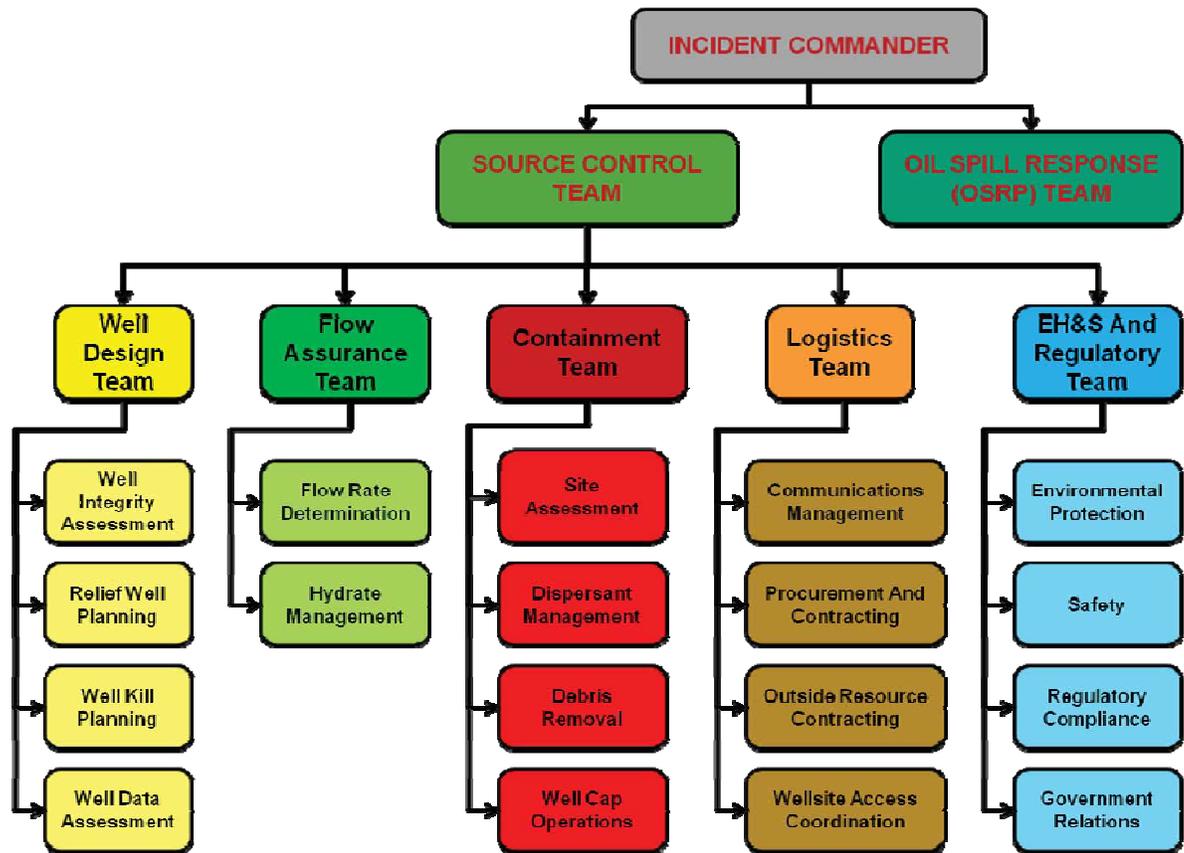


Source Control Response Structure

Notifications to OSROs, Helix, MWCC, regulatory authorities, and support contractors regarding source control are the responsibility of the well operator.

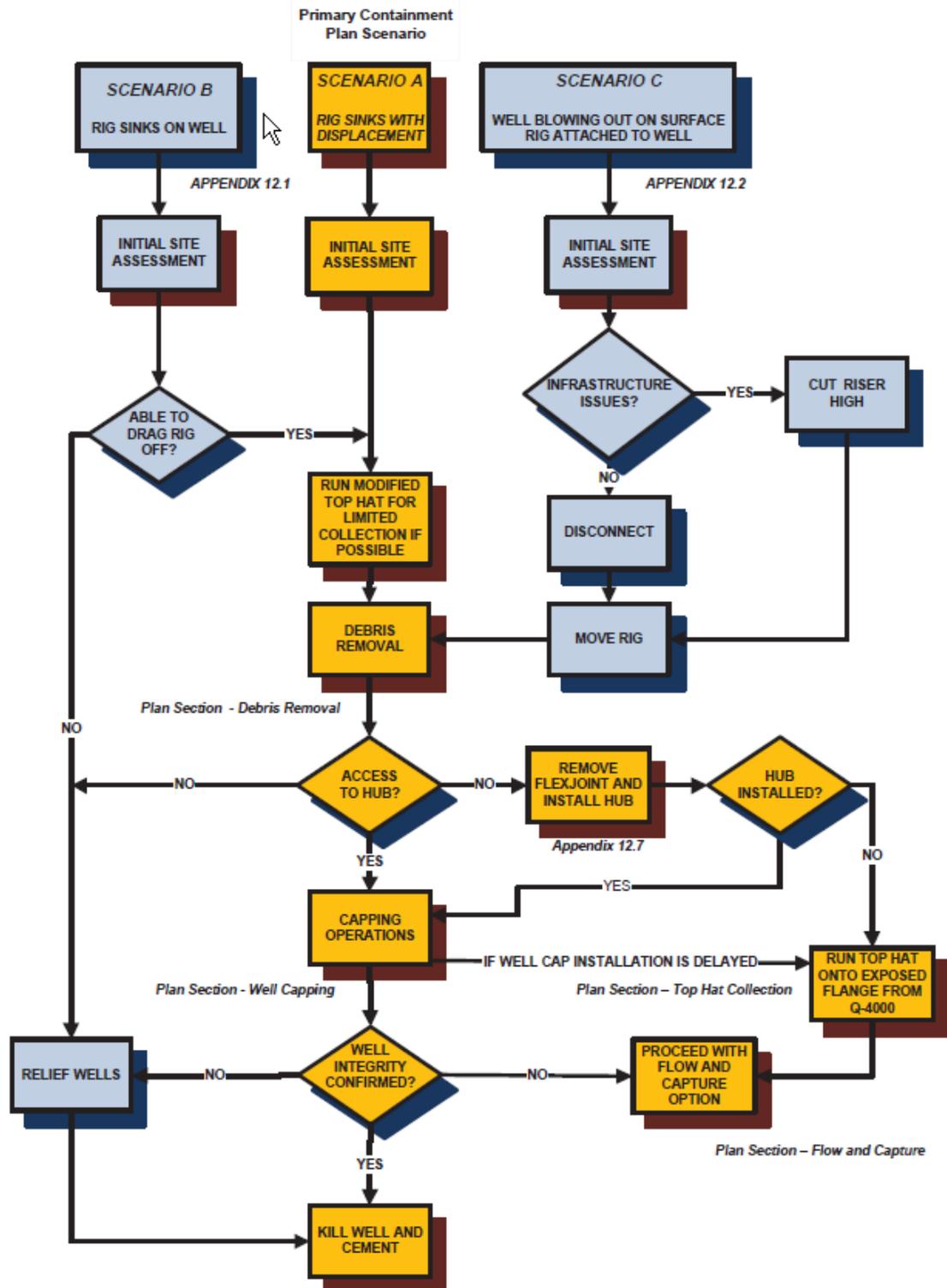
Equipment and contract services outside of the well containment contractor are contracted directly by the operator of the well. Each operator has agreements with multiple service companies to ensure availability. The applicable service companies under contract are reflected in the Plan and are referenced in the contractor call out list in *Appendix 3.2 – Identified Contractors, Services and Equipment* of the applicable Well Containment Plan

The Well Containment Response will be organized as part of the operator’s emergency response organization for source control. The charts below shows one possible organizational structure for source control. Federal personnel will be involved in various roles in the Source Control Team. USCG will act as FOSC (Representative) and BSEE will provide a direct advisory role to the FOSC and review all source control operation plans. BSEE, NOAA, USGS, and USCG will participate in the Flow Rate Determination group.



For MODU operations, the three likely blowout scenarios considered for the Relief Well Plan (RWP) require similar source control equipment. The three blowout scenarios are:

Scenario Description		
Scenario A	Scenario B	Scenario C
Well blows out, Rig sinks with displacement	Well blows out, Rig sinks and comes to rest on the Well	Well blows out, Rig stays afloat and attached to the Well

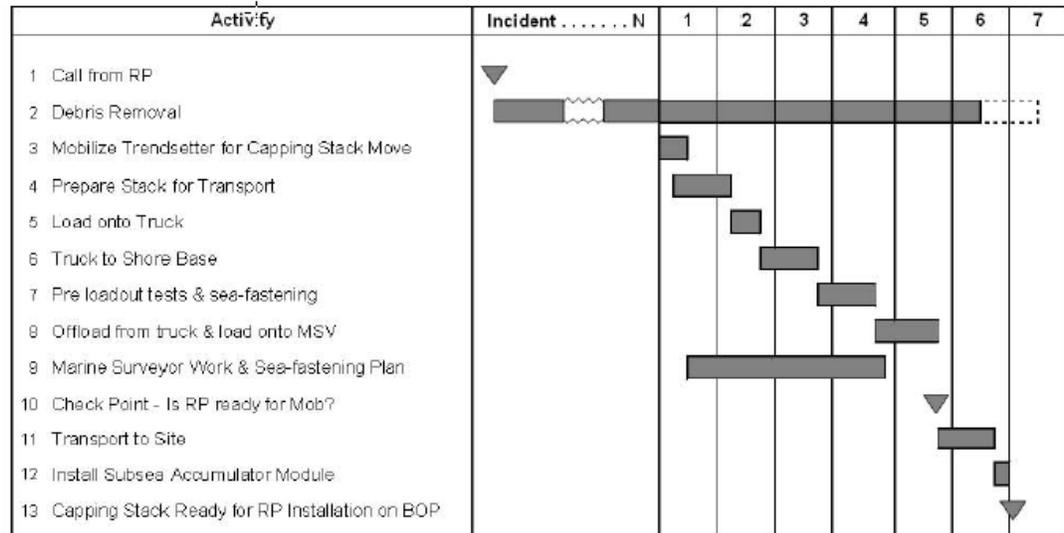


Helix WCG Containment Scenario Flowchart

Deployment

The diagrams below depict a generic deployment scenario for both companies.

Marine Well Containment Company



General Assumptions:

- No weather or mechanical downtime
- Distance from shore base to location – 1 day
- Transport Permit in 3 days & transport allowed at night
- No VOC (volatile organic compounds) /LEL (lower explosive limit) issues
- <8000 ft water depth

Responsible Party Assumptions:

- Debris & LMRP removal off CP (Critical Path)
- BOP mandrel confirmed suitable for H4 connector/undamaged/single discharge point
- Shore base & cranes available
- Installation vessel available
- HIS (Hydrate Inhibition System), Dispersant, ROV Tools available and off CP
- Marine Survey/Sea Fastening Plan - 3 days

Helix Well Containment Group

The Helix Well Containment Group (HWCG) is a combination of the Helix Fast Response System (HFRS) and the “common” equipment and services. Twenty Clean Gulf Associates (CGA) member companies entered into utilization agreements with Helix for access to their fast response subsea well containment and well shut-in equipment as described in the agreement. CGA, on behalf of the participating companies, agreed to serve as the administrative conduit between CGA participating companies and Helix while serving as the single-point receiver of member dues and payment of fees due to Helix. By contractual agreement and upon notification from a member company, the Helix fast response equipment will be released from its existing commitments (intervention or production operations) to respond to a well blowout incident.

The HFRS is the primary core equipment and services for the response. The member companies have independent contracts and/or agreements for additional equipment and services that can be accessed during a response. The “common” resources are a critical part of the response capabilities, thereby, being an inclusive part of the core equipment and services.

HWCG has a 10kpsi Capping Stack that can be installed from an intervention vessel, ROV assisted AHTV, or an appropriate drilling rig. It is stored in a “ready for deployment mode” (RFDM) at Helix’s facility in Ingleside, Texas. The cap is stored on a test stump with the sling assembly to run the cap. In this mode, the Capping Stack will be functioned annually, inspected by BOEMRE annually, and pressure tested quarterly.

The Helix Well Containment Group is in the process of implementing plans to make a 15K Capping Stack available.

HWCG’s Top Hat can be installed from an intervention vessel or an appropriate MODU. The Top Hat is designed to be deployed over the flex joint flange to capture flow. However, a Top Hat is a non-sealing connection that can be modified to capture flow from the well in various ways to reduce VOCs or contain flow while preparing to deploy primary containment equipment. A Top Hat can also be deployed if the LMRP or BOP could not be removed or a seal could not be achieved. The Top Hat is designed with a J-latch assembly for riser removal, methanol injection ports, dispersant injection ports, ROV operated diverter valves, and has a pressure gauge.

The Deepwater Intervention Technical Committee (DITC) is comprised of representatives from each member company within the HWCG. Upon notification of an incident by the Operator, the chairperson of the DITC will facilitate communication to all DITC members to proceed to the affected Operator’s command center to aid the Source Control Team by supplying human capital in an advisory role, as deemed appropriate by the Operator for the specific source control response. The members of the technical committee will be directed by the Operator’s Source Control Team during source control planning and operations. The technical committee brings engineering and operational expertise from the

HWCG member companies that reflect multi-disciplinary experience in well construction (drilling, completions, work over, and abandonment), subsea infrastructure controls and equipment, and floating surface facilities for both Mobile Offshore Drilling Units (MODUs) and production installations. Contingent upon the specific response requirements, member companies will offer up individuals, in addition to or in lieu of the DITC members, as deemed appropriate for the specific response to work as directed by the Operator's Source Control Team. This vast array of human assets represents a cross-section of the entire oil industry, both from an operator and contractor or vendor perspective.

Marine Well Containment Group

MWCC is an industry established group developed to provide a common solution for Gulf of Mexico Exploration and Production operators to meet the crisis resulting from a well blowout. The response is centered around the use of MWCC provided marine vessels and subsea containment equipment. Procedures and service support agreements to utilize this system during a response have been jointly developed by industry operators located in the Gulf of Mexico. All operations proposed under the Well Containment Plan will comply with BOEMRE regulations.

The MWCC has an interim containment solution based on utilization of two drilling rigs on long term contract to Chevron and one drilling rig that is on long term contract to BP. In addition to these vessels, MWCC will make available a 15k psi rate capping stack and riser system, hydrate inhibitor systems, subsea dispersant injection systems and other ancillaries. Further detail of the containment system can be found in the MWCC Well Containment Supplement and procedure which describe how the system will be mobilized and deployed. The MWCC member companies have independent contracts and/or agreements for additional equipment and services that can be accessed during a response. The "common" resources are a critical part of response capabilities, thereby, being an inclusive part of the core equipment and services. By contractual agreement and notification from the responsible party, the MWCC containment system will be released from its existing commitments to respond to a well blowout incident

Contingent upon the specific response requirements, MWCC member companies will offer up individuals, as deemed appropriate from the specific response to work as directed by the operators Source Control Team

The information provided here is more thoroughly detailed in each company's Well Control Plan

9440.2 Outer Continental Shelf Worst Case Discharge (WCD) Data

COTP Zone: Mobile Alabama

Color coded 'distance to shore' data: Red = <50 miles; Yellow = 50-100 miles; Green = >100 miles

No.	Company	OSRP Number	Area	Block	Miles to Shore	Volume (bbls)	County/Parish highest Risk of Impact	OSRAM % chance of impact 3/10/30	COTP Zone	Lat (Dec Deg)*	Long (Dec Deg)*
1	Apache Deepwater	O-685	MC	983	66	475,731	Plaquemines LA	-/4/8	Morgan City	29.338889	-90.338889
2	Shell Offshore Inc.	O-309	MC	807	53	458,867	Plaquemines LA	-/4/8	Morgan City	28.169444	-89.222778
3	ExxonMobil Production Company	O-129	MC	211	52	426,406	Plaquemines LA	4/14/21	Morgan City	28.800642	-88.257843
4	Anadarko Petroleum Corporation	O-016	GC	683	120	410,000	Cameron / Plaquemines	-/-/3	Morgan City	27.273889	-90.827222
5	Freeport-McMoRan Oil & Gas LLC	O-713	GC	393	96.5	400,000	Cameron LA	-/-/5	Morgan City	27.592479	-89.931196
6	Shell Offshore Inc.	O-309	MC	391	70	396,200	Plaquemines LA	4/14/21	Morgan City	28.618817	-87.999717
7	Murphy Exploration & Production Company - USA	O-629	DC	178	75	394,475	Plaquemines LA	-/2/9	Mobile	28.803422	-87.835210
8	Shell Offshore Inc.	O-505	DC	799	110	351,000	Plaquemines LA	-/2/8	Mobile	28.208639	-88.578111
9	Eni US Operating Co. Inc.	O-624	DC	753	101.8	348,417	Plaquemines LA	-/2/8	Mobile	28.215886	-87.694000
10	Corporation	O-458	DC	490	95	347,431	Plaquemines LA	-/2/9	Mobile	28.466111	-87.621389
11	Murphy Exploration & Production Company - USA	O-521	MC	600	53	335,032	Plaquemines LA	-/5/11	Morgan City	28.393993	-88.580414
12	BP AMERICA INC.	O-553	MC	776	66	300,000	Plaquemines LA	-/5/11	Morgan City	28.205348	-88.564115
13	Marathon Oil Company	O-559	DC	757	110	300,000	Plaquemines LA	-/2/8	Mobile	28.226951	-87.508312
14	BP AMERICA INC.	O-553	MC	778	68	293,000	Plaquemines LA	-/5/11	Morgan City	28.190617	-88.495583
15	Eni US Operating Co. Inc.	O-577	KC	129	168	280,052	Cameron, LA	-/-/4	Morgan City	26.852200	-91.914700
16	Statoil USA E&P Inc.	O-643	MC	718	47	276,880	Plaquemines LA	-/4/8	Morgan City	28.233450	-89.244503
17	Noble Energy, Inc.	O-523	MC	699	80	265,500	Plaquemines LA	-/5/11	Morgan City	28.141022	-88.036369
18	BHP Billiton Petroleum (Americas) Inc.	O-043	GC	610	120	255,200	Cameron / Plaquemines	-/-/3	Morgan City	27.342219	-90.097552
19	Chevron Corporation	O-421	KC	785	210	242,027	Galveston/Matagorda/Cameron	-/-/2	Morgan City	26.215774	-92.112200
20	Statoil Gulf Properties Inc.	O-704	DC	231	105.43	241,000	Plaquemines LA	-/2/9	Mobile	28.757376	-88.405579
21	Stone Energy Corporation	O-320	MC	449	30	230,098	Plaquemines LA	6/13/16	Morgan City	28.510933	-89.537908
22	Hess Corporation	O-008	GB	386	130	228,936	Cameron LA	-/1/9	Morgan City	27.475732	-90.805650
23	LLOG Exploration Offshore, L.L.C.	O-206	MC	547	38.4	225,144	Plaquemines LA	-/4/8	Morgan City	28.441791	-89.046153
24	Energy Resource Technology GOM, Inc.	O-647	GC	237	91	212,891	Cameron LA	-/1/7	Morgan City	27.710556	-91.110278
25	Chevron Corporation	O-421	GC	641	118	186,452	Cameron/Plaquemines	-/-/3	Morgan City	27.330000	-90.710000
26	Marathon Oil Company	O-210	MC	993	73	179,697	Plaquemines LA	-/5/11	Morgan City	27.979309	-88.725207
27	EPL Oil & Gas, Inc.	O-115	ST	125	23	175,000	Terrebonne LA	3/8/10	Morgan City	28.740866	-90.232251
28	Corporation	O-370	EW	834	64	169,488	Cameron LA	-/1/7	Morgan City	28.160338	-89.948343

29	Fieldwood Energy LLC	O-709	SM	41	49.9	161,487	Cameron, LA	1/13/21	Morgan City	28.795131	-92.076038
30	Offshore, LLC	O-665	SM	41	49.9	161,487	Cameron LA	1/13/21	Morgan City	28.776234	-92.095476
31	Eni US Operating Co. Inc.	O-577	MC	546	38	158,261	Plaquemines LA	-/4/8	Morgan City	28.425304	-89.067458
32	Marathon Oil Company	O-210	GB	515	140	154,400	Cameron LA	-/1/9	Port Arthur	27.464308	-92.433147
33	Deep Gulf Energy LP	O-578	MC	215	64.5	154,347	Plaquemines LA	4/14/21	Morgan City	28.793585	-88.043826
34	ConocoPhillips Company	O-269	MC	637	46	151,015	Plaquemines LA	-/4/8	Morgan City	28.346688	-88.925569
35	ATP Oil & Gas Corporation	O-030	MC	710	49	143,374	Plaquemines LA	-/4/8	Morgan City	28.255461	-89.660418
36	Bennu Oil & Gas, LLC	O-710	MC	941	70	133,581	Plaquemines LA	-/4/8	Morgan City	28.033611	-89.100278
37	Petrobras America Inc.	O-262	MC	697	77	132,975	Plaquemines LA	-/5/11	Morgan City	28.300070	-88.126960
38	Corporation	O-370	HI	362	107	132,688	Matagorda, TX	-/7/15	Houston-Galveston	27.992525	-93.803987
39	EPL Oil & Gas, Inc.	O-115	HI	A362	108	132,668	Matagorda TX	-/7/15	Houston-Galveston	27.992500	-93.803889
40	BHP Billiton Petroleum (Americas) Inc.	O-043	GC	653	120	123,656	Cameron / Plaquemines	-/-/3	Morgan City	27.300556	-90.135000
41	LLC	O-678	SM	152	85	120,000	Cameron LA	-/4/13	Morgan City	28.202203	-92.110118
42	LLC	O-451	VR	284	77	103,718	Cameron LA	-/4/13	Port Arthur	28.414784	-92.488958
43	L.P.	O-663	GC	896	136.5	101,000	Cameron LA	-/-/4	Morgan City	27.061723	-91.182284
44	EPL Oil & Gas, Inc.	O-115	WD	27	6.36	97,000	Plaquemines LA	16/22/23	New Orleans	29.134132	-89.542311
45	Murphy Exploration & Production Company - USA	O-629	DC	4	76	96,020	Plaquemines LA	-/2/9	Mobile	28.943936	-87.725619
46	Apache Corporation	O-021	SM	281	24	95,855	Cameron LA	8/24/27	Morgan City	29.065833	-91.872222
47	Chevron Corporation	O-421	ST	37	8	85,945	Terrebonne LA	13/18/20	Morgan City	28.940000	-90.370000
48	Tarpon Operating & Development, L.L.C.	O-436	WC	661	124	85,925	Galveston TX	-/4/12	Port Arthur	0.000000	0.000000
49	McMoRan Exploration Co.	O-215	MP	299	14.8	80,034	Plaquemines LA	11/25/31	New Orleans	29.265556	-88.759444
50	GCER Offshore, LLC	O-688	GI	82	30	77,340	Terrebonne LA	3/8/10	Morgan City	28.690488	-89.973710
51	Apache Corporation	O-021	HI	A376	114	76,960	Matagorda TX	-/7/15	Houston-Galveston	27.933611	-93.669444
52	Fieldwood Energy LLC	O-709	HI	A376	114	76,960	Matagorda TX	-/7/15	Houston-Galveston	27.933611	-93.669444
53	Stone Energy Corporation	O-320	WC	176	26	73,679	Cameron LA	27/41/43	Port Arthur	29.378739	-93.035369
54	Contango Operators, Inc.	O-575	EI	260	50	68,986	Cameron LA	-/7/16	Morgan City	28.478171	-91.474189
55	LLC	O-701	EI	133	35	68,516	Cameron LA	-/7/16	Morgan City	28.976440	-91.850289
56	W & T Offshore, Inc.	O-367	SS	349	68	63,800	Cameron LA	-/3/11	Morgan City	28.061429	-91.061784
57	Inc.	O-590	GC	155	85	61,000	Cameron LA	-/-/5	Morgan City	27.810278	-90.785556
58	EPL Oil & Gas, Inc.	O-115	WD	27	6.36	60,982	Plaquemines LA	16/22/23	New Orleans	29.121389	-89.547222
59	Hess Corporation	O-008	MC	724	55	60,760	Plaquemines LA	-/4/8	Morgan City	28.234561	-88.995358
60	Byron Energy, LLC	O-706	SM	6	35.7	58,297	Vermilion LA	16/22/23	Morgan City	28.979179	-92.008963
61	LLC	O-451	BS	25	3.5	57,200	Plaquemines LA	11/25/31	New Orleans	29.541111	-88.989722
62	Corporation	O-016	GC	680	120	53,233	Cameron LA	-/-/4	Morgan City	27.292222	-90.968056
63	Repsol E&P USA Inc.	O-608	WR	365	170.4	51,929	Cameron LA	-/-/3	Morgan City	26.605764	-91.287483
64	Energy XXI GOM, LLC	O-555	WD	73	17.4	44,066	Plaquemines LA	16/22/23	Morgan City	28.947222	-89.706667

65	Energy Resource Technology GOM, Inc.	O-647	GC	282	91	43,280	Cameron LA	-/1/7	Morgan City	27.698889	-91.045000
66	Energy XXI GOM, LLC	O-555	GI	23	6.8	42,583	Terrebonne LA	13/18/20	Morgan City	29.100556	-89.994444
67	Targa Midstream Services Limited Partnership	O-108	WD	79	4.3	40,183	Plaquemines LA	16/22/23	New Orleans	28.972222	-89.513889
68	Targa Midstream Services Limited Partnership	O-108	ST	151	31.1	40,183	Terrebonne LA	3/8/10	Morgan City	29.093056	-89.758056
69	LLOG Exploration Offshore, L.L.C.	O-206	MC	547	38	35,450	Plaquemines LA	-/4/8	Morgan City	28.415389	-89.016194
70	LLC	O-678	VR	356	78	34,319	Cameron LA	-/4/13	Morgan City	28.150000	-92.180833
71	ExxonMobil Production Company	O-129	KC	964	217	29,815	Matagorda/Cameron	-/-/2	Morgan City	26.035896	-91.987868
72	Murphy Exploration & Production Company - USA	O-521	MC	736	67	29,220	Plaquemines LA	-/5/11	Morgan City	28.275928	-88.366797
73	Flextrend Development Company, L.L.C.	O-507	HI	A5	0	28,304	Galveston TX	17/34/35	Houston-Galveston	29.135278	-93.998889
74	BP AMERICA INC.	O-553	SP	89	9.99	28,033	Plaquemines LA	6/13/16	Morgan City	28.697667	-89.396667
75	Castex Offshore, Inc.	O-653	PL	18	13	27,291	Terrebonne LA	13/18/20	Morgan City	28.877389	-90.638264
76	Corporation	O-370	WD	107	20	26,879	Plaquemines LA	16/22/23	Morgan City	28.876944	-89.535833
77	Ankor Energy LLC	O-654	SS	290	57	26,222	Cameron LA	-/3/11	Morgan City	28.280709	-91.076124
78	Arena Offshore, LP	O-512	ST	151	30	26,156	Terrebonne LA	3/8/10	Morgan City	28.616111	-90.269341
79	Noble Energy, Inc.	O-523	MC	292	38.5	25,384	Plaquemines LA	4/14/21	Morgan City	28.701389	-88.595833
80	Deep Gulf Energy LP	O-578	MC	771	54	25,224	Plaquemines LA	-/5/11	Morgan City	28.241622	-88.827411
81	Ankor Energy LLC	O-654	SS	290	57	25,031	Cameron LA	-/3/11	Morgan City	28.259167	-91.060889
82	McMoRan Exploration Co.	O-215	ST	144	35	24,605	Terrebonne LA	3/8/10	Morgan City	28.600031	-90.561631
83	Freeport-McMoRan Oil & Gas LLC	O-713	GC	645	120	24,487	Cameron/Plaquemines	-/-/3	Morgan City	27.321222	-90.535472
84	Arena Offshore, LP	O-512	HI	A546	101	24,235	Matagorda TX	-/7/15	Houston-Galveston	28.014864	-93.955647
85	EL PASO EASTERN PIPELINE GROUP	O-525	SS	144	40	20,000	Cameron LA	-/7/16	Morgan City	29.012022	-90.794453
86	Stone Energy Corporation	O-320	SS	44	1	19,300	Terrebonne LA	8/12/13	Morgan City	29.056667	-90.806944
87	Linder Oil Company, A Partnership	O-204	WC	168	25	18,678	Cameron LA	27/41/43	Port Arthur	29.407111	-93.404972
88	Arena Offshore, LP	O-512	EI	338	65	18,514	Cameron LA	-/3/11	Morgan City	28.196111	-91.666667
89	Petrobras America Inc.	O-262	WR	206	165	18,135	Galveston/Cameron/Plaquemines	-/-/2	Morgan City	26.737778	-90.483333
90	Petrobras America Inc.	O-262	GB	244	134	18,000	Cameron LA	-/1/9	Port Arthur	27.735278	-92.740278
91	Kinetica Partners, LLC	O-708	SS	198	40	17,091	Cameron LA	-/7/16	Morgan City	28.573181	-91.269214
92	EL PASO EASTERN PIPELINE GROUP	O-525	SS	198	40	17,000	Terrebonne LA	1/6/7	Morgan City	28.726292	-90.992186
93	Corporation	O-458	DC	490	95	16,686	Plaquemines LA	-/2/9	Mobile	28.466111	-87.621389
94	Castex Offshore, Inc.	O-653	HI	176	24	16,561	Galveston TX	17/34/35	Houston-Galveston	29.181722	-94.369861

95	Century Exploration New Orleans, LLC	O-554	SS	150	26	15,841	Cameron LA	-7/16	Morgan City	28.722848	-91.263559
96	White Marlin Operating Company, LLC	O-417	MI	629	5.7	15,475	Calhoun TX	26/30/30	Corpus Christi	28.054717	-96.721383
97	Conn Energy, Inc.	O-088	WC	171	25.3	14,200	Cameron LA	27/41/43	Port Arthur	29.391059	-93.258581
98	Kinetica Partners, LLC	O-708	SS	144	5	14,091	Cameron LA	-7/16	Morgan City	29.012022	-90.794453
99	Plains Pipeline, L.P.	O-601	EI	21	0	13,695	Vermilion LA	3/13/15	Morgan City	29.565056	-91.545972
100	Plains Pipeline, L.P.	O-601	EI	51	18	13,695	Vermilion LA	3/13/15	Morgan City	29.237389	-91.684917
101	Whistler Energy II, LLC	O-707	GC	18	79	13,127	Cameron LA	-1/7	Morgan City	27.943722	-91.029083
102	EPL Oil & Gas, Inc.	O-115	WD	41	15	12,836	Plaquemines LA	16/22/23	gan City/New Orle	29.093333	-89.751389
103	Williams Field Services Company	O-376	AC	857	142	12,830	Matagorda TX	-1/10	Corpus Christi	26.111944	-94.918056
104	Bois d'Arc Exploration LLC	O-686	SS	170	29.5	12,495	Terrebonne LA	1/6/7	Morgan City	28.636944	-91.067222
105	Ltd.	O-658	VR	282	79.5	12,152	Cameron LA	-4/13	Port Arthur	28.410816	-92.615607
106	Apex Oil & Gas, Inc.	O-022	EC	23	6.11	12,000	Cameron, LA	27/41/43	Port Arthur	29.526735	-92.753894
107	Inc.	O-590	GC	155	85	12,000	Cameron LA	-1/5	Morgan City	27.810278	-90.785556
108	Apache Corporation	O-021	ST	308	60	11,846	Cameron LA	-3/11	Morgan City	28.161389	-90.227778
109	Fieldwood Energy LLC	O-709	ST	308	60	11,846	Plaquemines LA	-3/6	Morgan City	28.161389	-90.227778
110	Offshore, LLC	O-665	GC	65	89	11,636	Cameron LA	-1/7	Morgan City	27.883056	-90.901389
111	Peregrine Oil & Gas II, LLC	O-637	EI	331	73.4	11,600	Cameron LA	-3/11	Morgan City	28.224171	-91.741624
112	W & T Offshore, Inc.	O-367	MC	800	52	11,300	Plaquemines LA	-4/8	Morgan City	28.143056	-89.553056
113	Peregrine Oil & Gas, LP	O-564	HI	268	81	11,000	Matagorda TX	-7/15	Houston-Galveston	28.411327	-93.887918
114	Enbridge Offshore (Gas Gathering) L.L.C.	O-572	GC	613	108	10,958	Cameron/Plaquemines	-1/3	Morgan City	27.370000	-89.924167
115	Contango Operators, Inc.	O-575	VR	170	41.7	10,862	Cameron LA	1/13/21	Morgan City	28.921603	-92.226900
116	Nexen Petroleum Offshore U.S.A. Inc.	O-097	GC	243	91	10,509	Cameron LA	-1/5	Morgan City	27.711944	-90.790278
117	ANR Pipeline Company	O-609	WC	33	3	10,160	Cameron LA	27/41/43	Port Arthur	29.193889	-93.032222
118	ANR Pipeline Company	O-609	WC	167	26	10,160	Cameron LA	27/41/43	Port Arthur	29.387500	-93.440833
119	Petrobras America Inc.	O-262	WR	249	168	10,120	Galveston/Cameron/Plaquemines	-1/2	Morgan City	26.696111	-90.508333
120	Shell Offshore Inc.	O-309	WD	143	10	10,100	Lafourche LA	13/15/16	Morgan City	28.661944	-89.550000
121	Cochon Properties, LLC	O-694	EI	18	3	10,000	Terrebonne LA	8/12/13	Morgan City	29.368056	-91.504722
122	Century Exploration New Orleans, LLC	O-554	BS	45	2	9,850	Plaquemines LA	11/25/31	New Orleans	29.464444	-89.163056
123	LLC	O-451	VR	284	77	9,826	Cameron, LA	-4/13	Port Arthur	28.414788	-92.488964
124	Tarpon Operating & Development, L.L.C.	O-436	WC	661	124	9,748	Galveston TX	-4/12	Port Arthur	0.000000	0.000000
125	Energy XXI GOM, LLC	O-555	GI	23	6.8	9,442	Terrebonne LA	13/18/20	Morgan City	29.100556	-89.994444
126	ConocoPhillips Company	O-269	GB	783	149	9,358	Cameron LA	-1/6	Morgan City	27.203889	-92.202500
127	Renaissance Offshore, LLC	O-689	SS	219	39	8,561	Cameron LA	-7/16	Morgan City	28.506944	-91.101944

128	Flextrend Development Company, L.L.C.	O-507	HI	A5	40	8,500	Galveston TX	17/34/35	Houston-Galveston	29.133611	-93.997778
129	Energy XXI GOM, LLC	O-555	WD	73	17.4	8,465	Plaquemines LA	16/22/23	Morgan City	28.947222	-89.706667
130	Williams Field Services Company	O-376	MP	44	5	8,320	Plaquemines LA	11/25/31	New Orleans	29.391667	-89.133333
131	Statoil Gulf Properties Inc.	O-704	DC	231	105.43	8,207	Plaquemines LA	-/2/9	Mobile	28.757376	-88.405579
132	Rooster Petroleum, LLC	O-604	VR	376	87	7,827	Cameron LA	-/4/13	Morgan City	28.098538	-92.234005
133	Chevron Corporation	O-421	ST	37	8	7,607	Terrebonne LA	13/18/20	Morgan City	28.940000	-90.340000
134	Black Elk Energy Offshore Operations, LLC	O-650	VR	408	108	7,301	Cameron LA	-/4/13	Port Arthur	27.969346	-92.527830
135	Rooster Petroleum, LLC	O-604	HI	141	17	7,151	Galveston TX	17/34/35	Houston-Galveston	29.352944	-88.885417
136	GCER Offshore, LLC	O-688	ST	121	1.65	7,139	N/A	N/A	Morgan City	0.000000	0.000000
137	Apache Corporation	O-711	MP	67	2	6,917	Plaquemines LA	11/25/31	New Orleans	29.248611	-89.087222
138	L.L.C.	O-569	WD	54	3	6,822	Plaquemines LA	16/22/23	New Orleans	29.013753	-89.394892
139	PetroQuest Energy, L.L.C.	O-409	SS	72	6	6,792	Terrebonne LA	8/12/13	Morgan City	28.972000	-90.964000
140	Contango Operators, Inc.	O-575	EI	11	7.2	6,730	Vermilion LA	3/13/15	Morgan City	29.378944	-91.752917
141	L.L.C.	O-340	SM	257	21	6,621	Cameron LA	8/24/27	Morgan City	29.215278	-92.010000
142	Black Elk Energy Offshore Operations, LLC	O-650	ST	8	1	6,174	Terrebonne LA	13/18/20	Morgan City	29.067500	-90.673056
143	Panther Interstate Pipeline Energy, LLC	O-570	GA	256	19	5,726	Matagorda TX	10/26/28	Houston-Galveston	29.000000	-94.720000
144	LLOG Exploration Offshore, L.L.C.	O-206	WC	31	1.7	5,710	Cameron LA	27/41/43	Port Arthur	29.737500	-93.098056
145	Ridgelake Energy, Inc.	O-285	EI	303	67	5,617	Cameron LA	-/3/11	Morgan City	28.308431	-91.443869
146	L.P.	O-616	MI	560	4.75	5,510	Calhoun TX	26/30/30	Corpus Christi	28.274722	-96.380333
147	Columbia Gulf Transmission Company	O-085	EC	23	1	5,347	Cameron LA	27/41/43	Port Arthur	29.565917	-92.754583
148	Williams Gas Pipeline	O-670	HI	154	9	5,017	Galveston TX	17/34/35	Houston-Galveston	29.237778	-94.422500
149	Century Exploration New Orleans, LLC	O-554	BS	45	2	4,788	Plaquemines LA	11/25/31	New Orleans	29.464444	-89.163056
150	LLC	O-679	GC	52	86	4,700	Cameron LA	-/1/7	Morgan City	27.899444	-91.510278
151	L.L.C.	O-340	SS	47	2.3	4,657	Cameron LA	-/4/13	Morgan City	0.000000	0.000000
152	Rooster Petroleum, LLC	O-604	EC	36	6	4,603	Cameron LA	27/41/43	Port Arthur	29.493288	-92.639715
153	Atinum Energy, Inc.	O-677	MU	746	10.7	4,374	Kleberg TX	13/21/22	Corpus Christi	27.756567	-96.982000
154	PetroQuest Energy, L.L.C.	O-409	WD	89	24	4,263	Plaquemines LA	16/22/23	Morgan City	28.920129	-89.621606
155	L.P.	O-616	SS	238	42.5	3,971	Cameron LA	-/3/11	Morgan City	28.421583	-90.866167
156	Petsec Energy Inc.	O-265	MP	19	7.5	3,908	Plaquemines LA	9/21/29	New Orleans	29.558909	-88.881908
157	LLC	O-353	SS	64	3	3,865	Vermilion LA	3/13/15	Morgan City	29.298889	-91.084444
158	LLC	O-353	SS	139	17	3,865	Cameron LA	-/7/16	Morgan City	28.784444	-90.767778
159	Century Exploration New Orleans, LLC	O-554	SS	154	36	3,810	Cameron LA	-/7/16	Morgan City	28.707972	-91.235778

160	Ltd.	O-658	VR	282	79	3,701	Cameron LA	-/4/13	Port Arthur	28.410816	-92.615607
161	L.L.C.	O-456	VR	369	100	3,637	Cameron LA	-/4/13	Port Arthur	28.085556	-92.538889
162	L.L.C.	O-456	VR	369	100	3,637	Cameron LA	-/4/13	Port Arthur	28.085556	-92.538889
163	Razor Exploration, LLC	O-703	GA	215	8	3,600	Matagorda TX	10/26/28	Houston-Galveston	0.000000	0.000000
164	Marlin Coastal, L.L.C.	O-588	EI	123	22	3,380	Vermilion LA	3/13/15	Morgan City	28.933407	-91.360059
165	Transmission	O-628	NA	NA	0	3,185	Cameron LA	27/41/43	Port Arthur	29.736111	-88.175000
166	Transmission	O-628	WC	69	10	3,185	Cameron LA	27/41/44	Port Arthur	0.000000	0.000000
167	Renaissance Offshore, LLC	O-689	WD	152	47	3,125	Plaquemines LA	16/22/23	Morgan City	28.587222	-89.699722
168	W & T Offshore, Inc.	O-367	CA	28	5.4	3,015	Plaquemines LA	11/35/31	New Orleans	29.697062	-88.826989
169	LLC	O-679	HI	160	25.15	2,991	Galveston TX	17/34/35	Corpus Christi	29.241944	-94.129167
170	Bois d'Arc Exploration LLC	O-686	SS	170B	29	2,917	Terrebonne LA	1/6/7	Morgan City	28.636974	-91.067326
171	LLC	O-451	BS	25	3.5	2,860	Plaquemines LA	11/25/31	New Orleans	29.541111	-88.989722
172	Whistler Energy II, LLC	O-707	GC	18	79	2,815	Cameron LA	-/1/7	Morgan City	27.943722	-91.029083
173	Apache Deepwater	O-685	EB	597	109	2,800	Matagorda TX	-/1/7	Corpus Christi	27.398611	-94.702500
174	PETROLEUM FUELS OFFSHORE, LLC	O-682	WC	426	72	2,695	Cameron LA	1/13/18	Port Arthur	28.711111	-93.322222
175	Apache Corporation	O-021	WC	33	3.6	2,560	Cameron LA	27/41/43	Port Arthur	28.680278	-93.024167
176	Fieldwood Energy LLC	O-709	WC	33	3.6	2,560	Cameron LA	27/41/43	Port Arthur	29.668333	-93.050000
177	Panther Interstate Pipeline Energy, LLC	O-570	NA	NA	0	2,475	Matagorda TX	10/26/28	Houston-Galveston	29.703056	-93.969722
178	Black Elk Energy Offshore Operations, LLC	O-650	SP	13	19	2,394	Cameron LA	27/41/43	New Orleans	29.477731	-93.638658
179	PetroQuest Energy, L.L.C.	O-409	EC	65	24	2,250	Cameron, LA	27/41/43	Port Arthur	29.336502	-92.988301
180	Ankor Energy LLC	O-654	PL	13	8	2,200	Terrebonne LA	13/18/20	Morgan City	28.935750	-90.642000
181	Williams Gas Pipeline	O-670	SS	332	50	2,170	Cameron LA	-/3/11	Morgan City	28.161389	-90.716667
182	McMoRan Exploration Co.	O-215	HI	353	113	2,140	Matagorda TX	-/7/15	Houston-Galveston	28.014167	-93.607500
183	Partners, LP	O-664	EI	19	0	2,078	Terrebonne LA	8/12/13	Morgan City	29.338333	-91.546667
184	Partners, LP	O-664	EI	32	10	2,078	Terrebonne LA	8/12/13	Morgan City	29.313569	-91.538433
185	W & T Offshore, Inc.	O-367	HI	379	110	2,053	Matagorda TX	-/7/15	Houston-Galveston	27.929722	-93.801389
186	W & T Offshore, Inc.	O-367	MP	69	3.5	2,012	Plaquemines LA	9/21/29	New Orleans	29.283056	-89.023611
187	Medco Energi US LLC	O-532	MP	64	8	2,009	Plaquemines LA	11/25/31	New Orleans	29.301950	-89.060217
188	Virgin Offshore U.S.A., Inc.	O-447	SS	153	36	2,000	Cameron LA	-/7/16	Morgan City	28.705946	-91.237726
189	Linder Oil Company, A Partnership	O-204	WC	168	25	1,686	Cameron LA	27/41/43	Port Arthur	29.407111	-93.404972
190	ExxonMobil Production Company	O-129	BA	341	8.5	1,670	Matagorda TX	41/54/55	Houston-Galveston	28.934089	-95.313400
191	Anglo-Suisse Offshore, Inc.	O-551	WD	41	14	1,506	Plaquemines LA	16/22/23	gan City/New Orle	29.093333	-89.751389
192	L.L.C.	O-340	SS	44	0.4	1,500	Terrebonne LA	8/12/13	Morgan City	29.390000	-90.806944
193	HOUSTON PIPELINE COMPANY LP	O-430	PS	1064	0	1,500	Cameron TX	10/20/22	Corpus Christi	26.488056	-97.081667
194	Monforte Exploration L.L.C.	O-586	SS	277	60	1,460	Cameron LA	-/3/11	Morgan City	28.299444	-91.087500

195	Hilcorp Energy Company	O-568	WD	27	1.98	1,402	Plaquemines LA	16/22/23	New Orleans	29.158333	-89.472500
196	Offshore, LLC	O-665	WD	79	6.25	1,350	Plaquemines LA	16/22/23	New Orleans	28.971667	-89.513889
197	Inc.	O-579	MP	60	12.5	1,313	Plaquemines LA	9/21/29	New Orleans	29.352944	-88.885417
198	Conn Energy, Inc.	O-088	WC	171	25.3	1,275	Cameron LA	27/41/43	Port Arthur	29.391059	-93.258581
199	Emerald Gathering & Transmission, LLC	O-671	GA	215	8	1,219	Matagorda TX	10/26/28	Houston-Galveston	29.126222	-94.821639
200	Corporation	O-370	ST	35	8	1,200	Terrebonne LA	13/18/20	Morgan City	30.115556	-90.433889
201	Tammany Oil & Gas LLC	O-622	HI	24	8	1,041	Galveston TX	17/34/35	Houston-Galveston	29.525761	-94.111295
202	Peregrine Oil & Gas II, LLC	O-637	PN	948	23	1,025	Kenedy TX	15/32/33	Corpus Christi	28.929694	-97.028083
203	Flextrend Development Company, L.L.C.	O-507	HI	A573	112	1,000	Matagorda TX	-/7/15	Houston-Galveston	28.469167	-93.739444
204	Company	O-411	NA	NA	0	966	Brazoria TX	11/17/17	Houston-Galveston	28.968611	-95.263847
205	Company	O-411	GA	288	14.4	966	Brazoria TX	11/17/17	Houston-Galveston	28.883333	-94.700000
206	McMoRan Exploration Co.	O-215	WD	24	3	949	Plaquemines LA	16/22/23	Morgan City	29.186389	-89.527222
207	Enbridge Offshore (Gas Gathering) L.L.C.	O-572	WC	21	3	937	Cameron LA	27/41/43	Port Arthur	29.709444	-93.568333
208	LLC	O-701	WC	2	0.4	871	Cameron LA	27/41/43	Port Arthur	29.765894	-93.193483
209	Cochon Properties, LLC	O-694	WD	45	12	838	Plaquemines LA	16/22/23	New Orleans	29.119444	-89.640556
210	Crimson Gulf, LLC	O-693	MP	69	1	750	Cameron LA	-/7/16	New Orleans	29.200000	-89.045528
211	Crimson Gulf, LLC	O-693	EI	188	37.53	750	Cameron LA	-/7/16	Morgan City	28.778861	-91.386306
212	Atinum Energy, Inc.	O-677	MU	746	9.2	646	Kleberg TX	13/21/22	Corpus Christi	27.756567	-96.982000
213	EC Offshore Properties, Inc.	O-702	EC	71	19	600	Cameron LA	27/41/43	Port Arthur	29.339694	-92.690194
214	Dominion Producon Company, LLC	O-681	MU	818	3	535	Kleberg TX	13/21/22	Corpus Christi	27.510019	-97.166276
215	Company	O-240	MI	658	10	517	Calhoun TX	26/30/30	Corpus Christi	28.027964	-96.641603
216	LLC	O-701	EI	184	62	505	Cameron LA	-/7/16	Morgan City	28.732417	-91.607950
217	L.P.	O-593	SM	210	7.56	500	Cameron LA	8/24/27	Morgan City	29.466111	-92.151944
218	Matagorda Island Gas Operations, LLC	O-561	MI	632	11	500	Calhoun TX	26/30/30	Corpus Christi	28.066111	-96.571667
219	Knight Resources, LLC	O-712	GA	350	28	470	Matagorda TX	10/26/28	Houston-Galveston	28.721667	-94.904722
220	Rooster Petroleum, LLC	O-604	EC	37	6	420	Cameron LA	27/41/43	Port Arthur	29.493299	-92.639667
221	Virgin Offshore U.S.A., Inc.	O-447	EC	122	35	400	Cameron LA	1/13/18	Port Arthur	29.081111	-92.861944
222	Petro Ventures, Inc.	O-434	MP	133	25.9	377	Plaquemines LA	11/25/31	New Orleans	29.398213	-88.628003
223	Legacy Resources Co., L.P.	O-199	MO	78	3	375	St. Bernard LA	7/16/18	Mobile	30.280058	-87.968083
224	Apex Oil & Gas, Inc.	O-022	EC	24	6	345	Cameron LA	25/41/47	Port Arthur	29.529703	-92.801943
225	Company	O-240	NA	NA	0	301	Calhoun TX	26/30/30	Corpus Christi	28.185603	-96.689447
226	L.L.C.	O-456	EC	23	5.57	295	Cameron LA	1/13/21	Port Arthur/Morgan C	29.534167	-92.748611
227	Magellan E&P Holdings, Inc.	O-589	MU	926	2.1	272	Kleberg TX	13/21/22	Corpus Christi	27.564567	-97.195203
228	Callon Petroleum Operating Company	O-060	MO	908	8	259	St. Bernard LA	7/16/18	Mobile	30.108200	-88.325700
229	XTO Offshore Inc.	O-031	SM	196	115	250	Cameron LA	-/4/13	Morgan City	27.970556	-92.066111

230	Corporation	O-458	LL	400	128	231	Plaquemines LA	-/2/6	Mobile	27.561944	-87.740278
231	Panther Interstate Pipeline Energy, LLC	O-570	HI	377	112.7	224	Matagorda TX	-/7/15	Houston-Galveston	27.965000	-93.693333
232	Wild Well Control, Inc.	O-642	GI	47	13.3	200	Terrebonne LA	13/18/20	Morgan City	28.960333	-90.023333
233	Linder Oil Company, A Partnership	O-204	GI	18	8	194	Terrebonne LA	13/18/20	Morgan City	29.167222	-89.900556
234	Arena Offshore, LP	O-512	EI	58	6	175	Terrebonne LA	8/12/13	Morgan City	29.240833	-91.377778
235	Fairways Offshore Exploration, Inc.	O-132	SS	283	46	145	Cameron LA	-/3/11	Morgan City	28.278081	-90.791528
236	ATP Oil & Gas Corporation	O-592	DC	133	72	125	Plaquemines LA	-/2/9	Mobile	28.820833	-87.885278
237	High Point Gas Transmission LLC	O-699	MP	55	1	106	Plaquemines LA	11/25/31	New Orleans	29.271667	-88.723333
238	High Point Gas Transmission LLC	O-699	MP	298	23	106	Plaquemines LA	11/25/31	New Orleans	29.355000	-89.118333
239	Maritech Resources, Inc.	O-212	EC	328	95.6	100	Galveston TX	-/4/12	Port Arthur	28.179083	-92.696000
240	Inc.	O-579	MU	898	4	100	Kleberg TX	13/21/22	Corpus Christi	27.680206	-97.087947
241	Medco Energi US LLC	O-532	EC	317	96	85	Galveston TX	-/4/12	Port Arthur	28.208383	-92.951867
242	Saratoga Resources, Inc.	O-692	MP	25	8	77	Plaquemines LA	11/25/31	New Orleans	29.528056	-89.406389
243	LLC	O-678	PL	13	10	70	Terrebonne LA	13/18/20	New Orleans	28.927500	-90.651111
244	Statoil USA E&P Inc.	O-643	MC	961	92	60	Plaquemines LA	-/5/11	Morgan City	28.022778	-88.139444
245	AnaTexas Offshore, Inc.	O-638	BA	446	6.8	50	Matagorda TX	29/40/42	Corpus Christi	28.486959	-95.948712
246	Sojitz Energy Venture, Inc.	O-584	VR	86	20	43	Vermilion LA	16/22/23	Port Arthur	29.240569	-92.409339
247	BLACK POOL ENERGY LP	O-585	GA	307	5	41	Matagorda TX	10/26/28	Houston-Galveston	25.872389	-95.267722
248	Petsec Energy Inc.	O-265	CA	32	11	31	Plaquemines LA	9/21/29	New Orleans	29.713056	-88.663222
249	Virgin Offshore U.S.A., Inc.	O-447	WC	41	5.45	23	Cameron LA	27/41/43	Port Arthur	29.673611	-93.400000
250	Fairways Offshore Exploration, Inc.	O-132	CA	29	5	20	Plaquemines LA	11/25/31	New Orleans	29.717444	-88.797167
251	Hoactzin Partners, L.P.	O-705	CA	30	9	20	Plaquemines LA	11/25/31	New Orleans	29.701417	-88.762632
252	Tengasco, Inc.	O-644	CA	30	9	20	Plaquemines LA	11/25/31	New Orleans	29.701417	-88.762632
253	Hoactzin Partners, L.P.	O-705	HI	176	24.2	20	Galveston TX	17/34/35	Houston-Galveston	29.175222	-94.371000
254	Tengasco, Inc.	O-644	HI	176	24.2	20	Galveston TX	17/34/35	Houston-Galveston	29.175222	-94.371000
255	Energy XXI GOM, LLC	O-555	HI	A351	125	15	Matagorda TX	-/7/15	Houston-Galveston	28.043333	-93.495278
256	Breton Energy, LLC	O-635	WC	225	39	12	Cameron LA	1/13/18	Port Arthur	29.191727	-93.312911
257	Gateway Offshore Pipeline Company	O-633	EC	121	37	11	Cameron LA	1/13/18	Port Arthur	29.059131	-93.037414
258	Tammany Oil & Gas LLC	O-622	HI	45	18	9	Galveston TX	17/34/35	Houston-Galveston	29.438233	-93.788266
259	AnaTexas Offshore, Inc.	O-638	BA	446	6.8	5	Matagorda TX	29/40/42	Corpus Christi	28.486959	-95.948712
260	LLC	O-611	MC	20	10.6	4	Plaquemines LA	6/13/16	New Orleans	28.938167	-88.970833
261	Matagorda Island Gas Operations, LLC	O-561	MI	631	9.5	1	Calhoun TX	26/30/30	Corpus Christi	0.000000	0.000000

Segment 13782
SL 21137 can't verify
Segment 4879
Segment 4073
can't verify
State ROW 932-1946
Segment 9954

WC 552 to WC 551 using WC 552 location

9700 Fast Water Containment

In the U.S, seventy percent of oil cargo is transported through waters where the current exceeds one knot under these conditions it is essential to improve the ability and efficiency of spill recovery operations.

Over the past few years the U.S. Coast Guard Research and development Center has conducted a great deal of work to improve fast water containment and recovery capabilities in all USCG area of operations.

The *Oil Spill Response in Fast Current—Field Guide and Decision Tool*, provides information to field oil spill response units on deployment strategies and techniques that will maximize the effectiveness of conventional oil spill recovery systems. Identifies new-generation booms and skimmers with higher efficiencies in fast currents to increase recovery capability in areas where conventional systems do not work well. Details are given for the decisions that need to be made and the types of equipment needed to safely deploy these systems. See the link or touch the titles below:

<http://www.rdc.uscg.gov/>

[*EVALUATION OF NEW APPROACHES TO THE CONTAINMENT AND RECOVERY OF OIL IN FAST WATER OIL RESPONSE IN FAST WATER CURRENTS - A DECISION TOOL*](#)

9500 List of Agreements**9600 Conversions**

9700 List of Response References

9710 Strategies and Sensitive Areas

Environmental Sensitivity Index (ESI) maps have been developed for the shoreline and coastal areas of SE Florida. The ESI maps include information for three main

components: shoreline habitats; sensitive biological resources; and human-use resources. Background information, as well as the methods of data collection and presentation are summarized within the map narratives.

Shoreline Habitat Mapping

The intertidal habitats of SE Florida were mapped during overflights conducted in May, 1993. The aerial surveys were conducted using fixed-wing aircraft, flying at elevations of 300-500 feet and slow air speed. An experienced coastal geologist updated the intertidal habitats directly onto the same 1:24,000 scale U.S. Geological Survey topographic maps that were used during the original shoreline mapping project in July 1981. Where appropriate, multiple habitats were delineated for each shoreline segment. Relatively simple changes to the shoreline position and shape were made during the overflights. Where there were complex changes in the shoreline, the most current aerial photographs

were used to update the shoreline and habitats on the topographic maps, particularly where new canals and marinas were built. Prediction of the behavior and persistence of oil on intertidal habitats is based on an understanding of the dynamics of the coastal environments, not just the substrate type and grain size. The sensitivity of a particular intertidal habitat is an integration of the following factors:

Shoreline type (substrate, grain size, tidal elevation, origin)

Exposure to wave and tidal energy

Biological productivity and sensitivity

Ease of cleanup

All of these factors are used to determine the relative sensitivity of intertidal habitats. Key to the sensitivity ranking is an understanding of the relationships between: physical processes, substrate, shoreline type, product type, fate and effect, and sediment transport patterns. The intensity of energy expended upon a shoreline by wave action, tidal currents, and river currents directly affects the persistence of stranded oil. The need for

shoreline cleanup activities is determined, in part, by the slowness of natural processes in removal of oil stranded on the shoreline. These concepts have been used in the development of the ESI, which ranks shoreline environments as to their relative sensitivity to oil spills, potential biological injury, and ease of cleanup. Generally speaking, areas exposed to high levels of physical energy, such as wave action and tidal currents, and low biological activity rank low on the scale, whereas sheltered areas with

associated high biological activity have the highest ranking. The list below includes the shoreline habitats delineated for the entire coastline of Florida, presented in order of increasing sensitivity to spilled oil:

- 1) Exposed Vertical Rocky Shores/Seawalls
- 2) Exposed Rocky Platforms
- 3) Fine-grained Sand Beaches
- 4) Coarse-grained Sand Beaches
- 5) Mixed Sand and Gravel Beaches/Fill
- 6) Gravel Beaches/Riprap
- 7) Exposed Tidal Flats
- 8) Sheltered Rocky Shores/Seawalls/Vegetated Banks
- 9) Sheltered Tidal Flats
- 10A) Exposed Marshes and/or Mangroves
- 10E) Sheltered Marshes and/or Mangroves

In 2011, county-specific focused workshops were convened with federal, state and municipal agencies, county emergency and environmental managers, and Oil Spill Response Organizations (OSROs) to review, edit and update the ESIs for currency.

The Environmental Unit will reference the developed ESI maps (East Florida Atlas and South Florida Atlas) and when developing at-time applicable protective strategies:

<http://ocean.floridamarine.org/acp/miaacp/Maps.html>

9711 Fast Water Containment

In the U.S, seventy percent of oil cargo is transported through waters where the current exceeds one knot under these conditions it is essential to improve the ability and efficiency of spill recovery operations.

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<http://www.rdc.uscg.gov/>

[*EVALUATION OF NEW APPROACHES TO THE CONTAINMENT AND RECOVERY OF OIL IN FAST WATER OIL RESPONSE IN FAST WATER CURRENTS - A DECISION TOOL*](#)

9720 Technical References

9720.1 Incident Management Handbook (IMH).

The most recent copy can be found in the “Library” Section on <http://homeport.uscg.mil/ics>

Go to “Incident Command System” sub-section then look under “Job Aides”.

9720.2 ICS Forms and Job Aids

<http://homeport.uscg.mil/ics>.

Go to “Incident Command System” sub-section then look under “Job Aides” and “Forms”.

9720.3 CHRIS Manual

Chemical Hazards Response Information System

(CHRIS) is designed to provide information needed for decision-making by responsible Coast Guard personnel during emergencies that occur during the water transport of hazardous chemicals. CHRIS also provides much information that can be used by the Coast Guard in its efforts to achieve better safety procedures and so prevent accidents.

9720.4 National Contingency Plan (NCP) Product Schedule

<http://www.epa.gov/emergencies/content/ncp/>

9720.5 Oil Spill Prevention, Planning and Response Measures

9720.6 Mechanical Containment and Recovery of Spilled Oil

9720.7 Dispersants in Oil Spill Response

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

9720.8 Bio-remediation in Oil Spill Response

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

9720.9 In-Situ Burning In Oil Spill Response

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/newrrt_iv-opsmanual.htm

9720.10 Oil Spill Shoreline Assessment and Shoreline Cleanup

9720.11 Oil Spill Response Planning and Spill Response Roles

9720.12 DOT Emergency Response Guidebook

9720.13 Obtaining Chemical Information

Telephone Information and Technical Support References

Resource	Contact	Services Provided
Chemical Transportation Emergency Center (CHEMTREC)	800-4242-9300	24-hour emergency number connecting with manufacturers and/or shippers. Advice provided on handling, rescue gear, decontamination considerations, etc. Also provides access to the Chlorine Emergency Response Plan (CHLOREP).
CHEM-TEL	800-255-3924	Provides immediate information for personnel on scene of a chemical spill.
Agency for Toxic Substances and Disease Registry (ATSDR)	404-639-6360	24-hour emergency number for health-related support in hazardous materials emergencies, including onsite assistance.
Bureau of Explosives	800-424-9346	Available 9am to 6pm (EST). Provides information on SARA Title III, list of extremely hazardous substances, and planning guidelines.
Environmental Protection Agency (EPA) Regional IV Office	404-562-8700	24-hour emergency number. Environmental Response Teams are available for technical assistance
Resource	Contact	Services Provided
National Pesticides Information Retrieval System	765-494-6616	Contact information for help in searching NPIRS database to get fact sheets on pesticides, insecticides, fungicides, and state and federally registered chemicals.

National Pesticide Telecommunications Network	800-858-7378	Provides information about pesticide-related topics; including pesticide products, recognition and management of pesticide poisoning, toxicology, environmental chemistry, referrals for laboratory analyses, investigation of pesticide incidents, emergency treatment, safety, health and environmental effects, cleanup, and disposal procedures.
National Response Center	800-424-8802	A federal hotline for reporting oil and hazardous substances spills / releases.
U.S. Army Soldiers and Biological Chemical Command (SBCCOM)	800-368-6498	24-hour consultation service for threats and releases pertaining to chemical and biological agents.
State Emergency Response Commission Florida	800-635-7179 850-413-9970	
State Health Department Florida	850-245-4040	Florida Dept. of Health, Emergency Operations
State Emergency Management Office Florida	850-413-9900	Florida Div. of Emergency Mgmt.
FEMA Regional Office	877-336-2627	
State Agriculture Office	404-331-4524 or 404-909-0537	24 hour
State Lab Office	904-296-3007	Environmental Conservation Lab
State EMS Office	904-633-2211	Local office

Computerized Data Sources for Information and Technical Support

Data System	Contact	Description
CAMEO	CAMEO Database Manager National Oceanic and Atmospheric Administration (NOAA) Hazardous Materials Response Division 7600 Sand Point Way, N.E. Seattle, Washington 98115 (206) 526-6317 website: www.epa.gov/ceppo/cameo	Computer-aided management of emergency operations available to on-scene responder(s). Chemical identification database assists in determining substance(s) involved, predicting downwind concentrations, providing response recommendations, and identifying potential hazards.
CHRIS	CIS, Inc. c/o Oxford Molecular Group 11350 McCormick Road Executive Plaza, Suite 1100 Hunt Valley, Maryland 21031 (800) 247-8737 website: www.oxmol.com/software/cis/details/CHRIS.shtml	Chemical Hazard Response Information System, developed by the Coast Guard and comprised of reviews on fire hazards, fire-fighting recommendations, reactivities, physicochemical properties, health hazards, use of protective clothing, and shipping information for over 1,000 chemicals.
HAZARDTEXT	Micromedex, Inc Suite 300 6200 S. Syracuse Way Englewood, Colorado 80111-4740 (800) 525-9083 website: www.micromedex.com/products/pd-main.htm	Assists responders dealing with incidents involving hazardous material, such as spills, leaks, and fires. Provides information on emergency medical treatment and recommendations for initial hazardous response.
HMIS	Kevin Coburn Information Systems Manager U.S. Department of Transportation D.H.M. 63 - Room 8104 400 7th Street SW Washington, D.C. 20590-0001 website: www.dlis.dla.mil/hmis.htm	Hazardous Material Information Systems contains information on hazardous materials. Transportation-related incidents may be reported on DOT form 5800.1 (Hazardous Materials Incident Report Form).

HSDB	HSDB Representative National Library of Medicine Specialized Information Systems 8600 Rockville Pike Bethesda, Maryland 20894 (301) 496-6531 website: sis.nlm.nih.gov/sis1	Hazardous Substances Data Bank, compiled by the National Library of Medicine, provides reviews on the toxicity, hazards, and regulatory status of over 4,000 frequently used chemicals.
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Data System	Contact	Description
First Medical Response Protocols	Micromedex, Inc. Suite 300 6200 S. Syracuse Way Englewood, Colorado 80111 (800) 525-9083 website: www.micromedex.com/products/pd-main.htm	Helps develop training programs and establish protocols for first aid or initial workplace response to a medical emergency.
MEDITEXT	Micromedex, Inc. Suite 300 6200 S. Syracuse Way Englewood, Colorado 80111 (800) 525-9083 website: www.micromedex.com/products/pd-main.htm	Provides recommendations regarding the evaluation and treatment of exposure to industrial chemicals.
OHMTADS	Oxford Molecular Group, Inc. 11350 McCormick Rd. Executive Plaza 3, Suite 1100 Hunt Valley, Maryland 21031 (800) 247-8737 website: www.oxmol.com/software/cis/details/OHMTADS.shtml .	Oil and Hazardous Materials/Technical Assistance Data Systems provides information on the effects of spilled chemical compounds and their hazardous characteristics and properties, assists in identifying unknown substances, and recommends procedures for handling cleanups
TOMES	Micromedex, Inc. Suite 300 6200 S. Syracuse Way Englewood, Colorado 80111 (800) 525-9083 website: www.micromedex.com/products/Plus/pd-main.htm	The Tomes Plus Information Systems is a series of comprehensive databases on a single CD-ROM disc. It provides information regarding hazardous properties of chemicals and medical effects from exposure. The Tomes database contains Meditext, Hazardtext, HSBD, CHRIS, OHMTADS, and 1st Medical Response Protocols.

TOXNET	Toxicology Data Network (TOXNET) National Library of Medicine Specialized Information Services 8600 Rockville Pike Bethesda, Maryland 20894 (301) 496-6531 website: sis.nlm.nih.gov/sis1	A computerized system of three toxicologically oriented data banks operated by the National Library of Medicine, the Hazardous Substances Data Bank, the Registry of Toxic Effects of Chemical Substances, and the Chemical Carcino-genesis Research Information System. TOXNET provides information on the health effects of exposure to industrial and environmental substances.
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9730 Geographic Response Plans (GRP)

Geographic Response Plans (GRPs) are site-specific response plans for protecting identified sensitive coastal and inner waterways from oil spills. They include response strategies tailored to a specific beach, shore, or waterway and meant to minimize impact on sensitive areas threatened by the spill. Please refer to the following website for the SECMOB GRP's.

<http://ocean.floridamarine.org/acp/MOBACP/StartHere.html>

9731 Tidal Inlet Protection Strategies (TIPS)

The coastal inlets of SE Florida are the focal points for designing strategies to protect the vital resources of the state's estuaries and inland waters, because through these conduits that oil spilled on open ocean waters could reach the resources. A project was commissioned to provide a synopsis of the relevant characteristics of the tidal inlets on the east coast of the stat, as well as a discussion of potential protection strategies for each inlet. The discussion of each inlet alludes to the range of conditions that might occur at the inlet; however protection strategies were based on best professional judgment of what would work under average wave and tidal conditions.

The Environmental Unit will reference the proposed tidal inlet protection strategies when developing at-time applicable protective strategies:

<http://ocean.floridamarine.org/acp/miaacp/Documents.html>

The diagrams that accompany the proposed protection strategies are schematic representations of boom placement, collection points, anchor points, and skimmer

locations. The proposed strategies are baseline arguments and should not be interpreted as the only workable protection scheme. Each spill will be time, place, and circumstance specific.

In 2011, county-specific focused workshops were convened with federal, state and municipal agencies, county emergency and environmental managers, and Oil Spill Response Organizations (OSROs) to review, edit and update the TIPs for currency.

9732 Regional Response Team IV Plan

There are thirteen Regional Response Teams (RRTs) in the U.S., each representing a particular geographic region (including the Caribbean and the Pacific Basin). RRTs are composed of representatives from field offices of the federal agencies that make up the National Response Team (<http://www.nrt.org/>), as well as state representatives.

RRT 4 Regional Response Plan is available online at: http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm.

9733 RRT IV Ops Manual

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm.

9734 Regional Contingency Plan Dispersants Plan

http://www.nrt.org/production/NRT/RRTHome.nsf/Allpages/rrt_RRTIV_home.htm.

9740 Relevant Statute / Regulations Authorities List

Refer to following website for Site Safety Plan Template:

http://www.uscg.mil/forms/ics/ICS_208_CG.pdf

9740.1 Federal Water Pollution Control Act (FWPCA)

33 USC 1321

Passed in 1972 and designed to eliminate all water pollution by 1985.

Established the National Contingency Plan (NCP), 40 CFR 300-provided a national action plan for pollution containment, dispersal, and removal.

Created the National Strike Force.

Provisions which made spiller obligated to respond to a spill.

Established Civil and Criminal Penalties.

9740.2 Clean Water Act (CWA)

46 CFR 31, 35, 112

Amended FWPCA.

Allowed USCG to clean up a spill and recover costs incurred by spiller.

311-K revolving pollution fund with \$35 million ceiling (33 USC 1321, sec.311, paragraph. K).

Pollution Prevention Requirements (PPR) (33 CFR 151. 154-156).

Created National Response Center.

Defined “harmful quantity” and “reportable quantity” (RQ).

9740.3 Oil Pollution Act of 1990 (OPA 90)

Amended FWPCA/CWA.

\$1 Billion Oil Spill Liability Trust Fund (OSLTF) which combined 311-K and additional Congressional appropriations- controlled by National Pollution Fund Center (NPFC).

Taxes on crude oil, which along with recovered penalties, maintains the OSLTF (6 cents a barrel).

Established authority for Federal On Scene Coordinator (FOSC) to designate Responsible Parties (RP).

Established National Strike Force Coordinator Center and reestablished the Atlantic Strike Team.

Increased RP liabilities and responsibilities.

Increased penalties for a violation of the FWPCA (“The Act”).

Allows states access to the Oil Spill Liability Trust Fund.

Allows for third party claims for personal property and environmental damaged caused by an accident.

9740.4 Refuse Act of 1899

Applies to trash: tires, refrigerators, trees, cars, etc.

Anything that creates a “Hazard to Navigation.”

Fines of \$500-\$2,500 and imprisonment for 30 days to a year.

Army Corps of Engineers (ACOE) enforcement.

The main purpose of the law is to maintain clear navigation channels.

9740.5 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

40 CFR 302

Requires RP to report any release of HAZ substances if meets or exceeds the RQ.

Created \$1.6 Billion Superfund.

Violations: Civil-\$32,500 per violation; \$32,500 per day if continuous... depending on the situation (reference: Civil Penalty Guide).

Criminal: up to 3 years imprisonment and maximum fine of \$50,000.

Before On Scene Coordinator (OSC) can initiate a response, 3 jurisdiction elements must be present:

- (a) Material must be a hazardous substance or it is a pollutant or contaminant that may present an imminent and substantial danger to the public health or welfare.
- (b) There has been a release, or there is a substantial threat of a release, into the environment. Release at RQ must be within 24hr period.
- (c) The RP is not taking proper removal actions.

9740.6 Superfund Amendment and Reauthorization Act (SARA)

Amended CERCLA.

Created \$8.5 Billion Superfund.

Redefined release to include abandonment or discarding barrels, drums, enclosed container, etc.

Reimbursement of expenses incurred by local govt. by carrying out responses (up to \$32,500 a day).

Redefined response to include enforcement activities.

Extended liability to foreign ships in areas under U.S. control, whether or not such vessels were otherwise subject to U.S. jurisdiction.

9740.7 Resource Conservation and Recovery Act (RCRA)

Protects human health and environment by reducing waste and conserving energy and natural resources.

Reduces or eliminates the generation of Hazardous Waste as expeditiously as possible.

Covers waste from generation to disposal, “CRADLE TO GRAVE”.

9750 Communications Plan

Refer to following website for Communication Plan Template:

http://www.uscg.mil/forms/ics/ICS_205_CG.pdf

9750.1 ICS 208 - Site Safety Plan (SSP) Template

Refer to: http://www.uscg.mil/forms/ics/ICS_208_CG.pdf

9760 Waste Management Plan

Plan under review for updates by Area Committee for 2014

9770 Shoreline Countermeasures Plan

Until the SECMOB Shoreline Countermeasures Plan is complete please refer to the following website for shoreline protection plans and strategies and also the RRTIV Website.

<http://www.rrt4.nrt.org/>

<http://ocean.floridamarine.org/acp/MOBACP/StartHere.html>

9780 Fish and Wildlife Response Plan

SECMOB currently uses the template from Florida Fish and Wildlife Conservation Commission. See Wildlife Contingency Plan for Oil Spill Response at the following website.

Refer to: <http://ocean.floridamarine.org/ACP/wcp>

Also: <http://www.rrt4.nrt.org/>

Glossary

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User's Survey
