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This is the Alabama, Mississippi, Northwest Florida Coastal Area Contingency Plan. 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 Area Committee should use this plan for responses to oil and hazardous substances 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 ALMSNWFL COASTAL ACP.

The Sector Mobile AC encourages active participation by all interested parties in the continuing Area Contingency Planning Process. Comments, suggestions, and corrections should be directed to the Sector Mobile AC.

The effective date of this plan is 15AUG2017.
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 – 24hr Line)
1-202-267-2675 (Toll Call – 24hr Line)

In addition to contacting the NRC, spillers may contact the nearest United States Coast Guard or Environmental Protection Agency Office. For spills in the Sector Mobile COTP Area of Responsibility contact:

U.S. Coast Guard Sector Mobile
251-441-5976

U.S. Environmental Protection Agency
404-562-8700

First Responder Guidelines

Ensure to utilize the Emergency Response Guidebook (ERG) to take proper cautions while responding to each incident. Approach cautiously from upwind, uphill, or upstream of the incident and assess the situation from a safe distance. Use binoculars, if available, to view the scene. Attempt to determine if radiological materials or hazardous substances are present.

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

Observe and Note the Following:

- Impact on people, animals, and the environment.
- Container types, markings, placards, and labels. If available, use the Department of Transportation Emergency Response Guidebook (ERG) for reference.
- Signs of any release or discharge substances and any unusual or pungent odors (move farther away or upwind if you detect an odor and cannot determine whether or not it is safe).
- Wind direction and prevailing weather.
- Distance and direction of nearby dwellings.
- Distance and direction of any nearby surface water.
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 personnel 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.

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

- Date and Time of Call
- Caller Name, Address, and Phone Number
- Name of Person Taking the Report.
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<td>Name of Responsible Party (Potentially)</td>
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<tr>
<td>2.</td>
<td>Name of vessel/facility.</td>
</tr>
<tr>
<td>3.</td>
<td>Railcar/truck number or other identifying information.</td>
</tr>
<tr>
<td>4.</td>
<td>Type and size of vessel/facility.</td>
</tr>
<tr>
<td>5.</td>
<td>Total quantity of fuel on board, or in tank.</td>
</tr>
<tr>
<td>6.</td>
<td>Nationality (vessel only)</td>
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<tr>
<td>7.</td>
<td>Location of incident (i.e. Street address, lat/long, mile marker)</td>
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<tr>
<td>8.</td>
<td>Date and time of incident (or when discovered)</td>
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<tr>
<td>9.</td>
<td>Description of spill (i.e. Size, color, smell, etc.)</td>
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<td>10.</td>
<td>Type of incident (e.g. Explosion, collision, tank failure, grounding, etc.)</td>
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<td>13.</td>
<td>Estimated amount released/discharged.</td>
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<td>14.</td>
<td>Total potential quantity that could be released/discharged (i.e. Total quantity in tank or on board)</td>
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<td>15.</td>
<td>Environmental media impacted or potentially impacted by spill (e.g. Air, water, ground, soil, etc.)</td>
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<td>17.</td>
<td>Point of contact (i.e. Responsible Party name &amp; phone address)</td>
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<td>18.</td>
<td>Vessel/Facility agent(s) (i.e. Name and phone number)</td>
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<td>Name and contact information of insurance carrier.</td>
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<td>Number and type of injuries or fatalities.</td>
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<td>Description of who is on-scene and what response activities are being done or have been completed.</td>
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<td>23.</td>
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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

Section 4202 of the Oil Pollution Act of 1990 (OPA ’90) amended Subsection (j) of Section 311 of the Federal Water Pollution Control Act (FWPCA) (33 U.S.C. 1321 (j)) to address the development of a national planning and response system. As part of this system, area committees were established for each area designated by the President.

The functions of designating areas, appointing area committee members, determining the information to be included in area contingency plans, and reviewing and approving area contingency plans have been delegated by Executive Order 12777 of 22 October 1991, to the Commandant of the U.S. Coast Guard (USCG) (through the Secretary of Transportation) for the coastal zone and to the Administrator of the Environmental Protection Agency for the inland zone.

The term “coastal zone” is defined in the current 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 USCG has designated those portions of the Captain of the Port (COTP) zones which are within the coastal zone as areas for which area committees will prepare ACPs. The COTP zones are described in the Code of Federal Regulations (CFRs), specifically in 33 CFR Part 3.
1100.2 U.S. Environmental Protection Agency

By statute, EPA is the pre-designated FOSC and Scientific Support Coordinator for inland spills of oil or discharges of hazardous substances. In most instances, EPA will not be the first responder on scene. EPA works in cooperation with other responders, but shall designate on scene coordinators for specific areas in the inland zone. 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 UC with State and local responders.

1100.3 Alabama Department of Environmental Management

Refer to: [http://www.adem.state.al.us/default.cnt](http://www.adem.state.al.us/default.cnt)

1100.4 Mississippi Department of Environmental Quality

Refer to: [http://www.deq.state.ms.us](http://www.deq.state.ms.us)

1100.5 Florida Department of Environmental Protection

Refer to: [http://www.dep.state.fl.us/](http://www.dep.state.fl.us/)
1200 Geographic Boundaries

MOBILE MARINE INSPECTION AND COTP ZONE
The following zone description can be found in the Title 33 CFR 3.40-10:

Sector Mobile’s office is located in Mobile, AL. Subject to the overriding provisions of § 3.40-5, the boundaries of Sector Mobile’s Marine Inspection Zone and COTP Zone start near the Florida coast at latitude 30°05′45″ N., 084°04′34″ W. proceeding northerly along the boundary between Wakulla and Jefferson counties to position 30°15′00″ N., 084°04′33″ W.; thence west to latitude 30°15′00″ N, longitude 84°45′00″ W; thence north to a point near the southern bank of the Seminole Lake at latitude 30°45′57″ N, longitude 84°45′00″ W; thence northeast along the eastern bank of the Seminole Lake and north along the eastern bank of the Flint River to latitude 32°20′00″ N, longitude 84°01′51″ W; thence northwest to the intersection of the Georgia-Alabama border at latitude 32°53′00″ N; thence north along the Georgia-Alabama border to the southern boundary of DeKalb County, AL, thence west along the northern boundaries of Cherokee, Etowah, Blount, Cullman, Winston, and Marion Counties, AL, to the Mississippi-Alabama border; thence north along the Mississippi-Alabama border to the southern boundary of Tishomingo County, MS, at the Mississippi-Tennessee border; thence west along the southern boundaries of Tishomingo and Prentiss Counties; thence north along the western boundaries of Prentiss and Alcorn Counties; thence west along the northern boundaries of Tippah, Benton, and Marshall Counties, MS; thence south and west along the eastern and southern boundaries of DeSoto, Tunica, Coahoma, Bolivar, and Washington Counties, MS; thence east along the northern boundary of Humphreys and Holmes Counties, MS; thence south along the eastern and southern boundaries of Holmes, Yazoo, Warren, Claiborne, Jefferson, Adams, and Wilkinson Counties, MS; thence east from the southernmost intersection of Wilkinson and Amite Counties, MS, to the west bank of the Pearl River; thence south along the west bank of the Pearl River to longitude 89°31′48″ W (at the mouth of the river); thence south along longitude 89°31′48″ W to latitude 30°10′00″ N; thence east along latitude 30°10′00″ N to longitude 89°10′00″ W; thence southeast to latitude 29°00′00″ N, longitude 88°00′00″ W; thence south along longitude 88°00′00″ W to the outermost extent of the EEZ; thence east along the outermost extent of the EEZ to the intersection with a line bearing 199°T from with a line bearing 199°T from 29°23′09″ N., 084°04′34″ W. to the EEZ (24°48′13″ N., 085°50′05″ W.); thence northeast to 29°23′09″ N., 084°04′34″ W.; thence due north to the Florida coast at longitude 084°04′34″ W. (30°05′45″ N., 084°04′34″ W.).

1210 Current Memorandum of Agreement Between USCG Eighth District and EPA Region 4

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

U.S. Coast Guard COTP Mobile, Alabama is the pre-designated FOSC in the following areas within EPA Region 4. 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 COTP St. Petersburg-COTP Mobile boundary along the Florida coast at latitude 30 degrees 05 minutes 45 seconds north, longitude 084 degrees 04 minutes 34 seconds west; proceeding northerly along the boundary between Wakulla and Jefferson counties to US 98/State Hwy 30 (latitude 30 degrees 08 minutes 34 seconds north, longitude 83 degrees 50 minutes west); then west on US 98 to US 98A/State Hwy 30 (nearest the coast in Panama City, FL); then northwest on US 98A/State Hwy 30 to US 98; then west on US 98 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 to US 90; then south and west on US 90 to the COTP Mobile-COTP New Orleans boundary coterminous with the Mississippi and Louisiana state boundary on the Pearl River; then south to the Gulf of Mexico.

Also included will be the Gulf Intracoastal Waterway (GICW); the Ochlocknee 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.

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**1300 Area Committee (AC)**

**Mission Statement**

Our mission is to ensure the highest state of readiness for 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 including 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 Mississippi, Alabama, and Northwest Florida coastal areas.

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**1310 AC Purpose**

The AC is the 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 AC is also responsible for working with State and local officials to preplan for joint response efforts, including appropriate procedures for mechanical recovery, dispersant use, shoreline clean-up, protection of sensitive environmental areas, and protection, rescue, and rehabilitation of fisheries and wildlife. The AC 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, and 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 AC was established to include Alabama, Mississippi, and Northwest Florida coastal waters.

1320 AC Organization

The Alabama, Mississippi, Northwest Florida AC is comprised of representatives from Federal, State, and local governments as members and representatives from the marine industry as advisors.

ESG and Chairmanship: The ESG is the ultimate decision making body of the AC and provides direction as appropriate. The ESG consists of the FOSC and the three State On-Scene Coordinators (SOSCs). The Sector Commander, Sector Mobile, as the pre-designated FOSC, shall be the Chairman of the ESG and Area Committee. The Deputy Commander, Sector Mobile shall each serve as Alternate Chairman. The appropriate SOSC shall serve as Vice Chairman representing the appropriate State. The Chairman shall conduct each AC meeting and provide an opportunity for regulatory member participation, 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.

AC Members: The AC members duties and responsibilities are to plan for Worst Case Discharge (WCD), develop and exercise the ACP, update the ACP as necessary to ensure preparedness, set goals, assign and monitor projects assigned to subcommittees and working groups, vote on issues, and represent all local, State, and Federal government entities participating in the AC.

AC 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 AC and ESG. Each non-regulatory participant in the Committee is aligned in one of the Advisory Groups: Industry, OSRO, Natural Resources, Media,
Volunteer, and Academia. The interests of the Advisors are conveyed to AC and discussed at the meetings.

**AC Coordinator Duties:** Facilitate AC meetings, record meeting minutes, draft meeting minutes for review by the AC Chairman and distribution by the Coast Guard, prepare meeting agenda notices for distribution to the AC 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.

**AC Members and Advisors Selection:** The ESG will select personnel to fill the AC vacancies. In addition, the ESG will select AC 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.

**AC Meeting Frequency and Location:** The AC meets bi-annually, although special meetings may be called when needed. Meeting locations will be alternated around the COTP Mobile area in order to balance interests.

### 1330 Charter Members

**Area Committee**
- ESG (FOSCs & SOSCs)
- Members (Voting & Decision Making Body)
- Advisors (Advise Members on Issues)

**Executive Steering Group**
- Chairman: Sector Commander, Sector Mobile
- Alternate: Deputy Sector Commander, Sector Mobile
- Vice Chairman: Mississippi State On-Scene Coordinator
- Vice Chairman: Alabama State On-Scene Coordinator
- Vice Chairman: Northwest Florida State On-Scene Coordinator

**AC Members**

**Federal Government**
- United States Coast Guard, Sector Mobile: (251) 441-5976
- NOAA Scientific Support Coordinator: (206) 549-7759
- National Marine Fisheries Service: (301) 436-8301
- U.S. Fish and Wildlife Service
  - Alabama: (251) 441-5181
  - Mississippi: (601) 965-4900
  - Florida: (850) 769-0552
- Environmental Protection Agency: (404) 562-8700
- Department of the Interior: (404) 852-5414
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 pre-designated FOSC in coordinating National, regional, local, 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 NRT, RRT, Area Committees, and responsible parties 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 UC consisting of the FOSC, the State’s OSC, and the RP. The UC 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. UC 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. UC 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 UC 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 UC 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 UC is used, an Incident Command Post and Joint Information Center shall be established. The Incident Command Post 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 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 AC. Composed of Federal, State, and local governmental representatives, the AC develops an 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.

1410.1 Incident/Spill of National Significance

A 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 Coast Guard Commandant or the EPA Administrator can declare a SONS considering 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 Coast Guard 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 clean-up.
- Significant public concern and demand for action.
- The existence of, or potential for, a high level of political and media interest.

A SONS classification provides additional support to the FOSC at the national level. Per 40 CFR 300.323 the Coast Guard Commandant holds the authority for declaring a SONS within the coastal zone. Some or all of the conditions below will exists when classifying a spill a SONS:

- A spill of size, magnitude, and/or complexity that presents a significant challenge(s) to the U.S. Coast Guard FOSC and the RRT.
- Local and regional resource coordination or the Unified Command’s incident management capability is exceeded.
- UC resource coordination capability is exceeded
- The pre-designated FOSC is requesting regional support from the Coast Guard District.
- The RRT is supporting the pre-designated FOSC in accordance with the Regional Contingency Plan.
- The Coast Guard LANTAREA is coordinating requests for the Coast Guard resources and support through Coast Guard PACAREA.
- The Coast Guard Office of Incident Management and Preparedness is coordinating with the NRT for interagency and international support.
- Multiple Unified Incident Command Posts (ICPs) have been established.
- One of 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 COMDTINST M3121.15.

1410.2 National Response Team (NRT)

The NRT consists of 15 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.

1420 Regional Response Team (RRT)

There are 13 RRTs, one for each of the ten Federal regions and Alaska, the Caribbean, and the Oceania region. 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.

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 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 ALMSNWFL COASTAL ACP geographical boundaries fall within the jurisdiction of RRT IV. Due to the boundary line being on Sector Mobile’s AOR line, RRTVI should be briefed on situations that could affect their region.

1430 RRT Structure

There are 13 RRTs, one for each of the ten Federal regions and Alaska, the Caribbean and the Oceania region. 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 FOSCs 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 FOSC. If the assistance requested by an FOSC 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 FOSC on the approval/disapproval of the use of chemical countermeasures.

1430.1 RRT IV

It is the policy of the RRT IV that the responding FOSC(s) will, when appropriate, integrate into an existing IMT if consistent with requirements of the Regional Contingency Plan and when directing response under the National Response System. In addition, it is the policy of RRT IV to provide for meaningful participation of the local, State, tribal responders, and the Responsible Party by establishing Unified Command.

It is the policy of RRT IV that response actions on non-Federal lands should be monitored or implemented by the most immediate level of government with the authority, and capability, to conduct such activities. In the inland zone, initial response is typically implemented by local government first responders. RRT IV recognizes that local government is a key emergency response mechanism to protect public health and environment for most emergencies under the National Response System.
1430.2 RRT 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 the EPA, for inland areas, and the USCG, for the coastal zone. These individuals coordinate all Federal containment, removal, disposal efforts, and resources during an incident. The FOSC will also coordinate Federal efforts with the local community response. Anyone responsible for reporting releases should be aware of which FOSC has responsibility for the affected area.

**Inland Areas:** Environmental Protection Agency, Region IV
- Atlanta, GA

**Coastal Areas:** United States Coast Guard
- Sector Mobile
- Sector St. Petersburg
- Sector Jacksonville
- Sector Miami
- Sector Key West
- Sector Charleston
- Sector North Carolina
- MSU Savannah

**Federal RRT Representatives**

- Environmental Protection Agency
- United States Coast Guard
  - District Five
  - District Seven
  - District Eight
- 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
- Department of Health and Human Services
  - Center for Disease Control
  - ATSDR
- Department of the Interior
- Department of Justice
- Department of Commerce
National Oceanic and Atmospheric Administration

- Nuclear Regulatory Commission
- Department of State
- Department of Transportation
- Department of Labor
  - Occupational Safety and Health Administration

State Representatives

- State of Alabama, Department of Environmental Management
- State of Mississippi, Department of Environmental Quality
- State of Florida, Department of Environmental Protection
- State of Georgia, Department of Natural Resources (Env’l Protection Division)
- State of Kentucky, Department of Environmental Protection
- State of North Carolina, Department of Environmental and Natural Resources
- State of South Carolina, Department of Health and Environmental Control
- Commonwealth of Tennessee, Division of Water Pollution Control

Associated Membership

- Mississippi Band of Choctaw Indians (Mississippi)
- Tribe Poarch Band of Creeks (Alabama)
- Seminole Tribe (Florida)
- Miccosukee Tribe (Florida)
- Eastern Band of Cherokee Indians (North Carolina)
- Catawba Indian Nation (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 jurisdictionally responsible agency make the decision to establish an Area Command.

The purpose of an Area Command is to oversee the management of multiple incidents, or to manage a very large or complex incident with multiple Incident Management Teams engages.

This type of Command is generally used when there are multiple incidents in the same geographical area, and requires similar resources or personnel. When incidents occur that are dissimilar, and do not require similar resources, it is feasible to utilize an Emergency Operations Center to oversee response efforts. In the event of a multi-jurisdictional response, Area Command should be established to allow each respective jurisdiction representation on the Command.

Area Command structure is similar to that of the standard ICS organization, however, Area Command does not stand up an Operations Section (see figure 1440-1).
The AC 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 UC 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 IAP. When a consensus cannot be reached, the FOSC has the ultimate decision-making authority. Members of the UC shall have jurisdiction over the incident, capability to respond, and on-scene decision making authority.

- **Unified Area Command:** The Unified Area Command has overall responsibility for setting response priorities and objectives, which are then carried out by field ICS/UC organization(s). For a very large single incident or multiple, simultaneous incidents involving a large number of resources and/or impacting a large geographical area, Unified Area Command may be established. The Unified Area Command has the responsibility to:
  - Set overall incident-related objectives and priorities.
  - Allocate critical resources based on priorities.
  - Ensure the incident/incidents are properly managed.
  - Ensure that incident objectives are met, and do not conflict with one another.
- **Tribal and Local Government On-Scene Coordinators:** The UC may incorporate additional tribal or local government on-scene coordinator(s) into the Command Structure as appropriate.

- **Responsible Party Command Structure:** The person(s) responsible for a spill incident shall utilize an Incident Management Team capable of rapidly, and readily integrating into the NIMS-based ICS/UC organization utilized by the ALMSNWFL COASTAL ACP signatory agencies.

- **Response Plan Approval:** The National Oil and Hazardous Substances Pollution 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.

### 1440.1 Federal/State Role in Incident Response

A basic premise of the ACP is that incidents are generally handled at the lowest possible jurisdictional 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 normally provide the first line of emergency response and incident management support.

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 FOSC

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, and are based upon 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 case and Responsible Party, initiate enforcement actions, and act for the FOSC as an on-scene representative. Additional responsibilities include, but are not limited to; ensuring containment clean-up and disposal are carried out adequately, notification to all Natural Resource Trustees, and the coordination of activities with Federal, State, tribal, and local agencies.

The EPA Emergency Response Program consists of emergency response FOSCs located in 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, clean-up, 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 FOSC, the EPA contractor will cooperate with on-site agencies but will take direction through the EPA FOSC only.

1440.3 State of Alabama Response Structure

Alabama Department of Environmental Management: 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 substances and is tasked with facilitating efficient response to discharges and releases of hazardous substances 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 substances 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, clean-up, 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 substances incidents include:

- Creating a State response that provides for the command, control, and coordination of hazardous material response operations and mutual aid
- Coordinating the dispatch and use of State hazardous material resources and provide the means of coordination with Federal and local government
- Providing a system for the receipt and dissemination of information, data, and directives pertaining to response activities among organizations responsible for hazardous substances incident response
- Collecting and disseminating information and intelligence relating to hazardous substances incidents.

1440.4 State of Mississippi Response Structure

Mississippi Department of Environmental Quality: MSDEQ, as directed by Title 49 of the Mississippi Code, is the lead State agency for response to oil discharges and 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, clean-up activities, and waste disposal. The Office of Pollution Control can also obtain pollution clean-up funding from the State Pollution Abatement Fund.

1440.5 State of Florida Response Structure

Florida Department of Environmental Protection: Personnel from the FDEP Office of Emergency Response (OER) 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 in an ICS Response. 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 a 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 (OPA90) 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 the vessel and facility owners and operators to identify and ensure the availability of, buy 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 (WCD) within the ACP boundaries.

1440.7.1 Off-Shore Facility Oil Spill Response Plan

Owners and/or Operators of an oil handling, storage, or transportation facility 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 (OSRP) can be found in 30 CFR Part 254. Coast Guard District Eight coordinates with BSEE Oil Spill Preparedness Division to conduct joint reviews of Gulf of Mexico OSRPs and to provide COTPs with WCD data semi-annually.

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 COTP. Section 4202(b)(4)(B) of OPA90 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 COTP. 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 to 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 to establish a performance document of standard.

UC/ICs can utilize these plans to assist with a response to a Tank of 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
- Fishing and Fish Tenders of not more than 750 Gross Tons
  - When only engaged 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 CGMTA amend sections 311(a) and (j) of the FWPCA to require the Coast Guard to issue regulations that require an Owner and/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 a discharge.

NVIC 01-05, Change 1 provides voluntary guidance to Owner(s) and Operator(s) 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

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 reviews and approves the plan. To provide consistency during 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/Facility Response Plans mandated by OPA90. A SOPEP provides guidance to the ship’s Master and Officer’s 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 on-shore oil pipeline could reasonably be expected to cause substantial harm to the environment by discharging oil into a navigable waterway of the United States, or adjoining shoreline. As such, Owners and/or Operators of on-shore pipelines must possess an Oil Spill Response Plan. Requirements pertaining to Pipeline Oil Spill Response Plans can be found in 49 CFR Part 194.

1440.8 National Responsible Party Policy

Under the FWPCA, as amended by OPA90, the Responsible Party has primary responsibility for clean-up or a discharge. Per FWPCA Section 311 and OPA90 4201, an Owner and/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) 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 person(s) providing personnel and equipment pursuant of 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 a 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, and to mitigate or prevent a substantial threat of such a discharge.
- Be updated periodically.
- Be resubmitted for approval following each significant change.
Each Owner and/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; 49 CFR Part 194 for Pipeline; and 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 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 (ALMSNWFL COASTAL ACP), 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 Responsible Party include, but are not limited to:

- Assessment of the discharge/release.
- Establishment of an Incident Command Post, in concurrence with the other On-Scene Coordinators (OSCs).
- Documentation/identification of type and quantity of oil or hazardous substance discharged/released.
- Containment of the oil or hazardous substance discharged/released and protection of the environment, with a particular emphasis on sensitive areas.
- Provisions of input relative to clean-up priorities (i.e. waste minimization)
- Timely and effective clean-up.
- 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/releases.
- Wildlife collection and care in conjunction with responsible local, State, and Federal agencies.

The Responsible Party has the opportunity to conduct damage assessments when required by the State/Federal agencies and/or when appropriate, given the Responsible Party’s available resources as determined by the Unified Command.

**1440.8.2 Responsible Party Conformation with the ALMSNWFL COASTAL ACP**

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 ALMSNWFL COASTAL ACP.

The requirement for vessel, on-shore facility, off-shore facility, and pipeline response plans to be consistent with the ALMSNWFL COASTAL ACP applies to:

- Contingency Plan: Content, Review, and Approval
- The execution and evaluation of spill drills and exercises.
- Management of spill response actions.

Failure to adequately conform to the ALMSNWFL COASTAL ACP may result in:

- Rejection of a spill contingency/response plan.
- Non-credit for a drill.
- Federal and/or State agencies assuming direct control of a spill response action.

However, it is also the policy of the ALMSNWFL COASTAL ACP that the UC will encourage the Responsible Party to maintain the primary responsibility for managing the response action so long as they:

- Actively and cooperatively participate in the UC structure.
- Provide an organization that is compatible with NIMS ICS.
- Provide regular communication and documentation that assures adequate response resources are being rapidly mobilized in proportion to the size of the incident (as discussed in the following section).
- 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 ALMSNWFL COASTAL ACP shall plan for an aggressive, timely, and efficient response to an incident in an effort to provide adequate equipment and trained personnel. If it is determined that excessive response resources are ordered, or mustered, they may be cancelled or demobilized to reduce the cost of the response action to the Responsible Party and responding agencies’.

To ensure an aggressive, timely, and efficient response the following must be taken into account:

- It is often difficult to obtain precise information pertaining to the quantity of oil or hazardous material discharged/released.
- Notification may be delayed.
- Some Responsible Parties may be conservative in estimating the quantity of oil spilled.
- Miscommunication can occur in regards to the number of personnel/equipment ordered, as well as expected arrival times.
- Response contractors may experience difficulty in mobilization.
- State and Federal On-Scene Coordinators may wary to deploy excess resources.
- Adequate response resources must be rapidly mobilized if initial source control, containment, and clean-up efforts are to be successful.
• If the Responsible Party fails to respond in a manner deemed reasonably consistent with this policy, and the ALMSNWFL COASTAL ACP, the FOSC or SOSC may assume the lead for a portion of, or the whole, response. The agency proposing to assume lead will coordinate with other members of the UC prior to taking such action.

In addition to the previously outlined benefits, rapid response is effective in ensuring that communities are safeguarded due to geographic and technological risks. Such risks include, but are not limited to:

• **Coastal Response:** Depending on the time year, coastal responses pose significant complications for response personnel. Once equipment arrives on-scene, the sea state and meteorological conditions (fog, wind, rain, etc.) may dramatically limit or terminate effective oil booming and on-water recovery efforts.

• **Shallow Marine Embayment Response:** Sensitive marine estuaries pose a significant risk in regards to intertidal shoreline clean-up through diversion and containment booming. 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 can cause extensive damage and are therefore seldom used.

• **Catastrophic Oil Spill Response:** Should a catastrophic oil spill occur, it is likely that there will not be adequate response resources in the Sector Mobile Area of Responsibility to manage and clean-up the spill. Therefore, the AC will rely in part on mutual aid from Gulf Coast States and other jurisdictions to provide 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 personnel in the use of the Incident Command System (ICS) during response operations. The IMH is intended to be used as a quick reference for responders, and is not a policy document. During the development of the IMH it was recognized that 80% of all response operations share common principles, procedures, and processes. The other 20% of response operations were unique to the specific incident. The handbook is designed to present all-hazards, generic information up front before delving deeper into incident, or position-specific, requirements. The IMH is divided into nine types of incidents/sections:

1. Terrorism
2. Maritime Security / Anti-terrorism
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 Terrorism, Maritime Security/ Anti-terrorism, and Event Management sections, each incident-specific chapter provides a scenario to illustrate how initial response develops into a large multi-agency response organization. The organization charts in each of the chapters are merely examples, and are in no way indicative of a set standard for response. Responders should have a basic understanding of ICS to ensure they can effectively operate within the ICS organization and properly use the IMH.

National Incident Management System (NIMS) ICS forms can be found at [http://www.uscg.mil/forms/ics.asp](http://www.uscg.mil/forms/ics.asp)

### 1460 Area Exercise Mechanism

The Federal On-Scene Coordinator shall periodically conduct drills assessing the removal capability, without prior notice, in areas for which the ALMSNFWL COASTAL ACP is required. This action will allow effective assessments of such plans, and relevant vessel/facility response plans. These drills may include participants from local, State, Federal, and industry stakeholders.

#### 1460.1 National Preparedness for Response Exercise Program (PREP)

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable exercise program which meets the intent of Section 4204(a) of OPA90, amending Section 311(j) of the FWPCA by adding a new subsection (6) and a new subsection (7) for spill response preparedness. PREP guidelines were updated in 2016.

The PREP 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 PREP is a unified, Federal effort and satisfies the exercise requirements of the Coast Guard, Environmental Protection Agency, the Pipeline and Hazardous substances Safety Administration (PHMSA) Office of Pipeline Safety, and the Bureau of Safety and Environmental Enforcement (BSEE). Completion of an exercise following the updated 2016 PREP guidelines will satisfy all OPA90 mandated Federal oil pollution response exercise requirements.

The 2016 PREP 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 2016 PREP Guidelines. The 2016 PREP represents the minimum guidelines for ensuring adequate response preparedness. If personnel within an organization believe additional exercises, or an expansion in scope of, the PREP exercises are warranted, they are highly encouraged to conduct these exercises.

The PREP 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 may arise from the evaluation of an exercise, and ensuring that changes are made as necessary.

1460.1.2 Participation in PREP

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 (i.e. vessel, marine transportation facilities, off-shore facilities, pipelines, etc). The PREP satisfies this requirement; however, it is a voluntary program. Plan holders are not required to follow the 2016 PREP guidelines and may develop their own exercise program that complies with the regulatory exercise requirements.

The 2016 PREP guidelines can be found online at [https://Homeport.uscg.mil/exercises](https://Homeport.uscg.mil/exercises)

(Select the “Port Level Exercises” link)

**Applicability:** The 2016 PREP is applicable to all industry response plan holders who elect to follow these guidelines.

Industry plan holders electing not to adopt the 2016 PREP 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, covering 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 that are required for all manned vessels and unmanned barges, per 33 CFR Part 155.1060.
1470 National Response Framework

In March 2011, Presidential Policy Directive 8 (PPD-8), National Preparedness, replaced Homeland Security Presidential Directive 8 (HSPD-8), National Preparedness. HSPD-8 was a companion directive to HSPD-5, Management of Domestic Incidents. HSPD-5 promulgated the development of a National Response Framework (NRF). The NRF third edition is a guide to how the Nation responds to all types of disasters and emergencies. It is built on scalable, flexible, and adaptable concepts identified in the National Incident Management System to align key roles and responsibilities across the Nation.

This Framework describes specific authorities and best practices for managing incidents that range from the serious but purely local to large-scale terrorist attacks or catastrophic natural disasters. The National Response Framework describes the principles, roles and responsibilities, and coordinating structures for delivering the core capabilities required to respond to an incident and further describes how response efforts integrate with those of the other mission areas. **This Framework is always in effect and describes the doctrine under which the Nation responds to incidents.** The structures, roles, and responsibilities described in this Framework can be partially or fully implemented in the context of a threat or hazard, in anticipation of a significant event, or in response to an incident. Selective implementation of National Response Framework structures and procedures allows for a scaled response, delivery of the specific resources and capabilities, and a level of coordination appropriate to each incident.

![Figure 1470-1 NRF Coordination Structure](image-url)
**Plans under the National Response Framework**

Figure 1470-2 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 are covered in existing plans under the NRF.

The National Response Framework and NIMS documents can be found online at [https://www.fema.gov/media-library/assets/documents/117791](https://www.fema.gov/media-library/assets/documents/117791)

**National Response Framework: Initial Response to Chemical Biological Radiological Nuclear and Explosive (CBRNE)**

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 substances incidents. However, terrorism response for biological agents and explosives may differ significantly from typical hazardous substances incidents. During initial response, the causation of an incident may be unclear and responders may not be able to immediately identify whether or not the incident was an accident or contained a terrorism nexus. Local responders will be the first to arrive on-scene to assess the situation and will take initial response actions to contain or stop the release, if possible.

A terrorist incident will always be treated as a crime scene, and the preservation of evidence is critical. Coordination between law enforcement and other responders is paramount in ensuring that the criminal investigation fluidly aligns with the hazardous material response, and vice versa. Although protection of life is paramount, the protection and processing of the crime scene is imperative in identifying and apprehending the perpetrators.

Response to a Weapon of Mass Destruction incident will include numerous agencies, and the AC should be prepared to provide resources under the National Response Framework. A major public health and environmental incident could be the result, or the intent, of this type of incident. The AC may be needed to address critical short-term issues while a larger response infrastructure is developed under the National Response Framework. Parallel response actions by the AC member agencies may be on-going during the National Response Framework activation.

**1480 Nuclear/Radiological Incident Annex to the NRF**

The Nuclear/Radiological Incident Annex (NRIA) to the National Response Framework 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. The NRIA applies to incidents where the nature and scope of the incident and scope of the incident requires Federal response to supplement the State, Tribal, and local incident response.
Currently, there is one active Nuclear Power Plant located within the Sector Mobile COTP Zone. The Joseph M. Farley Nuclear Electric Generating Plant is located along the Chattahoochee River, East of Dothan. The twin-unit nuclear power station sits on a 1,850 acre (7.4km²) site in Houston County, which is largely wooded and agricultural. Total nameplate generating capacity ≈ 1,720,000 k.

1490 MEXUS Plan and MEXUSGULF Annex

In the event an incident could affect or threaten the marine environment of Mexico, the USCG Federal On-Scene Coordinator (FOSC) or designated representative will immediately notify the Eighth District to discuss protocols with the MEXUSGULF Joint Response Team Regional Chair. The Eighth District Incident Management and Preparedness Advisor serves as the Regional Chair.

Additionally, the following links provide access to the MEXUS Plan 2017 and the MEXUSGULF Annex 2018. This Plan and Annex provide communication and coordination protocols (not tactical). USCG FOSC and staff personnel are encouraged to review and be familiar with the Plan and Annex contents; however, the Eighth District is responsible for international engagement under MEXUS.

1500 State/Local Response System

It is the policy of the State to assist the Federal On-Scene Coordinator in response to pollutant, or hazardous substance, spills. No State funds shall be expended for the removal of a coastal pollutant until Federal funds have been used to the maximum extent possible, or until Federal authorities have declined to expend Federal funds in a clean-up effort. It is the policy of the State to respond immediately to all oil spills, control the source, and to contain any discharge to the maximum extent possible. The use of oil spill clean-up agents shall be coordinated with the FOSC, and EPA representative to the RRT.

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 the effective and
immediate removal of a discharge/release, mitigation/prevention of a substantial threat of discharge/release, and the overall protection of human health and the environment.

1520 Coast Guard Policy

The U.S. Coast Guard will conduct a response that is consistent with the policy outlined in the National Contingency Plan and this Area Contingency Plan. The Coast Guard may elect to not dispatch representatives to discharges/releases where representatives of other government agencies are responding. However, if Federal removal is required within the coastal zone the Coast Guard will respond. If the Responsible Party is conducting proper removal, the Coast Guard FOSC will determine the need for the presence of Coast Guard personnel on-scene. In the event of a spill where there is no Responsible Party, or the response efforts of the RP are deemed inadequate, the Coast Guard may assume the responsibility for carrying out the response actions (partially, jointly through Unified Command, or completely). General Coast Guard policy for pollution response is provided in Volume VI of the Coast Guard Marine Safety Manual and U.S. Coast Guard Marine Environmental Response and Preparedness Manual, COMDTINST M16000.14.

1530 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, produce evidence, levy penalties, cancel or suspend activities, oversee safety, response, and removal preparedness. BSEE is also responsible for review and approval of Outer Continental Shelf (OCS) Oil Spill Response Plans (OSRP’s) and conducts Government-Initiated Unannounced Exercises.

1540 Department of Defense and Department of Energy Policies

In regards to the Department of Defense (DOD) and the Department of Energy (DOE) when a response to, or threat of, a release/discharge on DOD of DOE property or from a DOD/DOE property, those agencies shall provide FOSCs responsible for taking on all response actions. DOD will assume the removal response authority with respect to incidents involving DOD military weapons/munitions or weapons/munitions under the jurisdiction, custody, or control of the DOD.

1550 State Response System

The Mobile Area Contingency Plan encompasses the U.S. Coast Guard Sector Mobile COTP Zone (per Title 33 CFR 3.40-10). The State Response System is delineated based upon existing State boundaries between Mississippi, Alabama, and Florida.

1550.1 Alabama State Response System

The mission at the Alabama Department of Environmental Management (ADEM) is to assure for all citizens of the State a safe, healthful, and productive environment.
ADEM administers all major Federal environmental laws, including the Clean Air, Clean Water and Safe Drinking Water Acts and Federal solid hazardous waste laws.

For more information pertaining to the Alabama Department of Environmental Management, refer to the following link: http://www.adem.state.al.us/default.cnt

1550.2 Mississippi State Response System

The mission of the Mississippi Department of Environmental Quality is to safeguard the health, safety, and welfare of present and future generations of Mississippians by conserving and improving our environment and fostering wise economic growth through focused research and responsible regulation.

For more information pertaining to the Mississippi Department of Environmental Quality, refer to the following link: http://www.deq.state.ms.us/

1550.3 Florida State Response System

The Florida Department of Environmental Protection (DEP) protects, conserves, and manages Florida’s natural resources and enforces the State’s environmental laws.

The Department’s regulatory priorities include administering Florida’s air pollution control programs to best protect human health; protecting and restoring water quality; managing hazardous waste and clean-ups; overseeing beach restorations; and reviewing applications for power plants, transmission lines and natural gas pipelines. In addition, DEPs six District Offices ensure State-wide compliance with department rules. The Northwest District is responsible for incidents/events that occur within the Sector Mobile COTP Zone.

For more information pertaining to the Florida Department of Environmental Protection, refer to the following link: http://www.dep.fl.us/

1560 Local Response System

Local Chief Executive: A mayor or city/county manager 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; establishment of a curfew, direct evacuations, and order quarantine (in coordination with the local health authority).
- 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.
- 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 upon an informal Incident Command System. Due to the environmental sensitivity throughout the Sector Mobile Area of Responsibility, and the number of State and local response entities required to report/investigate discharges/releases, a notification and response system has been developed and implemented.

The primary organizations involved in response, and in monitoring or directing response efforts are:

- U.S. Coast Guard Sector Mobile
- Local Environmental Enforcement Agencies
- County Environmental Enforcement Agencies
- Local Fire Departments

For a maximum, most probable, or worst case scenario the UC will be established. Once established, responders may not choose to activate all Sections/Groups/Divisions/Units/etc.

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 released will drastically affect the FOSC’s response. Local fire department Hazardous substances (HAZMAT) Teams will typically secure the incident until a commercial team arrives.

1600 National Policy & Doctrine

United States Code Title 33 – Navigation and Navigable Waters

“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 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 a discharge.”

1610 National Response Doctrine

The National Incident Management System (NIMS) Incident Command System (ICS) 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/equipment resource tracking methods.

Under the NIMS Guidance, Incident Resource Typing for 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 Nation-wide. For example, the U.S. Coast Guard Sector will provide trained and qualified Type III Command and General Staff personnel as well as key Type III Division, Group, and Unit positions within the Sections.

Refer to Section 1600 National Policy & Doctrine for further clarification of the Federal On-Scene Coordinator Response Doctrine.

1620 Regional Response Doctrine

The Regional Response Doctrine is comprised of two principle components. These components are separated into two teams, standing and incident-specific.

Standing Team: Consists of designated representatives from each participating Federal agency, State government, and local government (as agreed by the State) of the RRT.

Incident-Specific Team: Formed from the Standing Team when the RRT is activated for response. On Incident-Specific Teams, participation by the RRT Member Agencies will relate to the technical nature of the incident and its geographic location.

Additional information pertaining to Regional Response Team IV can be found at the following link: http://www.rrt4.nrt.org

1630 Area Response Doctrine

Pursuant to the National Contingency Plan, Area Committees have been established for each area of the United States as designated by the President. The Area Committees are compromised 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 FOSC, are responsible for developing 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 AC ACP, and the Area Response Doctrine in regards to oil discharges and hazardous substance releases.

### 1640 Public vs. Private Resource Utilization

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 resources 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 Responsible Party, Qualified Individual, Incident Commander, or clean-up contractor has sought commercial resources and determined that those resources were unavailable.
- 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 (OPA90) 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 substances 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 OPA90, 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 will be used if the commercial industry does not have readily available resources, and only until such time that the FOSC or the UC 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.
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 substances, and for arranging for mitigation of an accidental discharge or release.

**Contractors:** Those who carry out response and clean-up in the event of a discharge/release.

**Government:** Those Federal, State, and local agencies with oversight responsibility for the safe handling of oil and hazardous substances, and for ensuring protection of the public and 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 be sure its own capability to achieve success. To do this kind of self-assessment, the community must be able to recognize success. Critical Success Factors are the specific tasks to be accomplished during a response in order to consider the evolution a success. An oil spill response that achieves all (or most) of these factors will, according to the Best Response precepts, be judged as a success.

1660 Clean-up Assessment Protocol

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 clean-up methods can be developed during planning stages, responders’ specific clean-up recommendations must utilize field data on shoreline habitats, type/degree of shoreline contamination, and spill-specific physical processes. Clean-up endpoints must be established early so appropriate clean-up methods can be selected to meet the clean-up objectives. Shoreline surveys must be conducted systematically because they are crucial components of effective decision-making. 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). These repeated surveys will provide a consistent taxonomy to ensure that a consistent evaluation of response procedures is carried out throughout the incident.

NOAA’s Shoreline Assessment Manual outlines methods to systematically survey affected areas to determine the appropriate methods to use in the spill response. Through a system known as SCAT (Shoreline Clean-up and Assessment Technique), field observers collect and evaluate the conditions on-scene and utilize those reports to support the response effort. SCAT Teams typically fall under the Planning Section on responses utilizing the Incident Command System.

The suspension of response actions during a spill response can be a difficult decision due to political, economic, or sociological concerns. The increasing cost of clean-up and the
potential for damage to the environment due to response actions must be considered prior to suspend clean-up operations. This decision is site-specific and differs between incidents. However, clean-up typically cannot be suspended while one of the following conditions exists:

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

Alternatively, clean-up may normally be suspended when the following conditions exist:

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

### 1670 Response Technologies

#### 1670.1 Dispersant Use

Preauthorized use of dispersants in Federal Region 4 is described in the RRT4 Dispersant Use Preauthorization Plan (DUPP). This plan provides a decision and action framework for the preauthorized application of dispersants to a surface oil spill. Preauthorized use of these tactics are geographically and operationally limited and includes important protocols designed for the protection of wildlife and other natural resources.

If the link to the Dispersant Use Preauthorization Plan (DUPP) fails, refer to the RRT IV Webpage under Plans.

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 misinformation was ultimately circulating in regards to 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 on a dispersant response. Therefore, FOSCs should plan for complications that are likely to preclude the usage of dispersants on spill where there is no viable Responsible Party.

Should an 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 the following:

- National Command Center – (202) 372-2100
  - Office of Maritime and International Law (CG-0941)
  - Prevention Law Division Duty Attorney
- USCG District Eight Command Center – (504) 589-6225
o District Eight Legal Attorney

Notification to the entities listed above should be made as soon as it is contemplated that dispersants will be used on any oil spill.

1670.2 In-situ Burn Approval / Monitoring / Decision Protocol

The RRT IV In-Situ Burn Plan outlines the pre-authorized use of in-situ burning in response to oil discharges occurring in ocean and coastal waters within the jurisdiction of the RRT IV.

If the link to the In-Situ Burn Plan fails, refer to the RRT IV Webpage under Plans.

1670.3 Bioremediation Approval / Monitoring / Decision Protocol

The RRT IV Bioremediation Spill Response Plan outlines the process by which the FOSCs in Region 4 may request authorization to use bioremediation in response to spills of oil or hazardous substances, defines the types of information necessary to determine if bioremediation is feasible, describes how to implement a bioremediation activity and determine if bioremediation is working.

If the link to the Bioremediation Spill Response Plan fails, refer to the RRT 4 Webpage under Plans.

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 UC to address critical questions:

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

1670.5 Alternative Response Tool Evaluation System (ARTES)

During an oil spill or hazardous substance release, the On-Scene Coordinator 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 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

Also known as the Hazardous Substance Superfund as defined by 42 USC 9601 et. seq., the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted by Congress in 1980. Its purpose is to provide for liability, compensation, clean-up, and emergency response for hazardous substances, pollutants, or contaminates (as defined by statute) released into the environment, and the clean-up of inactive hazardous waste disposal sites. Under CERCLA emergency and time critical actions for pollutants or contaminant 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 contaminates.
- Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- Hazardous substance, pollutant, or contaminates in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.
- High levels of hazardous substance, pollutant, or contaminates in soils largely at, or near, the surface that may pose a threat of release.
- Weather conditions that may cause hazardous substance, pollutant, or contaminates to migrate or be released.
- Threat of fire or explosion.
- The availability of other appropriate Federal or State response mechanisms to respond to the release.
- Other situations or factors that may pose threats to the 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 (and listed in 33 USC 1251), the objective of the Act is to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters. The overall 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 while providing for recreation in and around those waters.
- Prohibits the discharge of toxic pollutants.
- Provide 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.
• 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 Department of the Interior 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 clean-up and staging area constriction) 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 AC 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, State, and tribal 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 clean-up teams are to remain on beaches.

1680.4 Endangered Species Act (EAC)

Oil spills or hazardous substance release response actions may impact species listed as “endangered” or “threatened” under the Endangered Species Act (ESA), 50 CFR 402.02. 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 following agencies signed an Interagency Memorandum of Agreement (MOA) regarding Oil Spill Planning and Response Activities under the Federal Water Pollution Act’s National Oil and Hazardous Substances Pollution National 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 measure that could be implemented during the response to reduce or avoid impacts to listed species, the paperwork associated with emergency consultation 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, the NOAA SSC, and DOI Regional Environmental Officer can help identify appropriate ESA Section 7 consultation contacts for their respective Departments.

For ESA Consultation Contacts:

- U.S. Department of the Interior
  - Regional Environmental Officer – (404) 852-5414
- NOAA
  - SSC – (206) 549-7759

For more information in regards to the rescue of wildlife, refer to Section 9240 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 USC 6901 et seq. Congress declared it to be a 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 USC 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.
- Promote efforts which will prevent or eliminate damage to the environment and biosphere, and stimulate the health and welfare of man.
• Enrich the understanding of the ecological systems and natural resources important to the Nation.
• 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:

*Parties 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 pollution or threat of pollution of the sea by oil, following upon a maritime casualty or acts related to such a casualty, which may reasonably be expected to result in major harmful consequences.*

*However, no measures shall be taken under the present Convention against any warship or other ship owned or operated by a State and used, for the time being, only on government non-commercial service.*

For more information pertaining to High Seas Policy, refer to 33 USC 1471 et seq.
2000 Command Staff – Incident Command System

2100 UC

The UC is a structure that brings together response personnel from all major organizations that have jurisdictional authority for the incident to coordinate an effective response while carrying out their own organization’s jurisdictional responsibilities. A UC links responding organizations to the incident and provides them a forum to make decisions together. Under a UC, organizations should blend together throughout the ICS organization to create an integrated response team.

To be a member of the UC, a participating organization must have underlying statutory authority, or legal obligation, to carry out proposed response actions and have jurisdiction within the area affected by the incident. Members of the UC may also include agencies, organizations, private industries, or owners and operators of waterfront facilities and vessels bringing large amounts of tactical and support resources to the table.

The need for a UC typically arises when incidents:

- Cross geographic boundaries (multiple States, international boundaries, etc.)
- Involve various levels of government (local, county, State, Federal, tribal, etc.)
- Involve a vessel or facility (e.g., Responsible Party for a pollution threat)
- Involve a private industry.
- Impact multiple functional responsibilities (e.g. SAR, fire, oil spill, EMS, etc.)

To be considered for a UC position, the involved organization:

- Must have jurisdictional authority, or functional responsibility, under a law or ordinance for the incident.
- Must have incident, or response operations, impact on the organization’s Area of Responsibility.
- Must be specifically charged by law or ordinance with commanding, coordinating, or managing a major aspect of the incident response.
- Should have full organization authority to make decisions and execute all of the tasks assigned to the Incident Commander on behalf of their organization.
- Should have the resources to support participation in the response organization.

For more information pertaining to UC, refer to the United States Coast Guard Incident Management Handbook (2014) or access the following site: https://homeport.uscg.mil/ics
2110 Incident Commander (IC)

2110.1 Federal Representative

The first Federal official affiliated with a NRT member agency to arrive at the scene of a discharge should coordinate activities under the National Contingency Plan (NCP). This official is authorized to initiate, in consultation with the FOSC, any necessary actions normally carried out by the FOSC until the arrival of the pre-designated 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 source and cause.
- Identify Responsible Parties.
- Identify the nature, amount, location, and trajectory of discharged materials.
- Determine whether the discharge is a Worst Case Discharge.
- Identify pathways to human/environmental exposure, including the potential impact on human health, welfare, and safety.
- Identify the potential impact on natural resources and property.
- Discuss priorities for protecting human health, welfare, and the environment.
- Ensure appropriate resource documentation.
- Ensure prompt notification to Natural Resource Trustees, and consult with affected parties in regards to appropriate removal actions.
- Consult with the RRT IV, when necessary, in carrying out the requirements of the NCP and keep the RRT IV 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 IV and other appropriate agencies as the situation progresses.
- Ensure that all appropriate public and private interests are kept informed and that their concerns are considered throughout a response, to the extent practicable.

United States Coast Guard

In accordance with the National Contingency Plan (40 CFR 300.120), Commander, USCG Sector Mobile shall serve as the pre-designated FOSC 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 the Department of Energy (DOE). During such incidents, the DOD or DOE shall serve as the FOSC 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, and Commander, Sector Mobile may serve as the Incident Commander for the local response efforts within the incident-specific response organization.
Environmental Protection Agency

The Environmental Protection Agency shall serve as the pre-designated FOSC for oil discharges and hazardous substance releases in the inland zone. The EPA Emergency Response Program consists of emergency response FOSCs located in the Regional Office located in Atlanta, GA. Refer to the EPA MOU for specific guidance on inland and coastal zones.

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-led response action, and coordinating with any other State agencies as appropriate. For the ALMSNWFL COASTAL ACP region, this official may come from the State(s) of Alabama, Mississippi, or Florida (depending on jurisdiction) and act as the SOSC in the UC.

The SOSC is responsible to ensure all pertinent resource, cultural, archaeological, environmental, economic issues, 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.

Since State and local public safety organizations may be the first representatives’ on-scene during a discharge/release they are expected to initiate public safety measures that are necessary to protect public health and welfare that are consistent with containment and clean-up requirements in the National Contingency Plan (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 OSLTF unless a Pollution Removal Funding Authorization (PFRA) has been completed between the FOSC and local government representative.

2110.3 Local Representative

When a local jurisdiction holds interest in an incident they will communicate concerns to the UC via the Liaison Officer or the State On-Scene Coordinator, or who may be assigned to another position in the response organization.

2110.4 Responsible Party Representative

Under OPA90, the Responsible Party has primary responsibility for clean-up of a discharge. The response shall be conducted in accordance with their applicable response plan; Section 4201(a) of OPA90 states that an owner or operator of a tank vessel or facility participating in removal efforts shall act in accordance with the National Contingency Plan (NCP), and the applicable Response Plans, as required.

In accordance with Section 4202 of OPA90, these Response Plans shall be consistent with the requirements of the NCP and Area Contingency Plans (ACPs). 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, are located in 33 CFR Parts 154 and 155, respectively.

As defined by OPA90, each Responsible Party of a vessel or a facility from which oil is discharged, or poses a substantial threat of a discharge, into or upon the navigable waters, adjoining shorelines, or the Exclusive Economic Zone 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 National Contingency Plan (NCP), the Regional Contingency Plan (RCP), the Mobile Area Contingency Plan (ALMSNWFL COASTAL ACP), and the applicable response plan required by OPA90. 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 CERCLA of 1980 (CERCLA) (42 USC 9601 et seq.)

2120 Guidance for Setting Response Objectives

Response Objectives outline the IC/UC’s desired outcomes. The IC/UC sets incident objectives that are:

- Specific
- Measurable
- Attainable
- Realistic
- Time-sensitive

The objectives are also flexible enough to allow for strategic and tactical alternatives.

2120.1 Discovery and Notification

Reports of an actual or potential oil discharge may come from a variety of sources including, but not limited to:

- Vessels
- Facilities
- Aircraft
- Private Citizens
- Other Governmental Agencies
- Media
- National Response Center (NRC)

The FOSC ensures notification of the appropriate State agency which is, or may reasonably be expected to be, affected by the discharge. Section 9100 Emergency Notification and Section 9200 Personnel and Services Directory provide guidance and contact information 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 Regional Contingency Plan. 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. It is beneficial to utilize a chart of the area that outlines the greatest detail possible.

Evaluate the actual, or threatened, discharge’s magnitude and severity, and assess the effectiveness of possible removal operations. This may require on-scene verification, evaluation, determining a hazard/area environmental vulnerability assessment, and an over flight to determine the size, location, and movement of the discharge. The FOSC should base an assessment on the objective consideration of these factors. If a discharge threatens the environment, determination of how substantial the threat is can be done through the Federal Water Pollution Control Act guidelines. The utilization of Federal funds may depend on such a determination. The optimum time for completing an evaluation is within one hour or 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.
- 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:

- Investigate
- 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.
- Determine if the Responsible Party can achieve effective removal, mitigation, or prevention. If so, determine whether removal is being done properly.
- Determine, where appropriate, whether the State or political subdivision has the capability to carry out any, or all, removal actions.
- Make prompt notification to trustees.

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

- Whether clean-up or preventative actions are necessary.
- Is RRT activation is required?
- Are additional resources are needed?
- Is the Responsible Party is taking responsibility for the clean-up operation, and is the response immediate/effective?
- Are containment, countermeasures, clean-up, and disposal required?

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

<table>
<thead>
<tr>
<th>Coastal Waters (USCG)</th>
<th>Inland Waters (EPA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor</td>
<td>Minor</td>
</tr>
<tr>
<td>Less than 10,000 gallons</td>
<td>Less than 1,000 gallons</td>
</tr>
<tr>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>10,000 – 100,000 gallons</td>
<td>1,000 – 10,000 gallons</td>
</tr>
<tr>
<td>Major</td>
<td>Major</td>
</tr>
<tr>
<td>Greater than 100,000 gallons</td>
<td>Greater than 10,000 gallons</td>
</tr>
</tbody>
</table>

*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”.*

Figure 2120-1: Oil Discharge Classifications

2120.3 Containment, Countermeasures, Clean-up, and Disposal

Containment, countermeasures, and clean-up are classified as 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 pollution.
- Mitigating the effects of the pollution.

Mitigating the pollution’s effect may include recovering oil from the water and affected lands. This recovery may require the utilization of sorbents or oil skimmers, either through clean-up contractors or prepositioned resources. The FOSC must ensure that the Responsible Party is cleaning up the spill promptly, effectively, and is mitigating the effects of the discharge. If the Responsible Party fails to meet these expectations, the FOSC must assume Federal responsibility and hire/supervise the clean-up contractor.

The FOSC must recognize that each habitat, or milieu, possesses unique qualities which may require different clean-up techniques to accomplish the following:

- Remove as much of the pollutant as possible, while minimizing environmental damage from the clean-up technique.
- Weigh these goals against such constraints as the technology, equipment, and personnel available.

While recoverable quantities of oil should be contained/removed if practical, oftentimes immediate containment is not possible, necessitating a shoreline clean-up. Nonetheless, clean-up forces should examine the feasibility of open water containment and removal—especially if they can achieve containment before a potential spill becomes an actual spill.
Dispersants, or chemicals, may mitigate pollution damage more effectively than mechanical methods. The National Contingency Plan’s (NCP) 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 the existing Regional Response Team IV (RRT) policy.

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

- Will clean-up activities cause more damage than leaving the oil to natural recovery or dissipation?
- Will clean-up activities severely disrupt shoreline bird and 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?
- If on the surface of the substrate, is it likely to remain there?
- 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 and authorizes termination of operations. Where uncertainty exists, the FOSC may seek the advice of the RRT in making this determination. Generally, removal of oil discharges 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.
- Further removal operations would cause more environmental harm than the oil to be removed.
- Clean-up measures would be excessively costly in view of their insignificant contribution to minimizing a threat to the public health, welfare, or the environment.
- Activities required to repair unavoidable damage resulting from removal actions have been performed.

Oil revered in clean-up operations shall be disposed of in accordance with the Regional Contingency 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 oiled debris.
- Segregation and stockpiling of recovered oil and oiled debris.
- Prior State disposal approvals and permits.
- Routes, methods, 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 Federal Water Pollution Control Act (FWPCA). For a spill in which the Federal government assumes responsibility for clean-up operations, documenting Federal response efforts is essential to recover costs from parties responsible for the spill to replenish the revolving fund. Documentation serves several other purposes as well:

- Situation Reports inform response personnel at other organizational levels and agencies.
- Provides evidence to support imposing civil or criminal sanctions.
- Documents Federal expenditures to recover costs from the Responsible Part.
- Documents OSC decisions and actions throughout the incident.
- Forecasts program resource levels needed for pollution response.

**2130 Incident Objectives**

Typical operational objectives for initial response include (in no particular order), but are not limited to:

- Confirm the existence and extent of the spill/release.
- Secure the source of the spill.
- Evaluate the extent of the 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 on-scene.
- Ensure the safety of responders and the public.
- Establish a defined response organization.

Typical operational objectives for the first Operational Period include (in no particular order), but are not limited to:

- Fully evaluate/reconnaissance the extent of contamination.
- Implement the UC organization and verify operations are being conducted in conformity with the National Incident Management System.
- Ensure the safety of responders and the public.
- Secure the source of the spill.
- Initiate contact with local municipalities and establish communication channels.
- Establish a Joint Information Center, prepare press releases, and conduct regular briefings with the media.

**2135 General Response Priorities**

General response priorities, as outlined in the National Contingency Plan are:

- 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 ensuring the safety of personnel.
• Stabilizing the situation to preclude the event from worsening. 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, removing the remaining oil from the container to prevent additional oil spillage, reduce the need for follow-up response action, and to minimize adverse impact to the environment.
• 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.
• 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 incident-specific bases.

2140 Area Specific Response Objectives

The following objectives are applicable examples to this plan. They can be used as is, or can be modified in incident-specific applications. The following objectives are not all encompassing and are provided as a guide for response personnel.

Safety
• Provide for the safety and welfare of citizens and response personnel.
• Provide for the safety and security of responders, and maximize the protection of the public health and welfare.
• Identify safety and risk management factors for response personnel, and the public.
• Conduct Operational Risk Management (ORM) and ensure controls are in place to protect response personnel, and the public.

Fire/Salvage
• Assess damage/stability, and develop a salvage plan.
• Implement the salvage and tow plan.
• Extinguish the fire.

Waterways Management
• Conduct port assessment and establish priorities to facilitate commerce.
• Develop/implement transit plan to include finals destination/berth(s) of vessels.
• Identify safe refuge/berth for impacted vessels.
Oil and Hazardous Substance

- Control the source and minimize the volume discharged/released.
- Determine oil/hazardous substance trajectories.
- Identify sensitive areas, develop strategies for protection, and conduct pre-impact shoreline debris removal.
- Conduct an assessment and initiate shoreline clean-up efforts.
- Remove product from impacted area.
- Contain, clean-up, recover, and dispose of spilled product(s).

Environmental

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

Management

- Evaluate all planned actions to determine potential impacts on social, economical, and political entities.
- Ensure appropriate financial accounting practices are established and adhered to.
- Establish internal/external resource ordering procedures are established and adhered to.
- Establish an appropriate structure to facilitate communications with stakeholders and agency/organization facilities.

2150 Incident Command System: Area Command

The purpose of an Area Command is to oversee the management of an incident, focusing primarily on strategic assistance and direction, and resolve competition for scarce response resources. An Area Command is activated depending on the complexity of the incident and incident management span-of-control considerations. This organization does not supplant an IC/UC, but supports it by providing strategic direction and oversight of incident management. An Area Command also prioritizes incident activities, allocates or re-allocates critical resources to support identified needs, and ensures incident information is distributed appropriately. Execution of tactical operations and coordination remains the responsibility of the on-scene IC/UC as does setting incident objectives and managing incident-specific objectives and managing incident-specific tactical operations and support.

The structure of the Area Command follows the standard ICS organization, with the exception of the Operations Section.
The UC for an oil discharge in the marine environment includes:

- FOSC
- Qualified Individual / Incident Commander (Responsible Party)
- SOSC
- Other Federal trustees as applicable by law or regulation (e.g. NOAA SSC)

The UC is responsible for overall management of an incident. The UC directs incident activities including the development and implementation of incident objectives, strategies, and approves ordering and release of resources. The UC members are expected to:

- Agree on incident priorities, decisions, response organization, assignments, and procedures.
- Commit to speak with “one voice” through the Public Information Officer (PIO) or Joint Information Center (JIC), if established.
- Have the authority to commit organization resources and funds, assign agency resources, and authorize the release of public and inter/intra-agency information about the incident.
- Have the capability to sustain a 24/7 commitment to the incident.
- Possess a cooperative attitude.
- Have a thorough understanding of the incident and ICS Operational Planning Cycle.

The Command Staff typically contains the following positions:

- **Deputy IC / FOSC**
- **Safety Officer**
- **Liaison Officer**
- **Public Information Officer**
- **Legal Officer**
2160.1 Deputy **FOSC**

The Deputy FOSC must have the same qualifications as the IC, as they must be ready to take over that position at any time. When span of control becomes an issue for the IC, a Deputy IC may be assigned to manage the Command Staff.

2160.2 Safety Officer

The Safety Officer (SOFR) is to develop and recommend measures to ensure personnel safety and occupational health of not only response workers, but also the public, and to anticipate, recognize, assess, and control hazardous and unsafe conditions or situations.

There will only be one SOFR assigned for an incident; however, the SOFR may have Assistant Safety Officers (ASOFS) or Technical Specialists as needed. ASOFS may be ordered or requested due to a specific skill set they possess, and which is required during incident response.

To accomplish all of these functions the SOFR and/or support staff should frequently travel to operational areas, base camps, staging areas, and other locations involving incident activity to identify health and safety hazards, and to verify compliance with applicable Federal, State, and local health and safety regulations.

The major responsibilities of the SOFR include:

- Identify hazardous situations associated with the incident.
- Review the IAP for safety and occupational health implications.
- Provide safety and occupational health advice in the IAP for assigned responders.
- Use Risk Based Decision Making (RBDM) methodologies to conduct Operational Risk Management (ORM) for the incident.
- Develop and implement intervention measures to prevent unsafe acts.
- Investigate accidents that have occurred within the incident area and determine if new safety and occupational health measures are needed.
- Track and report accidents, injuries, and illnesses.
- Support reporting of accidents using the ICS 237-CG (Incident Mishap Reporting Record).
• Review and provide input to the Medical Plan (ICS 206)
• Review and provide input to the traffic plan for both land and vessel traffic.
• Develop the IAP Safety Analysis (ICS-215a)

Additional responsibilities of the Safety Officer can be found in Section 2200.

2160.3 Liaison Officer

The Liaison Officer (LOFR) is a conduit of information and assistance between organizations, and does not normally have delegated authority to make decisions on matters affecting an organization’s participation in the incident; however, the IC or UC may assign additional responsibilities or authorities to the LOFR in order to effectively manage complex incidents.

Due to the complexity and scope of the incident, the LOFR may require one or more Assistance Liaison Officers (ALOF) in the Incident Command Post (ICP) or field in order to maintain a manageable span of control.

The major responsibilities of the Liaison Officer include:

• Serve as the primary coordinator for the Liaison network, including Agency Representatives (AREP) and State, tribal, and local governments.
• Maintain a list of Assisting and Cooperating AREPs, including name, agency, and contact information.
• Assist in establishing and coordinating interagency contacts.
• Assist in the development of the Information Management Plan.
• Develop stakeholder coordination plan, including periodic public meeting schedules.
• Keep organizations supporting the incident aware of the incident status.
• Arrange consultations with Federally-recognized tribes as appropriate.
• Coordinate activities of visiting dignitaries.

Additional responsibilities of the Liaison Officer can be found in Section 2400.

2160.4 Public Information Officer

The Public Information Officer (PIO) is responsible for developing and releasing information about the incident to the media and public. Only one PIO will be assigned for each incident, including incidents operating under UC and multi-jurisdictional incidents.

The PIO may have assistants as necessary, and he assistants may come from other assisting organizations.

The major responsibilities of the PIO include:

• Develop media strategy and public information plan.
• Represent and advise the IC/UC on all public information matters relating to the incident.
- Develop material for use in media briefings.
- Obtain IC approval of media releases.
- Inform media and conduct media briefings.
- Monitor and utilize social media as approved by the IC/UC.
- Arrange tours, interviews, and briefings.
- Coordinate information sharing and distribution with the Liaison Officer.
- Manage the Joint Information Center (JIC) if established. Recommend use of the NTR JIC Model.
- Maintain current information summaries and/or displays on the incident and provide this information to assigned personnel.

Additional responsibilities of the Public Information Officer can be found in Section 2300.

2160.5 Legal Officer

The responsibilities of the Legal Officer include providing legal advice to the IC / UC in response decision-making.

2200 Safety Officer

The Safety Officer (SOFR) is responsible for monitoring and assessing hazardous and unsafe situations as well as 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 within the IAP. Further guidance on the development of a Site Safety Plan can be found in Section 9300.

The SOFR may assemble a team of Assistant Safety Officers and Safety Observers as 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:

- Oil Spill Removal Organization 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 SOFR responsible to ensure all support and administrative activities are conducted.

For additional information pertaining to the roles/responsibilities of the Safety Officer refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)
2200.1 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 Administrators (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 clean-up operations at uncontrolled hazardous waste treatment, storage, and disposal operations conducted under the Resource Conservation and Releases Recovery Act of 1976 (RCRA). The regulations also apply to emergency response and post-emergency clean-up of hazardous substances. The definition of hazardous substance used in these regulations is much broader than the CERCLA; OSHA encompasses all CERCLA hazardous substances, RCRA hazardous waste, and all Department of Transportation (DOT) hazardous substances listed in 49 CFR Part 172. Thus, most 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 clean-up. For the regulations to apply there must be an operation that involves employee exposure or a reasonable possibility for employee exposure to safety or health hazards. For example, a beach clean-up worker collecting surface residual 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, they should be consulted to determine the applicability of OSHA regulations. Disputes should be referred to the Department of Labor representative on Regional Response Team IV (RRT). The individual developing 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.

2200.2 Training Requirements

Response employees shall be trained for emergency response prior to being called upon to perform in a real incident. Training shall include the elements of an emergency response plan, organizational standard operating procedures, required personal protective equipment (PPE), and emergency procedures.

Training shall be based on the duties and functions to be performed by each responder of an emergency response organization. Incident-specific skills and knowledge shall be conveyed to all new responders before they are permitted to take part in emergency operations on an incident.
Occupational Safety and Health Administrators (OSHA) has recognized the need to remove oil from the environment and has empowered the OSHA Representative to the Regional Response Team IV (RRT) to reduce the training requirement to a minimum of 4 hours for responders engaged in post-emergency response operations. This reduced training requirement applies to the U.S. Coast Guard and the private sector. Additional 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 prior to conducting response operations. 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 clean-up operations. Training requirements may vary from State to State, and 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 or discharge, 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:

- **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.

- **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.

- **Required Information** – The following information, to the extent available, shall be obtained by the employer prior to granting employees access to a site:
  - Location and approximate size of the site.
  - Description of response activity and/or the job task to be performed.
  - Duration of the planned employee activity.
  - Site topography and accessibility by air and roads.
  - Expected safety and health hazards on-site.
  - Pathways for hazardous substance dispersion.
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.

Expected hazardous substance and health hazards on-site, and chemical/physical properties thereof.

- **Personal Protective Equipment (PPE)** – Personal protective equipment shall be provided and used during initial site entry in accordance with the following requirements:
  - Based upon the preliminary site evaluation, an ensemble of PPE shall be selected and used during initial site entry which will provide the appropriate level of protection below permissible exposure limits. 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.
  - If positive-pressure self-contained breathing apparatus (SCBA) is not used as a part of the entry ensemble, and if respiratory protection is warranted based upon the preliminary site evaluation, an escape of SCBA of at least five minutes duration shall be carried by employees during initial site entry.
  - 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.
  - Once the hazards of the site have been identified, the appropriate PPE shall be selected and used in accordance with this section.

- **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:
  - Monitoring with direct reading instruments for hazardous levels of ionizing radiation.
  - Monitoring the air with appropriate direct reading test equipment (ie. combustible gas meters, detector tubes) for IDLH and other conditions that may cause death or serious harm (combustible or explosive atmospheres, oxygen deficiency, or toxic substances).
  - Visually observing for signs of actual or potential IDLH or other dangerous conditions.
  - An ongoing air monitoring program, in accordance with this section, shall be implemented after site characterization has determined the site is safe for the start-up of operations.

- **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

- **Employee Notification** – Any information concerning the chemical, physical, and toxicological properties of each substance known or expected to be present on that site, that is available to the employer and relevant to the duties of an employee, shall be made available to the affected employees prior to the commencement of work activities.

Additional guidance for site characterization can be found in the 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 (SSP) must be developed before site activities can precede. The SSP must provide measures to minimize accidents and injuries that may occur during normal, daily activities or during adverse conditions (severe weather, increase/decrease in temperature, etc). Development of a written SSP helps ensure that all safety aspects of site operations are thoroughly examined prior to commencing field work. The SSP should be modified as needed for every stage of activity. The SSP is intended to meet the requirements of the Hazardous Waste Operations and Emergency Response regulation (29 CFR 1910.120).

An initial SSP should be developed so the preliminary site assessment can proceed in a safe manner. The ICS-208 Form and Form A – Emergency Safety and Response Plan may be used for this purpose. The information provided from this assessment can be used to refine the SSP to ensure that site activities can proceed safely. Plans should be revised whenever new information pertaining to site hazards is obtained. Development of the SSP should involve both the off-site and on-site management, and should be reviewed by occupational and industrial health and safety experts, physicians, chemists, or other appropriate personnel.

To ensure that the SSP is being followed, the SOFR or designated assistants should conduct a safety meeting at the start of the work day, prior to initiating any site activity, and following the 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.
- Receive worker feedback on conditions affecting safety and health.
- Evaluate the effectiveness of the Site Safety Plan.

The SOFR should also conduct frequent inspections of site conditions, facilities, equipment, and activities to determine whether the SSP is adequate and being followed.
The ICS Site Safety Plan, and sample templates can be found at:
https://homeport.uscg.mil/ics

2230 Operational Risk Management (ORM)

2230.1 Terms/Definitions

**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/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 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. Exposure is expressed in time, proximity, volume, and repetition.

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

**Hazard:** Any real or potential condition that can endanger a mission or cause personal injury, illness, death, and/or damage to equipment/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 Risk Assessment step. Various response communities and activities should use the safety industry’s standard terms of low, medium, and high when discussing risks 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), and 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 Operational Risk Management (ORM) Process:
• A decision-making tool used 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 or responsibility that corresponds 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 prior to driving, or can be as complex as coordinating a Safety Brief prior to executing a complex hazardous substances mission.

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 including:

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

• **Accept Necessary Risks 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 taken when decision-makers clearly acknowledge that 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-level 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. Commanders 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 Continuously Evaluated:** 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, and responders should ensure risk is minimized through the following:
  o **Define the mission tasks** – By reviewing the current and planned operations through describing the mission at hand. To assist with this step, responders should construct a list or chart depicting major phases of the operation/task.
o **Identify and define the potential hazards** – The key to successfully analyzing risk is carefully defining the hazard. This step involves identifying potential failures, or things that can go wrong.

o **Assess the risks** – 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/mission. To assess risk a Green-Amber-Red (GAR) Model or a Severity-Probability-Exposure (SPE) Model may be generated. To avoid potential controversy, pre-consider the perceived and expected value of a loss.

o **Identify hazard control options** – Starting with the highest risk hazard identified in the previous steps, identify as many risk control options/safeguards as possible. Determine each options impact on mission/unit goals and select the best alternative(s). Risk control options include: Spread out, Transfer, Avoid, Accept, and Reduce (STAAR). Effective risk management strategies address the risks components of severity, probability exposure. Risk mitigations include, but are not limited to: training, safe work practices, and utilization of PPE.

o **Evaluate risk vs. gain:** 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/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.

- **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.

- **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 Severity, Probability, Exposure (SPE) Risk Assessment Model**

The SPE Model assesses risks for specific hazards. In this model, Risk = Severity x Probability x Exposure.

<table>
<thead>
<tr>
<th>SPE Risk Assessment Model</th>
<th>1-19 (Slight)</th>
<th>20-39 (possible)</th>
<th>40-59 (Substantial)</th>
<th>60-79 (High)</th>
<th>80-100 (Very High)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Action</td>
<td>Attention Needed</td>
<td>Action Required</td>
<td>Action Required</td>
<td>Action Required</td>
<td>Action Required</td>
</tr>
</tbody>
</table>

60
Each area is given an overall number (1-5) and multiplied together. This final product is then correlated with a set of values that assign risk.

2230.5 GAR Risk Assessment Model

The Green, Amber, Red (GAR) Model can address more general risk concerns involving planning, operations, or reassessing risks as milestones are met within plans. These GAR Model elements include:

**Supervision:** Supervisory control should consider how qualified a supervisor is, and his/her level of involvement in the evolution. Even if an individual 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.

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

**Team 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.

**Team 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.

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

**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 an evolution.

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 compile the total risk score for each hazard.

If a risk value falls within the Green zone, the risk is rated as low. A value in the Amber zone indicates moderate risk, and responders should consider adopting procedures to
minimize it. If the total value falls within the Red zone, implement measures to reduce
the risk and reevaluate before starting the event or evolution.

<table>
<thead>
<tr>
<th>GAR Model</th>
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</thead>
<tbody>
<tr>
<td>Green</td>
</tr>
<tr>
<td>Amber</td>
</tr>
<tr>
<td>Red</td>
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</tbody>
</table>

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 highest to lowest risk to target areas of the greatest concern.

2230.6 ORM Implementation

The SOFR should ensure that the ORM process is utilized; however, ORM is the
responsibility of all response personnel. 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 the Incident Command System.

A downloadable version of the 215A can be found at https://homeport.uscg.mil/ics

2300 Public Information Officer (PIO)

When an incident occurs, it is imperative to give the public prompt, accurate information
on the nature of the incident as well as the current response actions. The FOSC and
community relations personnel should ensure that all appropriate public and private
interests are kept informed and that their concerns are considered throughout the
response. The FOSC (or community relations personnel) should coordinate with available
Public Affairs resources to carry out this responsibility by establishing a Joint
Information Center (JIC) to bring together Federal and State agencies as well as the
Responsible Party per 40 CFR 300.155.

The Public Information Officer (PIO) is responsible for developing and releasing
information about the incident to the media, incident personnel, and to other
agencies/organizations.

2310 Joint Information Center (JIC)

Establishing an initial site for the Joint Information Center (JIC) facilitates the rapid
dissemination of initial incident information.

Establishment of a JIC is dependent upon the location of the discharge/release, and may
differ between responses. The JIC should be established in an area that is separate from
response operations, to the extent practicable. Utilization of a local Emergency Operations Center (EOC) may prove beneficial for response personnel during the initial stages of an incident, however, an alternative JIC should be considered for long-term incidents.

The United States Coast Guard has identified two Joint Information Centers for initial response:

**Mississippi – Alabama**
USCG Sector Mobile
1500 15th Street
Mobile, AL 36615-1390

**Northwest Florida**
Marine Safety Detachment Panama City
1700 Thomas Drive
Panama City, FL 32408-5804

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**2320 Family Relations**

Incidents have the potential of generating concern among family members in regards to the safety of employees, contractors, vessel/facility crew, passengers, stakeholders, and response personnel. In general, such inquiries should be directed to the public affairs representative of the organization where the family member is employed.

The American Red Cross can coordinate and manage family support services such as crisis and grief counseling, transportation, housing, meals, child care services, and cost accounting. The following phone numbers (separated by State) will connect families/responders to the appropriate American Red Cross point of contact:

- Alabama: 251-544-6110
- Mississippi: 228-896-4511
- Florida: 850-432-7601

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.

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 (LOFR) and/or public affairs representative to coordinate information activities with the PIO.

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 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 public affairs representative to coordinate information activities
with the PIO. The PIO may assign an Assistant Public Information Officer and/or other JIC staff members to coordinate family relation activities with the RP and the appropriate Agency Representatives.

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. The following references may also apply:

- Presidential Executive Memorandum, “Assistance to Families Affected by Aviation and Other Transportation Disasters” – 9 September 1996
- Public Law 104-264, “Aviation Disaster Family Assistance Act of 1996”

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.
- Providing translation services, as required.

The appropriate point of contact for the National Transportation Safety Board is the NTSB Operations Center: 202-314-6185

Once this Federal Response Plan for a major transportation disaster is activated, the Federal Emergency Management Agency (FEMA) has been tasked to provide FEMA personnel to assist in public information dissemination. This assistance includes the establishment and staffing of:

- External media support centers, such as the incident site.
- Family Support Operations Centers.
- Other areas that may attract media interest.

The appropriate point of contact for the Federal Emergency Management Agency is FEMA Region IV External Affairs: 770-220-5200 x2

2320.1 News Release

The PIO should prepare a news advisory that identifies the PIO or JIC as the official source of information about the incident as soon as possible. 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 fact sheet format, and should summarize the key facts of the incident. The time required to compile, write, and obtain Command
approval of a fact sheet is will be substantially faster than that needed to produce a narrative news release.

As time permits, a more detailed news release should be prepared that describes the incident, identifies the RP and response agencies, outlines containment and clean-up efforts, covers future plans, and provides additional details as needed. 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 release.

Each media advisory, fact sheet, and news release should be approved by the organization’s IC, OSC (if speaking for that agency specifically), or the UC. Command-approval is also required prior to posting any information on a website, or through social media. Approval authority may be delegated from the Command to the PIO.

These written products should be distributed to major media outlets, government agencies, and appropriate external organizations listed in Section 9230.4. Coordination will be required among Federal, State, and RP information specialists to minimize the duplication of effort throughout the response. Ideally, the IC/UC will speak with “one voice” and talking points should be provided to all personnel assigned to Command and General Staff roles, key players who may interact with the media, and the Coast Guard Sector Mobile Command Duty Officer.

Updated fact sheets or news releases should be prepared at regular intervals until the incident has concluded, or there is no media interest. Distributing these updates at 0500, 1000, 1500, and 2000 will ensure that timely information is provided to the media prior to scheduled deadlines. The PIO will coordinate the release of this information with all interested parties, and will update this schedule as needed. For a small incident, once-a-day updates prior to 1500, or twice-a-day updates prior to 0500 and 1500 may be sufficient.
NEWS ADVISORY #1

Name of Incident
Issued July 3, 1991 at 11p.m.

For more information, contact:
Public Information Officer Name
Joint Information Center
(XXX) xxx-xxxx

JOINT INFORMATION CENTER NOW OPEN

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

The JIC was established at Insert JIC Location Here located at Address/General Location in City, State.

The purpose of the JIC is to:

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, and joint news conferences.

A news conference has been scheduled for HH:MM at the Conference Location.

Parking for media vehicles is available at Parking Lot Location located North/South/East/West of the Facility or Landmark.

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 continuously staffed, 24 hours a day.

-end-

Additional Contacts:

Name and Rank, USCG: (XXX) xxx-xxxx
Name and Title, RP: (XXX) xxx-xxxx
Name and Title, ___: (XXX) xxx-xxxx
NEWS RELEASE #1

Name of Incident
Issued July 3, 1991 at 11 p.m.

For more information, contact:
Public Information Officer Name
Joint Information Center
(XXX) XXX-XXXX

UC LAUNCHES SPILL RESPONSE

CITY – The U.S. Coast Guard, State Environmental Response, and Responsible Party have established a Unified Command Post in response to a XX gallon oil/hazardous substance spill/release into the Geographic Location due to Causation of Incident.

At approximately HH:MM this morning/afternoon/evening, the Description of What Caused the Incident. Report on Injuries / No injuries have been reported.

The Coast Guard has / has not restricted vessel traffic on the Geographic Area.

The Coast Guard FOSC, SOSC, and RP are working together to ensure that clean-up efforts are underway. Agency/RP activated its Spill Management Team and mobilized clean-up personnel and clean-up equipment from ABC Responders and XYZ Incorporated.

The cause of the incident is under investigation.

-end-

Additional Contacts:

Name and Rank, USCG: (XXX) XXX-XXX
Name and Title, RP: (XXX) XXX-XXXX
Name and Title, __: (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 current response actions to mitigate the damage. OSC, RP, and community relations personnel should ensure that all appropriate public and private interests are informed and that their concerns are considered throughout a response.

During major 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 take action to obtain reliable information.

2330.1 City Government Offices

During an incident, determine the county(s) that could potentially be impacted by the spill. Once identified, contact that county’s Emergency Management Coordinator / Director to determine whether or not the spill could impact unincorporated areas under the county’s jurisdiction. Additionally, confirm whether or not 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 / Director to provide the name, title, phone, and fax number of each impacted cities Emergency Management Coordinator / Director, Environmental Health Supervisor, or other appropriate municipal contact.

The appropriate city and county officials should be added to the distribution list for all news releases about the spill, and should be invited to send a city/county public affairs official to the JIC to serve as an Assistant Public Information Officer (County/City).

2340 Protocol for Access / Timing of Media Briefings

The FOSC is the sole release authority for official statements concerning Federal clean-up actions. All official statements shall be approved by the FOSC. The goals of all public information efforts in pollution response are to:

- Inform the community of potential threats to people or the environment.
- Provide an up-to-date status of clean-up operations.
- Dispel rumors with facts.

The key to successful public affairs in pollution response is advanced 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. Release Procedures – Between AC / FOSC:
   a. Procedures must be established to ensure that all information released pertaining to the clean-up is approved by the FOSC regardless of the geographic location of the person releasing the information.

3. Guidelines for Responder-Media (On-Scene Reporters) Interactions
   a. Responders should understand that they may be perceived as official spokespersons.
   b. Individuals may explain to reporters what their specific job is.
   c. Media questions that do not pertain to an individual’s specific job assignment should be referred to the PIO.

4. Coordination with other agencies.

5. Request additional public affairs support as needed.

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

2340.1 Press Releases

It is the policy of the AC to issue a prompt and accurate press release regarding the nature of the incident, including initiated response efforts. The release also serves to establish the PIO as the response’s primary media contact. Future releases and announcements should be coordinated through the UC with appropriate approvals. All press releases should have contact numbers for all appropriate parties, date issued, time issued, and sequence numbers (i.e. Incident Name Release #1).

The initial press release should convey:

- If an Incident Command Post (ICP) has been established.
- Which agencies are involved in response?
- The location, time, and additional information about the incident (to include the type of pollution and proximity to the shoreline).
- Whether volunteers are being sought at this time.
- If volunteers are sought, who should they contact for more information?
- Phone numbers, website, and social media information for media inquiries.
2340.2 In-Person Press Releases

The PIO must decide what interview format (individual vs. group briefing) is most appropriate. PIOs will only report verified information during these briefings, and will not speculate on the cause or quantities (if unknown). 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:

- Focus in on key messages to be passed.
- Determine venue for media conference.
- Issue an advisory alerting media regarding the time/location of the conference.
- Notify the appropriate levels of management/spokespersons.
- Ensure that the meeting space has enough electrical outlets/accessibility.
- Validate parking arrangements.
- Identify location for individual interviews afterward.
- Prepare media kits, if required.
- Set up conference location – chairs, A/V equipment, etc.
- Procure a tape recorder to document the conference.
- Procure a “Unified Command” logo for a backdrop visual, if appropriate.
- If required, provide security (not in uniform).
- Check credentials of media attending.
- Brief media prior to main presenter(s) arrival.
- Establish time limitations with media prior to the arrival of the main presenter(s).
- Explain that for the sake of time, one question will be authorized initially until all other have had an opportunity to voice their concerns.
- Ensure the opening remarks of presenters are brief and focused.

2340.3 Telephone Press Conferences

PIOs will only report verified information during these briefings, and will not speculate on the cause or quantities (if unknown). 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:

- Arrange for moderated conference call.
  - Ensure ample number of participant lines (for media).
  - Ensure ample number of leader lines (for spokesperson(s) and PIO)
  - Distribute pass-code for all involved parties.
  - Determine if the call should be recorded for archive purposes.
  - Schedule pre-conference meeting one hour prior with spokesperson(s) to go over key messages and call format.
- Once the press conference starts, brief participants on the format and introduce spokesperson(s).
- Additional information is contained in Section 2340.2
2340.4 Town Meetings

The UC should give careful consideration as to whether a town meeting has value for a specific incident. The town meeting is designed to directly address the concerns of community members, and it is important to allow them to present these concerns. In many instances, the community is not as interested in the type of mechanical response actions, but on the results/effectiveness of said response actions. Town meetings allow for face-to-face communication between the LOFR and community members/leaders.

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 cover the event rather than participate in it. The interests/concerns of community members should remain as the focal point of the meeting.

If possible, reporters can be accommodated following the formal meeting through one-on-one interviews or other briefings. News packets should also be available for media representatives with up-to-date information and backgrounds 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.

2340.5 Media Logs

To ensure timely and accurate information is provided, a log should be maintained to track inquiries by reporters. Including basic information such as name, organization, time of call, and information sought will establish a standardized response practice for the public affairs staff. Media requests requiring follow-up action should be highlighted and assigned to the proper personnel to ensure that questions are answered in a timely manner. 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

Following an incident, response personnel can anticipate and prepare for standard questions pertaining to the response effort. These questions should be addressed during the initial statement prior to opening the floor to questions. Commonly asked questions are included below:

- How much oil has spilled, and has it been contained?
- What time did the incident occur?
- What was the cause, and is anyone at fault?
- What is the name/address of the Responsible Party?
- Who will assume responsibility for clean-up?
- Were there any injuries?
- Is there any threat to the environment?
- How would you classify the spill (small/medium/large)?
- How long will the clean-up take?
- How much will it cost?
- Will affected communities and individuals be compensated for losses?
• What response mechanisms will be used (in-situ burning / dispersants)?
• What is the trajectory of the oil?
• What wildlife or marine life is being threatened?

2340.7 External Organizations

These organizations are non-governmental agencies including, but not limited to, non-profit response agencies, 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 distributed to these external organizations to ensure that response personnel speak with one voice to avoid confusion or misinformation during an incident.

Refer to the Personnel and Services Directory for contact information for the following agencies:

• American Red Cross
• Alabama Department of Economic and Community Affairs
• Auburn Marine Extension
• Bon Secour National Wildlife Refuge
• Dauphin Island Sea Lab
• Weeks Bay National Estuarine Research Reserve
• Grand Bay National Estuarine Research Reserve
• Apalachicola National Estuarine Research Reserve
• Mobile Bay National Estuary Program

2340.8 News Media Outlets

During an oil spill or hazardous substances release, the individual notification of all media outlets could hinder the response effort and place an additional burden on the public affairs staff as they work to distribute timely and factual information. As a result, the AC has developed a News Media Contact List, located in Section 9200.

The News Media Contact 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 (i.e. toxic fume release or explosion due to an oil/chemical spill).

2. Radio, TV, and daily newspapers which both have a full-time news staff with on-scene news capabilities and reach large general population audiences in the Alabama, Mississippi, and 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.
4. Other media outlets, cable TV systems, and business publications not included in this Contact List may contact the Joint Information Center (JIC) to request that they be added to the broadcast distribution list for news releases about a specific incident.

News releases can be posted online by United States Coast Guard District Eight Public Affairs at the following link: http://uscgnews.com
News by Region: 8th District Heartland

2350 Homeland Security Information Network (HSIN)

United States Coast Guard 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, 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 (emergency management, law enforcement, critical sectors, intelligence, etc.)

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 offers many dynamic capabilities including, but not limited to:

- Conferencing
- Archiving of Documents
- Common Operational Picture (COP)
- Discussion Boards
- Task Lists
- Training Materials

In order to utilize HSIN, an application must be obtained via request through HSIN.Outreach@hq.dhs.gov

2400 Liaison Officer

Incidents that are multi-jurisdictional, or have several organizations involved, may require the establishment of the LOFR position. Only one LOFR will be assigned for each incident, including incidents operating under UC and multi-jurisdictional incidents. The LOFR is assigned to the incident to be primary coordinator for the liaison network, including Assisting and Cooperating Agency Representatives (AREPS).

Assisting Agency: An agency or organization providing personnel, services, or other resources to the agency with direct responsibility for incident management.

Cooperating Agency: An agency supplying assistance other than direct operational or support functions to the incident management effort.
Additional information pertaining to the roles and responsibilities of the Liaison Officer can be found at: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 2410 Investigators

Many, if not all, spills and releases are marine casualties of which the Coast Guard has jurisdiction (46 CFR Part 4), and the National Transportation Safety Board (NTSB) often investigates accidents resulting in large oil or hazardous substance discharges. Relationships between investigators will be governed by the Memorandum of Understanding between the USCG and the NTSB, as well as side-bar agreements between State and local investigators. The Federal On-Scene Coordinator will normally group the investigation as a separate entity from the Liaison Officer, and the USCG utilizes an Intelligence and Investigations Section within the General Staff.

The National Transportation Safety Board (NTSB) is an independent Federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation – railroad, highway, marine and pipeline.

In accordance with 49 U.S. Code §1131, the NTSB is authorized to investigate any major marine casualty as defined in 49 C.F.R. Part 850 and 46 C.F.R. Subpart 4.40 (except a casualty involving only public vessels) occurring on, or under, the navigable waters, inland waters or territorial sea of the United States, or involving a public vessel of the United States and any other vessel. The NTSB and the United States Coast Guard have entered into a Memorandum of Understanding to foster interagency communication, coordination, and to engender the development of marine safety investigation processes that will best serve the maritime community and the public at large.

The NTSB’s Office of Marine Safety (OMS) investigates major marine accidents as defined previously to determine the probable cause and identify safety recommendations which will prevent similar events in the future.

OMS may also investigate, independently or with another government, marine accidents in which the United States is a party of substantial interest, according to the International Maritime Organization’s “Code for the Investigation of Marine Casualties and Incidents”. When the NTSB’s OMS launches an accident investigation, the Investigator-in-Charge is supported by other NTSB divisions such as Research and Engineering, General Counsel, Media Relations, Government and Industry Affairs, and Transportation Disaster Assistance.

The NTSB’s Transportation Disaster Assistance (TDA) Division works closely with local, state, and federal agencies, non-governmental and private organizations, and vessel operators during an accident response to offer support services and address the needs, questions and concerns of survivors and family members of the fatalities. Such support services may include, but are not limited to transportation and logistics; emotional care; spiritual care; victim identification and forensics; personal effects management; and the coordination of services for foreign nationals. The TDA Division also serves as the primary resource for survivors, families, and friends regarding NTSB investigations.
TDA Specialists provide information regarding the NTSB investigative process, and to the maximum extent practicable, updates on the status of existing investigations. Federal legislation regarding family assistance operations applies to the NTSB’s TDA and certain air carriers and passenger rail carriers: 49 U.S. Code § 1136; 49 U.S. Code § 41113; 49 U.S. Code § 41313; 49 U.S. Code § 1139 and 49 U.S. Code § 24316.

Duty Officers for each office and division of the NTSB are available at all times. To report an accident or to contact a Duty Officer regarding an urgent matter, call the NTSB’s Response Operations Center at (202) 314-6290

For more information about the National Transportation Safety Board, please visit their website at www.ntsb.gov.

2420 Trustees

**Trustee:** An official of a Federal natural resources management agency designated in subpart G of the National Contingency Plan, or a designated State official, Indian tribe, or in the case of discharges covered by the Oil Pollution Act of 1990 (OPA90), a foreign government official who may pursue claims for damages under Section 107(f) of CERCLA or Section 1006 of OPA90.

Upon notifications 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 OPA90 are to take the following actions:

- In accordance with OPA90 Section 1006I, 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.
- As appropriate, and subject to the public participation requirements of OPA90 Section 1006I, develop and implement a plan for the restoration, rehabilitation, replacement, or acquisition of the equivalent of natural resources under their trusteeship.

When circumstances permit, the FOSC shall share the use of Federal response resource (including, but 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 facilities 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 National Pollution Funds Center (NPFC) for funding for initiation of damage assessment for injuries to natural resources.

**2420.1 Federal Trustees**

In the USCG Sector Mobile COTP Zone, the Federal trustees include the:

- Department of Commerce
- Department of Defense
- Department of the Interior

See Section 9200 for further information.

**2420.2 State Trustees**

State officials designated by the Governor to act as a trustee for natural resources within the State’s boundaries or for resources belonging to, controlled by, or appertaining to the State(s) of Florida, Alabama, and 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 the primary contact for the FOSC. This individual should have ready access to appropriate State officials with environmental protection, emergency response, and natural resource responsibility.

In the USCG Sector Mobile COTP Zone, the State trustees include:

- Alabama Department of Environmental Management (ADEM)
- Mississippi Department of Environmental Quality (MSDEQ)
- Florida Department of Environmental Protection (FDEP)
- Florida Wildlife Conservation Commission (FWCC)

Examples of resources under the State trusteeship include:

- State forest lands
- State-owned minerals
- State parks and monuments
- State rare, threatened, and endangered species
- 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 a trustee on behalf of the tribe. The Department of the Interior may also act as a trustee if requested to do so by the tribe.

Examples of resources under the Tribal trusteeship include:

- Ground and surface water resources on Tribal lands.
- Any other resources found on Tribal lands.
2421 Identification of Lead Administrative Trustee (LAT)

Lead Administrative Trustee (LAT): A natural resource trustee who is designated on an incident-by-incident basis for the purpose of pre-assessment and damage assessment, who is chosen by trustees whose natural resources were affected by an incident. The LAT facilitates effective and efficient communication during response operations between the FOSC and other natural resource trustees conducting activities associated with damage assessment. The LAT is also responsible for applying to the FOSC for access to response operation resources on behalf of all trustees for the initiation of a damage assessment.

The trustees shall assure (through the LAT) that the FOSC is informed of their actions 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 LAT) that all data from the natural resource damage assessment activities that may support effective operational decisions are provided in a timely manner to the FOSC.

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

2430 Natural Resource Damage Assessment (NRDA) Representative

The Natural Resource Damage Assessment (NRDA) Representatives are responsible for coordinating the NRDA needs and activities of the trustee team. NRDA activities generally do not occur within the structure, processes, and control of the Incident Command System (ICS); however, in the early stages of response many NRDA activities overlap with the environmental assessment performed for the sake of spill response. Therefore, NRDA Representatives should coordinate with the spill response organization through the LOFR. Additionally, the NRDA Representative may also need to work directly with the UC, Planning Section, Operations Section, and the NOAA SSC to resolve any problems or address areas of overlap.

While NRDA resource requirements (and costs) may fall outside the responsibility of the Logistics Section and the Finance/Administration Section, coordination between these entities is important.

The NRDA Representative will coordinate NRDA, or injury determination activities.

2430.1 NRDA Funding Through Responsible Party

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 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 direct contact 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.

2430.2 NRDA Funding Through the Oil Spill Liability Trust Fund (OSLTF)

The Federal Lead Administrative Trustee (LAT) must submit a request for initiation of a Natural Resource Damage Assessment (NRDA) to the National Pollution Funds Center (NPFC) to secure a funding obligation following an oil spill. The request must include the following:

- Amount requested
- Plan for fund use
- Estimated completion date
- Agreement for subrogation of all cost recovery actions
- Agreement to comply with National Pollution Funds Center documentation requirements.
- Certification of lead trustee status

Based on the request for initiation, an Interagency Agreement (IAG) will be executed for each Oil Pollution Act (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 IAP, 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 RP

The RP should be the primary funding source for the 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 direct contact 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 (AREP)

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

AREPs report directly to the LOFR, or the IC in the absence of the LOFR.

Assisting Agency: An agency or organization providing personnel, services, or other resources to the agency with direct responsibility for incident management.

Cooperating Agency: An agency supplying assistance other than direct operational or support functions to the incident management effort.

2450 Stakeholders

Stakeholder: A group, organization, or individual that has a vested interest in a specific area affected by a pollution incident. Many of these groups are government agencies responsible for the management and upkeep of a specific area, but are not designated trustees.

See Section 9250 for a listing of stakeholder contact information.

2450.1 Economic

Economic stakeholders have a vested interest in the response effort, especially if the incident directly effects operations. Various economic stakeholders possess equipment, personnel, and supplies needed throughout the response effort and should be informed of major accomplishments or challenges. Economic stakeholder contact information is provided in Section 9250.

2450.2 Political

Ensuring that the cognizant local, State, or Federal entity remains abreast to current operations ensures that the needs of response personnel can be briefed throughout the political enterprise. Political stakeholder contact information can be found in Section 9200.

2450.3 Volunteer Management

After a major pollution incident, especially one that receives extensive media coverage, members of the local communities have demonstrated their commitment by arriving at the sites of oil spills to volunteer for the clean-up effort. 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 set forth in the National Contingency Plan (NCP), 40 CFR 300.185. Generally, volunteers will not be used during Federally funded responses without the permission of the FOSC. A volunteer’s unknown background, the
potentially confusing chain of command, and liability issues often preclude the use of volunteers in most situations. Should the UC decide to use volunteers they should ensure that they obtain Coast Guard, or legal, counsel. State and local agencies may utilize volunteers in accordance with their own policies.

In 2011, a Memorandum of Understanding (MOU) was signed between the United States Coast Guard (USCG), Environmental Protection Agency (EPA), and the Corporation for National and Community Service (CNCS). This MOU established the resource support to the FOSC by the CNCS.

The CNCS is a Federal agency that helps millions of Americans improve the lives of others through service, and can outlines strategies for six focus areas:

- Disaster Services
- Economic Opportunity
- Education
- Environmental Stewardship
- Healthy Futures
- Veterans and Military Families

CNCS programs provide vital support (especially human capital) to the National, State, and local voluntary organizations and public agencies that lead response. 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 to support response and recovery efforts.

Non-Governmental Organizations (NGO): Collaborate with first responders, government, and other agencies assigned 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. Additionally, the National Voluntary Organizations Active in Disaster (NVOAD) is a consortium of more than 30 recognized National organizations of volunteers actively engaged in disaster relief.

Community-Based Organizations (CBO): 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 non-profit organizations,

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 accounting for harms caused by the voluntary service.
First, it bans government officers and employees from accepting voluntary services for the government, except for certain emergencies (with UC approval).

Second, it bans government officers and employees from employing personal services in excess of that authorized by law defined under 31 USC 1342.

The purpose of the statutory prohibition is to avoid situations that might generate future claims for compensation, which might be in excess of Federal agencies funds.

2450.3.1 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 LOFR.

Responsibilities of the Volunteer Coordinator include, but are not limited to:

- Coordinate with the LOFR to determine volunteer needs.
- Identify necessary skills and training needs.
- Verify minimum training requirements with the SOFR.
- Coordinate nearby, or on-site, training.
- Identify, and secure, equipment as needed.
- Recruit additional volunteers (by identified skill sets) through media appeals.
- Assist volunteers with other special needs.

2450.3.2 Response Assistance Assignments

Utilization of volunteers is subject to guidance set forth in the National Contingency Plan (NCP), 40 CFR 300.185, which requires the identification of functions for volunteer participation during response actions (should generally not be 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 (Resource Unit)
- Beach Recon / Wildlife Patrols (Planning Section)
- Demobilization Check-Out (Demobilization Unit)
- Public Affairs Administrative Support (Public Information Officer)
- Facility Support (Facility Unit)
- Wildlife Cleaning and Rehab (Operations Section)
  - Will be supervised and managed by the Department of the Interior, or its delegated representative.
- Others as specific incident characteristics allow.

When the UC is directing, using, or controlling volunteers the governmental liability for health and safety of these individuals 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 the FOSC’s actions, if conducted outside of their scope of authority.
2450.3.3 Volunteer Training

In accordance with the guidelines of the National Contingency Plan (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 29 CFR 1900.120 dictates the level of HAWOPER training required for response duties assigned. Volunteers involved in the post-emergency response phases of an oil spill will require hazardous substances 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.

Instead, volunteers can fall under a “De Minimis” exception. Under OSHA Directive CPL 2-2.51 and OSHA Standards Interpretation and Compliance Letters (February 13, 1992), “A minimum of four hours [training] would be appropriate in most situations.” Prior to deploying volunteers, ensure any training requirements have consensus review by the Safety Officer and Legal Officer.

Once training has been completed, individuals are to be given written certification and the Command shall archive a copy.
Overview

The Operations Section is responsible for directing the tactical actions to meet incident objectives. 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 Operations Section is responsible for all field activities directly applicable to the primary mission. The Section also directs the preparation of operational plans, requests or releases resources, and makes changes to the IAP as necessary. The Operations Section is compromised of the following:

**Staging Area:** Location established where resources can be placed while awaiting a tactical assignment. The Operation Section manages the Staging Area(s) through a Staging Area Manager (STAM).

**Branch:** The organizational level having functional or geographic responsibility for major parts of the Operations functions. The Branch level is organizationally between the Section and the Division/Group in the Operations Section. Branches are identified by the use of Roman numerals or by functional name (e.g., medical, security, etc.).

**Divisions:** Divisions are used to divide an incident into geographical areas of operation. A Division is located within the Incident Command System (ICS) organization between the Branch and the Task Force / Strike Team. Divisions are identified by alphabetic characters for horizontal applications and, often, by geographic area.

**Groups:** Groups are established to divide the incident into functional areas of operation. Groups are composed of resources assembled to perform a special function not necessarily within a single geographic division. Groups are located between Branches and the Task Force / Strike Team.

**Strike Team:** A specified combination of the same kind, and type, of resources with common communications and a Leader.

**Task Force:** A combination of single resources assembled for a particular tactical need with common communications and a Leader.

3110 Operations Section Chief

The Operations Section Chief (OSC), a member of the General Staff, is responsible for the management of tactical operations directly in support of the primary mission. The
OSC is normally selected from the organization with the most jurisdictional or functional responsibility for the incident.

The OSC activates and supervises Incident Command System (ICS) organization elements in accordance with the IAP, and directs IAP implementation. The OSC also directs the preparation of operational plans, requests or releases of resources, monitors operational progress, makes expedient changes to the IAP when necessary, and reports those changes to the IC or UC.

The OSC may have Deputy OSC(s), who may be from the same organization as the OSC or from an assisting organization. Deputy OSCs must have the same qualifications as the person for whom they work, as they must be ready to take over as OSC at any time. During a complex incident response the OSC may assign a Deputy to supervise on-scene operations while the OSC participates in the incident planning process.

The major responsibilities of the Operations Section Chief include:

- Supervise Operations Section field personnel.
- Evaluate on-scene operations and make adjustments to organization, strategies, tactics, and resources as necessary.
- Ensure the Resource Unit Leader (RESL) is advised of changes in the status of resources assigned to the Operations Section.
- Ensure that Operations personnel execute work assignments while following approved safety practices.
- Monitor the need for and request additional resources to support operations as necessary.

For more information pertaining to the Operations Section Chief, refer to the United States Coast Guard Incident Management Handbook (2014) or access the following site: https://homeport.uscg.mil/ics

3120 Operations Section Preliminary Objectives

The Operations Section Chief (OSC), a member of the General Staff, is responsible for the management of tactical operations directly in support of the primary mission. To ensure a comprehensive response effort, the IC or UC will present objectives to response personnel to be accomplished.

Refer to Section 2130: Incident Objectives for examples of standard pollution response Objectives.

3130 Scalability of the Operations Section

The Operations Section will naturally evolve based on the needs of the incident. Initially, the first responder will assume the role of Initial Incident Commander and will hold all Command & General Staff responsibilities. As the incident progresses this individual may delegate these roles to first response personnel until an Incident Management Team (IMT) or Spill Management Team (SMT) conducts a Transfer of Command. Once this
occurs the Incident Command System can expand or contract as needed on an incident-by-incident basis. The Operations Section Chief must ensure a proper span of control (3-7 subordinates per supervisor) is maintained throughout the Section. This can be accomplished through the utilization of Deputy Operations Section Chief(s), Branches, Divisions, Groups, Strike Teams, and Task Forces.

**3140 Operational Risk Management**

The safety of response personnel, particularly those assigned to the Operations Section shall ensure that Operational Risk Management (ORM) is utilized throughout the response.

All personnel assigned to an incident, especially Operations Section field personnel, shall refer to the following Sections within this Area Contingency Plan:

- **2230: Operational Risk Management (ORM)**
- **2230.1: Terms/Definitions**
- **2230.2: ORM Process**
- **2230.3: ORM Decision-Making Principles**
- **2230.4: Severity, Probability, Exposure (SPE) Risk Assessment Model**
- **2230.5: GAR Risk Assessment Model**
- **2230.6: ORM Implementation**

Failure to abide by the instruction laid forth in this Section will place response personnel at risk and could result in serious harm or injury to personnel.

**3200 Recovery and Protection Branch**

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

The following response priorities will follow PEPE:

- Protect *People* (human life and health)
- Protect *Environment* (minimize ecological impacts)
- Protect *Property* (minimize public impacts)
- Protect *Economy* (minimize economic impacts)

Due to the large amount of environmentally sensitive wetlands and the abundance of endangered (and threatened) fauna/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 booms across the mouths of creeks that lead back into marshy areas, tidal flats, and mangrove swamps. This strategy, if employed correctly, will maximize the protection of environmentally sensitive areas with a minimum amount of boom.
The probability of success for boom protection strategies is dependent upon winds and current. Currents in excess of 2.5 knots are common in the inland waters and Intracoastal Waterway during the tidal change, 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. This may be a viable option for smaller spills. Ideally, the density of the marsh grasses will hinder the spread of oil.

Numerous environmentally sensitive areas place a high priority on the rapid collection of oil. Several collection points have been identified in the Sector Mobile area. The majority of locations are suitable for vacuum truck (abundant) or skimmer units (few).

The Environmental Sensitivity Index lists 10 types of shorelines. Shoreline clean-up will be conducted in accordance with the shoreline sensitivity classification as outlined in the following sections.

For response purposes this plan has established three categories:

- **High Sensitivity (Class A)**
  - Coral Reefs
  - Vegetated River Banks
  - Salt Marsh and Mangrove Swamp
  - Sea Grass Beds
  - Freshwater Marshes and Swamps
  - Shellfish Harvesting Areas

- **Moderate Sensitivity (Class B)**
  - Fine Sand Beaches
  - Course/Mixed Sand Beaches
  - Tidal Flats

- **Low Sensitivity (Class C)**
  - Sea Walls and Piers
  - Rocky Platforms

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 provide a more effective, and detailed delineation.

**3201 NOAA Shoreline Countermeasures Manual**

The following strategies and matrices are drawn from the National Oceanic and Atmospheric Administration (NOAA) Shoreline Countermeasures Manual for Tropical Coastal Environments (1993). Per the manual, Environmentally Sensitive indexes are broken down into 10 types of shorelines and utilize a Shoreline Countermeasure Matrix to indicate Recommended, Conditional, and Not Recommended shoreline countermeasures for oil spill response for 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 in this matrix. The FOSC has the responsibility and authority to determine what countermeasures are appropriate for the various situations encountered. The Shoreline Countermeasure Matrices are provided in the following sections.
## 3201.1 Shoreline Countermeasure Matrix (Very Light Oils)

### SHORELINE TYPE CODES

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<thead>
<tr>
<th>Shoreline Type</th>
<th>Code</th>
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<tbody>
<tr>
<td>Exposed rocky shores and vertical, hard man-made structures</td>
<td>1</td>
</tr>
<tr>
<td>Exposed wave-cut rock platforms and reef flats</td>
<td>2</td>
</tr>
<tr>
<td>Fine grained sand beaches</td>
<td>3</td>
</tr>
<tr>
<td>Medium to coarse-grained sand beaches</td>
<td>4</td>
</tr>
<tr>
<td>Mixed sand and gravel beaches</td>
<td>5A</td>
</tr>
<tr>
<td>Artificial fill having a range of grain size &amp; materials</td>
<td>5B</td>
</tr>
<tr>
<td>Gravel beaches</td>
<td>6A</td>
</tr>
<tr>
<td>Exposed riprap</td>
<td>6B</td>
</tr>
<tr>
<td>Exposed tidal flats</td>
<td>7</td>
</tr>
<tr>
<td>Sheltered rocky shores and coastal structures</td>
<td>8</td>
</tr>
<tr>
<td>Sheltered tidal flats</td>
<td>9</td>
</tr>
<tr>
<td>Mangroves</td>
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### SHORELINE TYPES

<table>
<thead>
<tr>
<th>Countermeasure</th>
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<th>4</th>
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<th>5B</th>
<th>6A</th>
<th>6B</th>
<th>7</th>
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<th>10</th>
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<td>3) Debris Removal</td>
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<td>4) Trenching</td>
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<td>5) Sediment Removal</td>
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<td>6) Ambient Water Flooding (Deluge)</td>
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<td>R</td>
<td>C/R</td>
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<tr>
<td>7) Ambient Water Washing</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<td>a) Low Pressure (&lt;50 psi)</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>b) High Pressure (&lt;100 psi)</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<td>8) Warm Water Washing Mod-High Pressure</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>9) Hot Water/High Pressure Washing</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>10) Slurry Sand Blasting</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>11) Vacuum</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
<td></td>
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<tr>
<td>12) Sediment Reworking</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>13) Excavation, Cleansing, and Replacement</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
<td></td>
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<tr>
<td>14) Cutting Vegetation</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>15) Chemical Treatment</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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</tr>
<tr>
<td>a) Oil Stabilization with Elastomizers</td>
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<td>R</td>
<td>C/R</td>
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<tr>
<td>b) Protection of Beaches</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>c) Cleaning of Beaches</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>16) In situ Burning of Shorelines</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<tr>
<td>17) Nutrient Enhancement</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<td>18) Microbial Addition</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
<td></td>
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<tr>
<td>19) - Requires RRT approval</td>
<td>R</td>
<td>R</td>
<td>C/R</td>
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<td></td>
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</tr>
</tbody>
</table>

* - Requires RRT approval
R – Recommended
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 observers 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 On-Scene Coordinator (SOSC) 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 clean-up countermeasures.
3201.2 Shoreline Countermeasures Matrix (Light Oils)

### SHORELINE TYPE CODES

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Exposed rocky shores and vertical, hard man-made structures</td>
</tr>
<tr>
<td>2</td>
<td>Exposed wave-cut rock platforms and reef flats</td>
</tr>
<tr>
<td>3</td>
<td>Medium to coarse-grained sand beaches</td>
</tr>
<tr>
<td>4</td>
<td>Fine grained sand beaches</td>
</tr>
<tr>
<td>5A</td>
<td>Mixed sand and gravel beaches</td>
</tr>
<tr>
<td>5B</td>
<td>Artificial fill having a range of grain size &amp; materials</td>
</tr>
<tr>
<td>6A</td>
<td>Gravel beaches</td>
</tr>
<tr>
<td>6B</td>
<td>Exposed riprap</td>
</tr>
<tr>
<td>7</td>
<td>Exposed tidal flats</td>
</tr>
<tr>
<td>8</td>
<td>Sheltered rocky shores and coastal structures</td>
</tr>
<tr>
<td>9</td>
<td>Sheltered tidal flats</td>
</tr>
<tr>
<td>10</td>
<td>Mangroves</td>
</tr>
</tbody>
</table>

### Countermeasure

<table>
<thead>
<tr>
<th>Countermeasure</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5A</th>
<th>5B</th>
<th>6A</th>
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</thead>
<tbody>
<tr>
<td>1) No Action</td>
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* - Requires RRT approval

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### 3201.3 Shoreline Countermeasures Matrix (Medium Oils)

#### SHORELINE TYPE CODES

<table>
<thead>
<tr>
<th>SHORELINE TYPE CODES</th>
<th>1 – Exposed rocky shores and vertical, hard man-made structures</th>
<th>2 – Exposed wave-cut rock platforms and reef flats</th>
<th>3 – Fine grained sand beaches</th>
<th>4 – Medium to coarse-grained sand beaches</th>
<th>5A – Mixed sand and gravel beaches</th>
<th>5B – Artificial fill having a range of grain size &amp; materials</th>
<th>6A – Gravel beaches</th>
<th>6B – Exposed riprap</th>
<th>7 – Exposed tidal flats</th>
<th>8 – Sheltered rocky shores and coastal structures</th>
<th>9 – Sheltered tidal flats</th>
<th>10 – Mangroves</th>
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* - Requires RRT approval  
R – Recommended  
C – Conditional  
NR – Not Recommended

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## 3201.4 Shoreline Countermeasures Matrix (Heavy Oils)

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<th>SHORELINE TYPES</th>
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<tr>
<td>3 – Fine grained sand beaches</td>
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<td>4 – Medium to coarse-grained sand beaches</td>
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<tr>
<td>5A – Mixed sand and gravel beaches</td>
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<tr>
<td>5B – Artificial fill having a range of grain size &amp; materials</td>
<td>6. Sediment Removal</td>
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<tr>
<td>6A – Gravel beaches</td>
<td>7. Ambient Water Flooding (Deluge)</td>
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<td>6B – Exposed riprap</td>
<td>8. Ambient Water Washing</td>
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<td>7 – Exposed tidal flats</td>
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</tr>
<tr>
<td>8 – Sheltered rocky shores and coastal structures</td>
<td>b) High Pressure (&lt;100 psi)</td>
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<td>9. Warm Water Washing/Mod-High Pressure</td>
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<td>10 – Mangroves</td>
<td>10. Hot Water/High Pressure Washing</td>
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**Countermeasure**

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<td>14) Excavation, Cleansing, and Replacement</td>
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<td>17) In situ Burning of Shorelines</td>
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* - Requires RRT approval

R – Recommended

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 observers 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 On-Scene Coordinator (SOSC) 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 clean-up countermeasures.
3205 Containment and Protection Options

Responders shall refer to basic booming strategies for information concerning specific locations for containment and protection, including but not limited to:

- Diversion
- Containment
- Exclusion
- Cascading
- Chevron

3210 Class A Ecosystem / Shoreline Types – High Priority

Class A Ecosystem / Shorelines include:

- Rare species and their critical habitats (some seasonal)
- Breeding, nesting, spawning areas (some seasonal)
- Shallow Coral Reefs (<3 meters deep)
- Salt Marsh and Mangrove Swamp
- Freshwater Marsh and Swamp
- Inlets, tidal creeks, passes (which would convey oil to high priority habitats/areas)
- Vegetated River Banks
- Shallow Sea Grass Beds (<1 meter deep)
- Shellfish Harvesting Areas
- Shallow Hard “Live” Bottom (<1 meter deep)
- 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. Compromising over 6,000 known species, corals (anthozoans) include sea fans, sea pansies, and anemones. Most corals contain symbiotic algae called zooxanthellae, within their gastro dermal 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 nitrates 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 a building block in the manufacturing of proteins, fats, carbohydrates, and calcium carbonate (CaCO₃).

Due to the sensitivity of this marine environment, marine-based pollution can significantly deteriorate the coral reefs. With such a fragile ecosystem, this habitat type is of high priority during an incident.
In 2000, Congress enacted the Coral Reef Conservation Act (CRCA) for the protection and management of coral reefs which included appropriations and authorities to the National Oceanic and Atmospheric Administration (NOAA) and established the U.S. Coral Reef Task Force. Any suspected, or potential, damage to corals requires immediate notification to NOAA for impact assessment and consultation.

Predicted Oil Impacts to a Coral Reef:

- Heightened exposure in shallow waters (due to typical oil density in this area).
- Little to no damage if oil remains at the surface.
- If spill occurs during coral spawning time numerous complications come into play.
  - Eggs and sperm are released at very precise times, and remain at shallow depths before settling.
  - Oil pollution can disrupt the long-term viability and reproductive success of corals.
- Excessive silting in shallow water may occur due to heavy response boat traffic, potentially suffocating polyps.
- Excessive damage can occur from multiple booming anchors in vicinity of coral colonies.

Recommended Actions for Spill Response:

- A coating of oil will kill the affected area; however, physically cleaning the area will induce additional damage due to the fragile nature of the species.
- Protective and diversion booming may be the best option to prevent potential oiling.
- Consult with the NOAA Scientific Support Coordinator (SSC) and/or the Environmental Unit for 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 archeological sites. Due to the large number, and diversity of, native plant/animal species, archaeological sites, difficulties in cleaning this area, and the possibility of freshwater contamination this habitat was given a Class A priority.

Predicted Oil Impacts:

- Small quantities of oil will cover the 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 will be affected by boat wakes and tides.

Recommended Actions for Spill Response:
• Consult with an archaeologist prior to cleaning.
• 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 biological stress to mangroves contamination of the food chain.

Recommended Actions for Spill Response:
• Generally, cleaning is not recommended as it may cause additional damage to the marsh. Consult with the National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) and/or the Environmental Unit in regards to 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 the 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 sub-lethal) on invertebrates and fish inhabiting grass beds. The greatest toxic threat effects occur in shallow (<1 meter) 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.
- Recovery time is at a minimum 1-2 years, but will most likely be more.

**Recommended Actions for Spill Response:**
- Prevent oil from entering the grass beds.
- Exercise extreme care to not disturb sediments during clean-up activities.
- Clean-up efforts onshore 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 the actual oiling.
- **Oiled Intertidal or Exposed Grass Beds**
  - Do no clean oiled grass blades, the 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 manually or by vacuum.
  - Minimize disturbance and removal of sediment, and below ground sea grass.
- Consult with the National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) and/or the Environmental Unit regarding the incidental removal of above ground grass during clean-up.

### 3210.5 Freshwater Marshes and Swamps

Freshwater marshes occur in the floodplains of the major rivers and associated tributaries in U.S. Coast Guard Sector Mobile’s Area of Responsibility. Marshes are characterized by emergent herbaceous plants, fluctuating water levels, and recurring fires. Typical plant species include pickerelweed, maiden cane, 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. 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. 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.

Recommended Actions for Spill Response:

- 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 is 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 are predicted if oiling occurs in shellfish harvesting areas.

Recommended Actions for Spill Response:

- Do not use clean-up methods that stir up bottom sediments, or mechanically damage oyster reefs.
- Consult with the National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) and/or the Environmental Unit regarding natural cleaning, low/medium volume flushing, or low pressure cold wash.

### 3213 Class B Shoreline Types – Moderate Priority

Class B Ecosystem / Shorelines include:

- Coral Reefs, deeper (>3 meters)
- Sea Grass, deeper (>1 meter)
- Hard “Live” Bottom, deeper (>1 meter)
- 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.
- Shallow penetration of oil into sediment.
- Danger of oiling seabirds or other organisms in the intertidal zone.

**Recommended Actions for Spill Response:**
- Care should be taken to prevent mechanical mixing of oil deeper into sediments.
- Minimize the amount of sand removed from the beach.
- Caution should be exercised in dune areas, particularly where concentrations of the endangered beach mouse exit.

### 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.

**Recommended Actions for Spill Response:**
- On coarse or mixed grain beaches, minimize sand removal.
- Manual clean-up is most effective.
Avoid excessive removal of sediment from fill, use manual clean-up 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, water-ward 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.

**Recommended Actions for Spill Response:**
- Deployment of sorbents from shallow-draft boats.
- Careful removal of oiled wrack.
- Mechanical damage from walking on flats can be severe.

### 3214 Class C Shoreline Types – Low Priority

Class C Ecosystem / Shorelines include:
- Seawalls, Industrial Facilities, and Piers
- Rocky Platforms
- Man-made Canal Systems (w/o rip rap shoreline)
- Sand Beaches (not included in above habitats)
- Storm Water Drains
- Developed and Agricultural Lands

#### 2314.1 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.

Recommended Actions for Spill Response:

- High-pressure washing to prevent chronic leaching.

3214.2 Rocky Platforms

This shoreline type is rare in the U.S. Coast Guard Sector Mobile Area of Responsibility, 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 the toxic effects of oil; however, thermal absorbance capacity or rock surface may be increased.

Recommended Actions for Spill Response:

- Removal of oiled wrack.
- High-pressure spray may be effective where plants and animals are not attached.
- Natural cleaning in high-energy areas.

3215 Hazardous substances Release Classification

The classification of hazardous substance releases per 40 CFR 300.5 is as follows:

**Minor release** means a release of a quantity of hazardous substance(s), pollutant(s), or contaminant(s) that poses minimal threat to public health or welfare of the United States or the environment.

**Medium release** means a release not meeting the criteria for classification as a minor or major release.
**Major release** means a release of any quantity of hazardous substance(s), pollutant(s), or contaminant(s) that poses a substantial threat to public health or welfare of the United States or the environment or results in significant public concern.

### 3220 Protection Group

The Protection Group is responsible for the deployment of containment, diversion, and absorbing boom in designated locations (this also includes fire boom).

Responsibilities include, but are not limited to:

- Deployment and maintenance of booms, dikes, or other protection devices as directed to accomplish protection, diversion, or containment strategies.
- Provide estimates of protection completion times.
- Report on effectiveness of booming to the Operations Section Chief (OSC).
- 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.

### 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 sea conditions, water currents, and wind. See ExxonMobil – Oil spill response field manual (2014) for guidance.

The following terms and strategies are commonly used on spill response, particularly for tactically assigned personnel:

**Boom:** 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). 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 wave/wind action can cause the boom to twist.
- **Round/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/Inflatable Booms** – Easy to clean and store, and they perform well in rough seas. However, they tend to be expensive, more complicated to use, and puncture/deflate easily.
• Fire Resistant Boom – 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, and the higher the waves swell the less effective booms become. While most booms perform well in gentle seas with smooth and 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.

The four principles of mechanical protection are:

**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.

**Collection**: Consists of gathering oil in area with boom to assist with the removal process of the oil.

Additional booming strategies include, but are not limited to:

**Containment Boom**: 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 bottom.
- 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 the boom upright.

**Teardrop or Donut**: Is 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. Minimum length of boom should equal 2 times the length of vessel plus beam.
- 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’) are often required for ship containment.
- Boat/manpower-intensive and requires highly skilled personnel. Access and 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 of the On-Water Recovery Group 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 surface residual 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 surface residual 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.
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. The National Oceanic and Atmospheric Administration (NOAA) Office of Response and Restoration website is an excellent starting point for understanding 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.

3240 Shoreside Recovery Group

The Shoreline Recovery Group is responsible for managing shoreline clean-up operations in accordance with the IAP. Responsibilities include:

- Manage the personnel/equipment as necessary to accomplish shore side recovery and clean-up objectives established in the IAP.
- Report on the efficiency of shore side recovery and clean-up methods.
- Identify resource and logistics support needs.
- Project clean-up completion dates.

3240.1 Shoreline Clean-up Options

Based on the type of impact or anticipated impact, several approaches may be used, including:

- **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 a larger area of contamination.

3240.2 Pre-Beach Clean-up

Pre-beach clean-up 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.

**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 clean-up has occurred. The Resource, Conservation, and Recovery Act (RCRA) and its implementing regulations contained in 40 CFR are quite specific in defining what hazardous waste is 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.

**3250.1 Waste Management and Temporary Storage Options**

Several factors must be taken into account when oily debris/waste begins 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 containers are leak free, the plastic liners are secure, and that materials are removed promptly on a regular basis.

**3250.2 Decanting Policy**

The UC 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 non-hazardous and prepare required Resource Conservation and Releases Recovery Act of 1976 (RCRA) manifests as required.
- Confirm the capacities of recycling or disposal sites.

### 3250.4 Disposal Procedure

- Federal, State, and local laws/regulations
- Volume of oil or hazardous substance for disposal
- Identify disposal locations (on-site vs. off-site)
- 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 clean-up, 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.

### 3255 Florida Statutes

The 1990 Florida Legislature enacted major changes to the State’s oil spill response and clean-up laws. Among the changes was the following directive to the Florida Department
of Environmental Protection (FDEP) concerning the disposal of oil spill clean-up generated debris.

Chapter 376.304 (2) Florida Statutes states:

The 1990 Florida Legislature enacted major changes to the State’s oil spill response and clean-up laws. Among the changes was the following directive to the Florida Department of Environmental Protection (FDEP) concerning the disposal of oil spill clean-up 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 clean-up 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 clean-up of pollutants in the waters of the state shall constitute final agency action subject to review pursuant to chapter 120, Florida Statutes.

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 clean-up 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.

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 FOSC during the spill clean-up 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 clean-up and disposal effort.
- The State Emergency Response Section will designate a lead disposal contact for the FOSC and RP representative.
- A list of privately owned landfills will also be provided to the FOSC and the RP.
- 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 pre-determining the types and volumes of waste acceptable at these facilities.

**General Disposal Guidelines:**

- Liquid waste petroleum products
  - Recycle or reuse.
- Liquid waste petroleum product & water mixture
  - Oil and water separator
  - Follow on with oil to recycler or re-refiner / water to Publically-Owned Treatment Works (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.
- Oil contaminated sand, (not saturated)
  - Designated landfill to be used as cover material.

Disposal options are described by the Guidelines for Assessment and Remediation of Petroleum Contaminated Soil.

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**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.

Basic decontamination guidelines:

- Establish and clearly identify the Decontamination Corridor.
  - Ideally, this location will be uphill from the hot zone, and upwind so airborne contaminants blow back toward the hot zone. If winds change, the decontamination station may have to be relocated.
- The Decontamination Zone should be accessible to emergency medical units.
- The Decontamination Corridor should be clearly marked with barrier tape, delineator posts, and traffic cones.
- Establish and clearly identify the point of entry from the Exclusion Zone into the Contamination Reduction Zone, as well as the exit corridor into the Support Zone.
- Weather conditions will be a significant factor during decontamination operations. Suitable shelter (tents) should be utilized for inclement weather conditions.
- Water used during decontamination procedures must be carefully controlled and kept to a minimum.

Water generated from decontamination procedures will always be treated as hazardous waste.

3270 Dispersants

Refer to Section 1670.1: Dispersant Use for guidance. The use of sinking agents is expressly prohibited by the National Contingency Plan (NCP).

3270.1 SMART Monitoring

When dispersants are used during spill response, the UC needs to know whether the operation is effective in dispersing the oil. The dispersant monitoring module of the National Oceanic and Atmospheric Administration (NOAA) Special Monitoring of Applied Response Technologies (SMART) Protocol is designed to provide the UC 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 (tiers) of monitoring:

- **Tier I**: Employs the simplest operation, visual monitoring, which may be coupled with Infra-Red Thermal Imaging or other remote detection methods.
- **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.
- **Tier III**: Expands on-water monitoring to meet the information needs of the UC. It may include monitoring at multiple depths, the use of a portable water
laboratory, or additional water sampling. This may also include the re-deployment 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. 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.

Additional information pertaining to the SMART Protocol can be found at: [http://response.restoration.noaa.gov/smart](http://response.restoration.noaa.gov/smart)

### 3280 In-Situ Burning (ISB)

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. SMART Protocols shall be implemented along with NOAA SSC consultation.

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 0.1 inches (2mm) 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 0.1 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 well above these limits.
- **In-situ burning reduces the slick thickness about 0.1 inches (2mm) per minute,** or about 0.07 gallons 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 Regional Response Team (RRT IV) in accordance with this agreement and, in addition, where applicable, in accordance with protocols established in Letters of Agreement (LOA) between the United States Coast Guard, Environmental Protection Agency, Department of the
Interior, Department of Commerce, and the affected State(s). The authority to authorize the use of in-situ burning provided under this Agreement to the FOSC may not be delegated.

The following three zones have been established to specify pre-authorized locations and conditions under which burning may occur:

“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 FOSC, and that no further approval, concurrence or consultation on the part of the USCG or the USCG FOSC 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.

“B” Zones: Waters Requiring Case-by-Case Approval

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:

- Anywhere within State waters.
- Waters less than 30 feet in depth that contain living reefs.
- Waters designated as a marine reserve, National Marine Sanctuary, National/State Wildlife Refuge, unit of the National Park Service, proposed/designated Critical Habitats.
- Mangrove areas or coastal wetlands (including 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:

- If the On-Scene Coordinator (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 form, found through RRT IV.
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.

The OSC is only granted authority to conduct in-situ burning in the “B” Zone when consent has been given by the EPA and the affected State(s), and after consultation with the DOI and DOC.

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 United States Coast Guard 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.

“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.
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 Form of the In-Situ Burn Plan shall be completed and provided to Regional Response Team (RRT IV) members in a timely manner for all burns. The following requirements apply to the use of all burning operations under the provisions of this policy:

1. Health and Safety Concerns
   a. Operators – Assuring workers’ health and safety is the responsibility of employers and the USCG FOSC who must comply with all Occupational Health and Safety Administration (OSHA) regulations. Prior to any in-situ burn operations, a Site Safety Plan must be submit to, and approved by the OSC.
   b. 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, the operations will immediately cease.

i. The Level of Concern (LOC) for particulates for the general public in the RRT IV is 150 ug/m$^3$ (PM-10) averaged over 1 hour.

2. Assignment of monitors representing the USCG, EPA, Federal trustee agencies, affected State(s), OSHA, and the RP 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 RRT IV.

   a. Unless smoke plumes are predicted to cross over populated or environmentally sensitive areas, an inability to conduct monitoring operations will not automatically be 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 On-Scene Coordinator will apply the decision tree contained in Appendix VI of the In-Situ Burn Plan held by RRT IV.

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 OCS 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 United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (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 UC in decisions related to initiating, continuing, or terminating in-situ burning.

Additional information pertaining to the SMART Protocol can be found at: [http://response.restoration.noaa.gov/smart](http://response.restoration.noaa.gov/smart)

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 Regional Response Team (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 RRT IV, using EPA’s Interim Guidelines for Preparing Bioremediation Spill Response Plans.

### 3300 Emergency Response Branch

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.

### 3310 Search and Rescue (SAR) Group

Search and Rescue (SAR) efforts primarily focus on 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)
- Firefighting Security
- Shoreline Search and Rescue Investigations
- On-Water Search and Recovery Resources
- Coordination of Resources
3320 Salvage Group

The Salvage Group is responsible for coordinating and directing salvage activities and source control related to the incident.

<table>
<thead>
<tr>
<th>Vessel Name</th>
<th>Official Number</th>
<th>Vessel Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flag</td>
<td>Owner / Operator</td>
<td>Phone Number</td>
</tr>
<tr>
<td>Builder</td>
<td>Class Society</td>
<td>Year Built</td>
</tr>
</tbody>
</table>

**Salvage Survey Checklist**

**Description of Casualty**

- Date / Time of Casualty
- Extent of Damage
- Hazardous Cargo Spill: Yes / No
- Structural Details
  - # Tanks / Holds
  - Drafts (Strandings) Before
    - Fwd: 
    - Aft: 
  - Drafts (Strandings) After
    - Fwd: 
    - Aft: 
- Tides at Time of Casualty
- Type of Bottom (mud, sand)
- Condition of vessel’s propulsion
- Aim/Intent of Salvage Operation

If vessel is a foreign flag, then USCG will need plans such as Lines Plan, General Arrangement, Tank Tables, T&S Booklet, etc. for detailed calculations.

3330 Marine Firefighting 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.

A marine fire can bring to the scene fire departments, law enforcement, public health, technical cargo experts, industrial fire departments, and private fire fighting and salvage experts.

3340 Hazardous Substances Group

The Hazardous Substances Group is responsible for coordinating and directing all hazardous material activities related to the incident. If the Hazardous Substances Group is activated, a Safety Officer must be activated on the incident.
3350 Medical Group

The Medical Group is responsible for coordinating and directing all emergency medical services related to the incident. This Group is not to be mistaken with the Medical Unit in Logistics that is responsible for medical services related to Incident Management Team personnel.

3360 Law Enforcement Group

The Law Enforcement Group is responsible for coordinating with Federal, State, and local law enforcement activities related to the incident. Responsibilities may include the establishment of a perimeter, crowd control, traffic control, etc.

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. The United States Coast Guard will initially deploy air assets from Aviation Training Center Mobile, Air Station New Orleans, or Air Station Clearwater. On long term incidents, additional air support may be provided from outlying Air Stations.

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

Aerial Surveillance will be conducted under the supervision of the Air Tactical Group (either as a Single Resource, Strike Team, or Task Force). Common responsibilities include, but are not limited to:

- 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 logistical needs.

**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 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 UC 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

Aerial Applications will be conducted under the supervision of the Air Tactical Group (either as a Single Resource, Strike Team, or Task Force). Common responsibilities include, but are not limited to:

- Conducting air operations missions to apply dispersants, chemical countermeasures, bioremediation, or other alternative response technologies as directed by the Operations Section Chief (OSC).
- Identify additional resources and logistical 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.

Notice to Airmen (NOTAM) or similar advisories can be posted (or broadcasted) by the FAA to alert aviators of possible environmental hazards. Likewise, response personnel and the media engaged in assessment or follow-up surveillance of a spill site need to be fully aware of FAA or Department of Defense (DOD) controlled airspace, including 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/coordinating organized relief air operations
  - Office of Emergency Planning
Law enforcement agencies
- U.S. Forest Service
- State aeronautical agencies
- State Governor
- FAA Flight Standards District Office
- Aviation event organizers
- Sporting event officials.

**Different Types of TFRs**
- Section 91.137: TFR in the Vicinity of Disaster/Hazard Areas
- Section 91.139: Emergency Air Traffic Rules
- Section 91.141: Flight Limitation in Proximity of the Presidential & Other Parties
- Section 91.143: Flight Limitation in Proximity of Space Flight Operations
- Section 91.145: Management of Aircraft Operations in Vicinity of Aerial Demonstrations and Major Sporting Events
- Section 99.7: Special Security Instructions

**Who Can Issue a TFR?**
FAA Headquarters, the Directors of Terminal, En Route and Oceanic Area Operations (or their designee) having jurisdiction over the area concerned may issue a TFR. The Air Operations Branch is responsible for facilitating the issuance of a TFR.

Additional information pertaining to Temporary Flight Restrictions can be found at: [http://www.faa.gov](http://www.faa.gov)

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### 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.

The Air Support Group’s Helibase or Helispot managers control helicopters during landing, takeoff, and while grounded. The Air Support Group Supervisor reports to the Air Operations Branch Director.

**3420.1 Air Traffic Coordination**

Air Traffic Coordination will be conducted under the supervision of the Air Support Group (either as a Single Resource, Strike Team, or Task Force). Common responsibilities include, but are not limited to:

- Direct and coordinate air operations as required by the IAP.
- Prioritize and assign air operations missions.
- Request additional aircraft resources and release aircraft when authorized.
- Coordinate ground services and aircraft support.
- Identify additional resources and logistical 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.

**Key Considerations for Response Personnel:**

- Staging Areas are locations where equipment and personnel are kept while awaiting a 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 Resource Unit Leader to determine if they are in excess to what is needed and should be demobilized.
- Staging Areas are designated by the name that describes their general location.

### 3510 Pre-Identified Staging Areas

During the onset of an incident, responders may require support from local (or county) Emergency Operations Centers to identify pre-identified Staging Areas. These locations may change based upon the needs of the Incident Management Team (IMT), however, pre-identified Staging Areas can be found within the Digital Area Contingency Plan.

To access the Digital Area Contingency Plan, refer to the following link: [http://ocean.floridamarine.org/acp/mobcap/](http://ocean.floridamarine.org/acp/mobcap/)

### 3520 Security

All Staging Areas should include perimeter security to prohibit unauthorized entry and safety to the workers. The Staging Area Manager will have oversight on all personnel assigned to the Staging Area and will hold the overall responsibility of securing the space. 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/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 UC. The State and Federal On-Scene Coordinator, 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. Additionally, responders should refer to any/all applicable Environmental Sensitivity Indexes and Geographic Response Plan(s) for the impacted region.

The general public is normally sensitive to reports and pictures of oiled wildlife, and response personnel should expect volunteers. If volunteers present themselves, engage the Liaison Officer or Planning Section Chief (dependent upon ownership of the Volunteer Coordinator position) as soon as possible if any reports of impacted wildlife are received.

3610 Fish and Wildlife Protection Options

In addition to the initially impacted wildlife population, continued exposure should be considered in the planning process to mitigate the potential for impacts on migratory species re-entering the affected areas during the clean-up activities.

Several options to mitigate these risks exist for the FOSC including hazing, capture, and re-release. Any such measures should be evaluated through the Environmental Unit in the Planning Section as well as the NOAA SSC.

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 of the Wildlife Recovery Group 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.

The Wildlife Recovery Group Supervisor reports directly to the Wildlife Branch Director.
3620.1 Carcass Retrieval and Processing

The U.S. Fish and Wildlife Service are responsible for the disposition of all migratory birds, dead or alive.

3630 Wildlife Rehabilitation Group

The Wildlife Rehabilitation Group is responsible for leading the recovery effort in regards to oiled wildlife.

Responsibilities of the Wildlife Rehabilitation Group include:

- Establish wildlife rehabilitation centers and conduct rehabilitation operations.
- Maintain documentation pertaining to wildlife delivered for rehabilitation.
- Store, document, coordinate laboratory analysis/necropsies, and properly handle deceased wildlife.
- Identify resources and logistics support requirements.

The Wildlife Rehabilitation Group Supervisor reports directly to the Wildlife Branch Director.

3640 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.
- 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 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 care.
4000 Planning Section – Incident Command System

4100 Planning Section Organization

The Planning Section is responsible for the collection, evaluation, and dissemination of operational information related to the incident. In addition to the allocation of incident information, the Planning Section is responsible for the management of the Planning Process in the development of the IAP. The Planning Section is compromised of the following:

**Resource Unit Leader (RESL):** Responsible for maintaining the status of all assigned tactical resources and personnel at an incident. This is achieved by overseeing the check-in of all tactical resources and personnel, and using a status system that indicates the current location and status of these resources. The RESL may also employ Check-in/Status Recorders to assist with the check-in process to ensure accountability.

**Situation Unit Leader (SITL):** Primary node for information management, which may include both classified and unclassified information. The SITL is responsible for collecting, processing, organizing, and disseminating incident information relating to the status of current operations, incident growth, mitigation, or intelligence activities taking place on the incident. The SITL may also employ Display Processors and Field Observers to display incident information and collect situational information from the field, respectively.

**Documentation Unit Leader (DOCL):** Responsible for the maintenance of accurate, up-to-date incident documentation which is critical to post-incident analysis (including IAPs, incident reports, communications logs, injury claims, and situation status reports). The DOCL should ensure that each Section is maintaining and providing appropriate documents. Additionally, the DOCL will store incident files for legal, analytical, and historical purposes.

**Demobilization Unit Leader (DMOB):** Responsible for developing the incident Demobilization Plan. On large incidents, demobilization can be very complex, requiring a separate planning activity. The DMOB may also employ a Lessons Learned Collection Manager to collect responder observations, insights, and lessons at an incident for inclusion in an After Action Report.

**Environmental Unit Leader (ENVL):** Responsible for environmental matters associated with the response, strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The ENVL prepares environmental data for the Situation Unit, and should be from a public environmental or natural resource management agency to ensure compliance with applicable laws, regulations, and ordinances. The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) will work closely with the Environmental Unit, but does not typically fill the ENVL position.
**Marine Transportation System Recovery Unit Leader (MTSL):** Responsible for planning infrastructure recovery for transportation security incidents (TSI) and other incidents that significantly impact the Marine Transportation System (MTS). The MTSL will track and report on the status of the MTS, understand critical recovery pathways, recommend courses of action, and provide all MTS stakeholders with an avenue of input to the response organization.

**Technical Specialists (THSPs):** Certain incidents or events may require the use of THSPs who have specialized knowledge and expertise. THSPs are managed by the Planning Section but may be assigned to any Section where their services are required.

For more information pertaining to the Planning Section, refer to the United States Coast Guard Incident Management Handbook (2014) or access the following site: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

**4110 Operational Planning Cycle**

Short-term responses can typically be handled at the local level and may only require an ICS-201 (Incident Briefing Form), however; on larger incidents, the Incident Management Team (IMT) may require an IAP to track/assess Incident Objectives. During these responses, it is the responsibility of the Planning Section to manage the Operational Planning Cycle in accordance with principles set forth in the Incident Command System (ICS) and National Incident Management System (NIMS). This standardized Planning Cycle allows response personnel to fall into a rhythm and manage these large responses by compartmentalizing various aspects of response into a revolving process.

![Operational Planning Cycle Diagram](image)

Figure 4110-1 Operational Planning Cycle
During these large-scale, long-term responses, local responders may request an IMT or Spill Management Team (SMT) to alleviate the burden on local resources. Local responders should plan on managing the incident until a transfer of command is conducted, and will be heavily involved in the following phases of the process:

- Incident/Event Occurs
- Notifications
- Initial Response & Assessment

Once the IMT/SMT reports to the incident the Operational Planning Process will begin at the Incident Brief (ICS 201) at will transition from Initial Response and will enter Operational Periods (the “O”) until the incident has returned to a manageable level for local responders. The following meetings/events will take place once the IMT/SMT arrives on-scene:

- Incident Brief (ICS 201)
- Initial UC Meeting
- UC Objectives Meeting
- Command & General Staff Meeting
- Tactics Meeting
- Planning Meeting
- IAP Prep & Approval
- Operations Brief
- Execute Plan & Assess Progress
4110.1 Incident Briefing (ICS 201)

During the transfer of command process, an ICS 201 Form may be utilized to pass pertinent information to the oncoming Incident Management Team (IMT). If an ICS 201 Form has not been filled out, the Initial IC will provide the most up to date information pertaining to the response thus far. Oncoming IMT personnel should reassess this information following the brief to verify resources as well as the current situation.

Most importantly, this brief functions as an overview of response actions and lays out the current objectives, plans, and impacts. This briefing, or form, will be utilized by the oncoming team until a formal Incident Action Plan is developed by the IMT.

![Figure 4110-2: Incident Brief (ICS 201) General Tasks](image)

Incident Brief (ICS 201) Agenda

1. Current situation (territory, exposures, safety concerns, etc.; use map and/or charts).
2. Facilities established.
3. Initial Objectives and priorities.
5. Current on-scene organization.
6. Methods of communication and current frequencies used.
7. Resource assignments.
8. Resources ordered and/or en route.
10. Notifications completed.
4110.2 Initial Unified Command Meeting

Provides UC members with an opportunity to discuss and concur on important issues prior to the UC Objectives Meeting. The meeting should be brief and all important decisions and direction shall be documented. Prior to the meeting, ICs should review, and prepare to address, the agenda items. The results of this meeting will help to guide the overall response efforts.

**Figure 4110-3 Initial UC Meeting General Tasks**

**Initial UC Meeting Agenda**

1. Meeting brought to order, review ground rules and agenda.
2. Identify and include the agencies and organizations that need to be represented in the UC to accomplish IC/UC objectives.
3. Identify assisting/coordinating agencies and organizations that are needed to accomplish the IC/UC objectives.
4. Validate makeup of newly formed UC.
5. Clarify UC roles and responsibilities.
6. Review agency policies.
7. Negotiate and agree on key decisions which may include:
   a. UC jurisdictional boundaries and focus (Area of Responsibility).
   b. Name of incident.
   c. Overall response organization, including integration of assisting and cooperating agencies.
   d. Location of the Incident Command Post (ICP) and other critical facilities.
   e. Operational period length/start time and work shift hours.
   f. Command and General Staff composition, including Deputies.
8. Summarize and document key decisions.

**4110.3 Objectives Meeting**

The UC will set response priorities, identify limitations and constraints, develop incident objectives, and establish guidelines for the Incident Management Team (IMT) to follow. For recurring meetings, all products will be reviewed and updated as needed. Products resulting from this meeting along with decisions and direction from the Initial UC Meeting will be presented at the Command and General Staff Meeting.

**UC Objectives Meeting Agenda**

1. Planning Section Chief (PSC) brings meeting to order, conducts roll call, and reviews ground rules and agenda.
2. Review and/or update key decisions.
3. Develop or review and update response Priorities, Limitations, and Constraints.
4. Develop or review incident objectives.
5. Develop or review Critical Information Requirements and information flow.
6. Develop, or review and update, key procedures which may include:
   a. Managing sensitive information.
   b. Resource request and ordering process.
   c. Cost sharing and cost accounting.
   d. Operational security issues.
7. Develop, review, and update tasks for Command & General staff to accomplish.
8. Agree on division of UC workload.
9. Prepare for the Command and General Staff Meeting.
4110.4 Command & General Staff Meeting

The IC / UC will present their decisions and management direction to the Command and General Staff members. This meeting should clarify and help to ensure understanding among the core Incident Management Team (IMT) members of the decisions, objectives, priorities, procedures, and tasks that the UC has discussed and reached agreement on. Ensuing Command and General Staff Meetings will cover any changes in command direction, review open actions, and status of assigned tasks.

Figure 4110-5 Command & General Staff General Tasks

Command & General Staff Meeting Agenda

1. Planning Section Chief (PSC) brings meeting to order, conducts roll call, covers ground rules, and reviews agenda.
2. Situation Unit Leader (SITL) conducts situation status briefing.
3. Safety Officer (SOFR) provides safety status briefing highlighting any near misses or injuries requiring medical attention beyond first aid.
4. IC/UC:
   a. Provides comments.
   b. Reviews priorities, limitations, and constraints. Reviews key decisions and procedures.
   c. Discuss incident objectives.
   d. Reviews Critical Information Requirements and their time criticality.
5. PSC facilitates open discussion to clarify priorities, objectives, assignments, etc.
6. IC/UC provides closing comments.
7. PSC covers next meeting and planning process assignments.
4110.5 Tactics Meeting

This 30-minute meeting produces operational input needed to support the IAP. This meeting presents an opportunity for the Operations Section Chief (OSC) to develop a tactical plan, while soliciting input from the General Staff. The only Command Staff member present will be the Safety Officer (SOFR).

Tactics Meeting Agenda

1. Planning Section Chief (PSC) brings the meeting to order, conducts roll call, covers ground rules, and reviews agenda.
2. Situation Unit Leader (SITL) reviews the current and projected incident situation.
3. PSC reviews incident operational objectives.
4. OSC/ISC reviews the Work Analysis Matrix (ICS 234-CG) strategies and tactics.
5. OSC reviews and/or completes Operations Section organizational chart.
6. OSC/ISC reviews or completes the Operational Planning Worksheet (ICS 215).
7. Resource Unit Leader identifies needed tactical resources.
8. Safety Officer (SOFR) reviews and completes the Safety Analysis (ICS 215a).
9. LSC discusses and resolves any logistical issues.
10. FSC discusses and resolves and finance issues.
11. PSC reviews functional tasks/open actions using the Open Action Tracker (ICS 233-CG).
12. PSC covers next meeting and planning process assignments.

Figure 4110-6 Tactics Meeting General Tasks
4110.6 Planning Meeting

The Operations Section Chief (OSC) will present the proposed plan to the Command and General Staff for review and comment. This meeting provides the opportunity for Command and General Staff to discuss and resolve any issues and concerns prior to the Planning Section Chief (PSC) assembling the IAP.

Planning Meeting Agenda

1. Planning Section Chief (PSC) brings the meeting to order, conducts roll call, covers ground rules, and reviews agenda.
2. IC / UC provide opening remarks.
3. Situation Unit Leader provides briefing on current situation.
4. Safety Officer (SOFR) provides safety status briefing.
5. PSC reviews Command’s incident priorities, decisions, and objectives.
6. Operations Section Chief (OSC) covers current & planned operations (ICS 215).
7. PSC reviews proposed plan to ensure Command’s priorities/objectives are met.
8. PSC reviews/validates responsibility for any open actions/tasks (ICS 233-CG).
9. PSC solicits final input from each Command & General Staff member.
10. PSC solicits Command & General Staff commitment to the proposed plan.
11. PSC requests Command approval of the plan.
12. PSC covers next meeting and planning process assignments.

Figure 4110-7 Planning Meeting General Tasks
4110.7 IAP Prep & Approval

Appropriate Incident Management Team (IMT) members must immediately complete the assigned task and/or products from the Planning Meeting that are needed for inclusion in the IAP. These products must meet the deadlines set forth by the Planning Section Chief (PSC) to ensure the timely completion of the IAP. The deadline must be early enough to permit timely IC / UC review, approval, and duplication of sufficient copies for the Operations briefing and other IMT members.

**IAP Common Components**

1. Cover Sheet
2. Incident Objectives (ICS 202)
3. Organization Assignment List (ICS 203)
4. Assignment List (ICS 204)
5. Radio Communications Plan (ICS 205)
6. Medical Plan (ICS 206)
7. Incident Organization Chart (ICS 207)
8. Incident Map and Chart
9. Weather / Tide Forecast

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![Figure 4110-8 IAP Prep & Approval General Tasks](image_url)
4110.8 Operations Brief

This 30-minute, or less, briefing presents the IAP to the Operations Section oncoming shift supervisors. After this briefing has occurred and during shift change, off-going supervisors should be interviewed by their relief and by the Operations Section Chief (OSC) to validate IAP effectiveness. The Division/Group Supervisor (DIVS) may make last minute adjustments to tactics under their purview. Similarly, a supervisor may reallocate resources within that Division/Group to adapt to changing conditions.
Operations Briefing Agenda

1. PSC opens briefing, covers ground rules, agenda, and takes roll call of Command and General Staff as well as Operations personnel required to attend.
2. PSC reviews IC / UC objectives, Critical Information Requirements, and changes to the IAP.
3. IC/UC provides remarks.
4. Situation Unit Leader (SITL) conducts Situation Briefing.
5. OSC discusses current response actions and accomplishments.
6. OSC briefs Operations Section personnel.
7. Logistics Section Chief (LSC) covers transport, communications, and supply updates.
8. Finance Section Chief (FSC) covers fiscal issues.
9. Public Information Officer (PIO) covers public affairs and public information issues; Liaison Officer (LOFR) covers interagency issues.
10. Safety Officer (SOFR) provides a safety briefing.
11. PSC solicits final comments, and adjourns briefing.

4110.9 Execute Plan & Assess Progress

Assessment is a continuous activity used to help adjust current operations and help plan for future operations. Following the briefing and shift change, all Command and General Staff Section Chiefs will review the incident response progress and make recommendations to the IC / UC in preparation for the next IC/UC Objectives Meeting. This feedback is continuously gathered from various sources, including Field Observers (FOBS), responder debriefs, stakeholders, etc. IC/UC should encourage Command and
General Staff to get out of the Incident Command Post (ICP) and view firsthand the areas of the incident they are supporting.

**Figure 4110-10 Assessment General Tasks**

- **Incident Commander**
  - Monitors on-going incident management activities.
  - Evaluates prior decisions, direction, priorities, Critical Information Requirements, and task assignments.

- **Operations**
  - Monitors on-going operations and makes strategic and tactical changes as necessary.
  - Measures/ensures progress towards assigned objectives.
  - Briefs Command on a scheduled basis.

- **Planning**
  - Ensures on-going operational information is being collected and documented.
  - Develops new/revised incident objectives and provides to IC/UC.

- **Finance/Admin**
  - Monitors on-going operations to ensure accurate and timely administrative and financial reporting.

- **Safety Officer**
  - Monitors on-going operations and corrects unsafe practices.
  - Evaluates effectiveness of ICS 215a-CG and Site Safety Plan.
4200 Situation Unit

The Situation Unit is responsible for collecting, processing, organizing, and disseminating incident information relating to the status of current operations, incident growth, mitigation, or intelligence activities taking place on the incident. The Situation Unit may prepare future projections of incident growth, maps, and intelligence.

The major responsibilities of the Situation Unit Leader (SITL) include:

- Begin collection and analysis of incident data as soon as possible.
- Prepare, post, and disseminate resource and situation status information as required, including special requests.
- Request and direct Display Processor(s) (DPRO) and/or Field Observers (FOBS) as needed.
- Develop the Information Management Plan, as required, in coordination with the Public Information Officer, Liaison Officer, Operations Section Chief, Planning Section Chief, Logistics Section Chief, and Communications Unit Leader for IC / UC approval.
- Prepare future projections of incident growth, maps, intelligence, and other incident specific predictions as requested by the Planning Section Chief.
- Coordinate with the Communications Unit Leader to develop capabilities and capacities to support the information management methodologies.
- Prepare the Incident Status Summary (ICS 209).
- Provide charts, maps, and overlay imagery.
- Conduct situation briefings at meetings and briefings as required by the Planning Section Chief.

For additional information pertaining to the roles/responsibilities of the Situation Unit Leader refer to the following link: https://homeport.uscg.mil/ics

4200.1 Display Processors

The Display Processor (DPRO) works for the Situation Unit Leader (SITL) and is responsible for the display of incident status information obtained from the Field Observer(s), resource status reports, photographs, video, and other imagery.

The major responsibilities of the DPRO include:

- Determine the following:
  - Location of work assignment.
  - Numbers, types, and locations of displays required.
  - Priorities.
  - Map/Chart requirements for the IAP
  - Time limits for completion.
- Obtain necessary equipment and supplies.
- Assist SITL in analyzing and evaluating field reports.
- Develop required displays in accordance with time limits for completion.

Examples of displays include:
- GIS information.
- Demographic information.
- Incident projection data.
- Enlargement of ICS forms.

- Manage the available Common Operating Picture (COP).
- Ensure the accuracy of the information displayed.
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Display Processor refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 4200.2 Field Observer

The Field Observer(s) (FOBS) work for the Situation Unit Leader (SITL) and are responsible for collecting situation information from personal observations at the incident.

The major responsibilities of the FOBS include:

- Determine the following:
  - Location of work assignment.
  - Numbers, types, and locations of displays required.
  - Priorities.
  - Time limits for completion.
  - Method of communication.
  - Method of transportation.

- Obtain necessary equipment and supplies.
- Coordinate with the Operations Section Chief, Operations Branch Director, Division/Group Supervisor, Strike Team Leader, Task Force Leader, Single Resource(s), and Staging Area Manager.
- Gather data to support the Critical Information Requirements.
- Gather date related to:
  - Perimeters of the incident.
  - Locations of trouble spots.
  - Weather conditions.
  - Hazards.
  - Progress of operations.
  - Status of resources.

- Be prepared to identify all facility locations.
- Report information to the SITL by established procedure.
- Immediately report any condition that may be a safety hazard to personnel.
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Field Observer refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)
4210 Situational Display (Charts / Maps)

Various methods may be established for displaying situational information to the Unified Command. The method of choice will depend on availability of resources, the kind of system used (e.g. GIS / MISLE), and the command post physical layout.

NOAA National Ocean Service: Environmental Sensitivity Index (ESI) Maps serve as quick references for oil and chemical spill responders and coastal zone managers.

These ESI Maps contain three kinds of information:

1. Shorelines are ranked based on their physical and biological character, then color-coded 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 to display incident information must be appropriate for use by response personnel. The more detailed the display, the better it is for tactical resources.

4220 Weather / Tide / Currents

NOAA National Weather Service (NWS) 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.

The National Data Buoy Center (NDBC) is an agency within the NOAA NWS. 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.
- Current situation (boundaries, weather, tides, currents, etc).
- Predictions and potential impacts of what could happen if weather does not cooperate, including mitigation strategies thereof.
- Schedule meeting times and locations (ICS 230).

Display equipment may be in short supply at the onset of an incident, however, response personnel can request for supplemental materials through the Supply Unit located in the Logistics Section via an ICS 213 RR Form.
Throughout the course of the response, operational reports will be updated and released for formal dissemination. These reports can be influenced by numerous sources including, but not limited to:

- Field Observers
- Division/Group Supervisors
- National Weather Service (NWS)
- National Data Buoy Center (NDBC)
- Volunteers
- Stakeholders
- Liaison Officer
- Public Information Officer

Once new information is received, the Situation Unit will then be tasked to verify the information prior to inclusion in an official report. Once verified, the Unit will log the information on the following Operational Reports and will release the information in accordance with direction provided by the IC / UC:

- Incident Status Summary (ICS 209)
- Situation / Pollution Report (USCG / EPA)
- Executive Summaries (State / Federal)

Once an Operational Report is developed, and released, the Situation Unit is responsible for displaying the updated information on the “Story Board” for response personnel. The Situation Unit is solely responsible for ensuring that the Common Operating Picture (COP) is maintained throughout the response, and ensuring that information is released in a timely manner is paramount in the success of the Unit.

The Resource Unit is responsible for maintaining the status of all assigned tactical resources and personnel at an incident. This is achieved by overseeing the check-in of all tactical resources and personnel, and using a status system that indicates the current location and status of all these resources.

The major responsibilities of the Resource Unit Leader (RESL) include:

- Establish the check-in function at incident locations.
- Prepare the Organization Assignment List (ICS 203) and Incident Organization Chart (ICS 207).
- Prepare appropriate parts of the Assignment List (ICS 204).
- Maintain a master roster of all tactical resources checked in at the incident and post their current status and location using the Resource Status Card (ICS 219) or an electronic resource tracking system.
- Request Resources from the Logistics Section Chief via the Resource Request Message (ICS 213-RR-CG).
- Attend meetings and briefings as required by the Planning Section Chief (PSC).
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Resource Unit Leader refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 4300.1 Check-In / Status Recorder

The Check-in / Status Recorder (SCKN) works for the Resource Unit Leader (RESL) to check-in incident personnel at check-in locations and ensure that all resources assigned to an incident are accounted for.

The major responsibilities of the SCKN include:

- Obtain required work materials, including Check-In Lists (ICS 211), Resource Status Cards (ICS 219), and status display boards or T-Card racks.
- Post signs so that arriving resources can easily find incident check-in location(s).
- Record check-in information on Check-in Lists (ICS 211).
- Transmit check-in information to the RESL.
- Receive, record, and maintain resource status information on Resource Status Cards (ICS 219) for incident-assigned tactical resources, and overhead personnel.
- Maintain files of Check-in Lists (ICS 211).
- Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Check-in / Status Recorder refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 4310 Resource Management

Once established, the Incident Management Team (IMT) will maintain the accountability of all assigned personnel and resources through the Resource Unit. Once a resource is procured, the IMT is responsible for tracking that resource from the moment it departs home base and up until it returns to its point of origin. An ICS 211 Form: Check-In List will be utilized to maintain the accountability of resources throughout the incident. Once demobilized, the resource will fill out an ICS 221: Demobilization Check-Out Form prior to departing the incident location and returning to home base.

### 4400 Documentation Unit

The Documentation Unit is responsible for the maintenance of accurate, up-to-date incident documentation which is critical to post-incident analysis. Examples of incident documentation include Incident Action Plans (IAPs), incident reports, communications logs, injury claims, and situation status reports. Some of these documents may originate in other Sections. The Documentation Unit should ensure each Section is maintaining and providing appropriate documents. The Documentation Unit Leader (DOCL) will provide duplication and copying services for all other Sections. The Documentation Unit will store incident files for legal, analytical, and historical purposes.
The major responsibilities of the DOCL include:

- Set up work area and begin organization of incident files.
- Develop a documentation plan to include archival or all incident specific information data as defined in the Information Management Plan.
- Coordinate with the Communications Unit Leader (COML) to ensure electronically stored information meets legal documentation and archival requirements.
- To the greatest extent possible, the data archive should be readily recoverable and searchable.
- Ensure appropriate level of documentation storage is maintained based on the level of classification of the information being stored.
- Maintain the Incident Open Action Tracker (ICS 233-CG).
- Establish duplication service and respond to duplication requests.
- File all official forms and reports.
- Develop a Freedom of Information Act (FOIA) plan in coordination with the Liaison Officer (LOFR) and with appropriate legal input.
- Review records for accuracy and completeness, and inform units of errors or omissions.
- Provide incident documentation as requested.
- Organize files for submitting final incident documentation package.
- Submit incident documentation to the operational commander for maintenance and disposition.
- Maintain Unit Log (ICS 214).

For additional information pertaining to the roles/responsibilities of the Documentation Unit Leader refer to the following link: https://homeport.uscg.mil/ics

### 4410 OSLTF Documentation Requirements

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 On-Scene Coordinator will make the documentation available to natural resource trustees to help them determine the actual or potential natural resource injuries.

### 4500 Demobilization Unit

The Demobilization Unit is responsible for developing the Incident Demobilization Plan. On large incidents, demobilizing can be very complex, requiring a separate planning activity. Note that not all organizations require specific demobilization instructions. The
Demobilization Unit is responsible for incident personnel up until they safely arrive back to their home of record, or home base. Although resources are required to check-in with the Demobilization Unit after arriving home, it is ultimately the responsibility of the Demobilization Unit to account for these resources.

The major responsibilities of the Demobilization Unit Leader (DMOB) include:

- Review incident resource records to determine the likely size and extent of demobilization effort and develop a resource matrix.
- Coordinate demobilization with Agency Representatives.
- Monitor the on-going Operations Section resource needs.
- Identify surplus resources and probable release time.
- Establish communications with off-incident facilities, as necessary.
- Develop an Incident Demobilization Plan (Chapter 8.6) that should include:
  - General information section.
  - Responsibilities section.
  - Release priorities.
  - Release procedures (including unique procedures needed for Reserve members).
  - Demobilization Checkout Form (ICS 221).
  - Directory.
- Prepare appropriate directories (e.g., maps and instructions) for inclusion in the demobilization plan.
- Track all demobilized tactical resources and overhead personnel to their home unit.
- Distribute demobilization plan (on and off-site).
- Provide status reports to appropriate requestors.
- Ensure that sections and units understand their specific demobilization responsibilities.
- Supervise execution of the Incident Demobilization Plan.
- Brief the Planning Section Chief (PSC) on demobilization progress.
- Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Demobilization Unit Leader refer to the following link: https://homeport.uscg.mil/ics

4500.1 Lessons Learned Collection Manager

The Lessons Learned Collection Manager (LLCM) works directly for the Demobilization Unit Leader (DMOB) and is responsible for managing active and passive collection of responder observations, insights, and lessons at an incident. The major responsibilities of the LLCM include:

- Manage the Lessons Learned Collection Team(s).
- Develop a lessons learned collection process.
• Gather and provide pertinent lessons learned and best practices from previous incidents or events to each activated Section.
• Coordinate with the Command and General Staff to capture emerging issues, corrective actions, and potential lessons learned.
• Prepare, distribute, and collect standard collection forms to identify emerging issues, recommended corrective actions, and lessons learned.
• Analyze incident or event observations.
• Identify corrective actions and potential lessons learned from collected observations and best practices.
• Manage the development of the After Action Report (AAR).
• Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Lessons Learned Collection Manager refer to the following link: https://homeport.uscg.mil/ics

4600 Environmental Unit

The Environmental Unit is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The Environmental Unit Leader (ENVL) prepares environmental data for the Situation Unit. The ENVL should be from a public environmental or natural resource management agency to ensure compliance with applicable laws, regulations, and ordinances.

The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) will work closely with the Environmental Unit but does not typically fill the ENVL position.

Technical Specialists (THSPs) frequently assigned to the Environmental Unit may include sampling, response technologies, trajectory analysis, weather forecast, resources at risk, shoreline clean-up assessment, historical/cultural resources, and waste disposal.

The major responsibilities of the ENVL include:

• Obtain briefing and special instructions from the Planning Section Chief (PSC).
• Coordinate actions with the NOAA SSC.
• Identify Environmentally Sensitive Areas, and recommend response priorities.
• Following consultation with natural resource trustees, provide input on wildlife protection strategies (e.g., removing oiled carcasses, pre-emptive capture, hazing, capture, treatment).
• Support the development of the Information Management Plan to ensure appropriate tasking, data collection, assessment, validation, and dissemination of information is conducted.
• Develop an Environmental Risk Communications enclosure to the Information Management Plan to assess and address stakeholder perceptions and concerns about environmental, safety, health risks, and hazards.
• Coordinate with the Liaison Officer (LOFR), Public Information Officer (PIO), and Safety Officer (SOFR) to sample, compile, and assess data for stakeholder coordination plan, social media plan, and risk communications appendix (e.g., sample results, pollutant transport and fate, seafood safety, and dispersant).
• Coordinate with the SSC and LOFR to develop an academia coordination plan as needed to address pollutant transport, fate, extent of contamination, and potential hazards to the public.
• Determine the extent, fate, and effects of contamination.
• Acquire, distribute, and provide analysis of weather forecasts.
• Monitor the environmental consequences of response actions.
• Develop Shoreline Clean-up and Assessment Plans.
• Identify the need for and prepare any special advisories or orders.
• Identify the need for and obtain permits, consultations, and other authorizations, including ESA provisions.
• Historical/Cultural Resources THSP, based on consultation with the FOSC, identifies and develops plans for protection of affected historical/cultural resources.
• Evaluate the opportunities to use various response technologies.
• Develop Disposal Plans.
• Develop a plan for collecting, transporting, and analyzing samples.
• Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Environmental Unit Leader refer to the following link: https://homeport.uscg.mil/ics

4610 Natural/Physical Environmentally Sensitive Sites

Numerous environmentally sensitive areas place a high priority on the rapid collection of oil. Several collection points have been identified in the Sector Mobile area. The majority of locations are suitable for vacuum truck (abundant) or skimmer units (few).

The Environmental Sensitivity Index lists 10 types of shorelines. Shoreline clean-up will be conducted in accordance with the shoreline sensitivity classification as outlined in the following sections.

For response purposes this plan has established three categories:

• **High Sensitivity (Class A)**
  o Coral Reefs
  o Vegetated River Banks
  o Salt Marsh and Mangrove Swamp
  o Sea Grass Beds
  o Freshwater Marshes and Swamps
  o Shellfish Harvesting Areas
• **Moderate Sensitivity (Class B)**
  o Fine Sand Beaches
  o Course/Mixed Sand Beaches
o Tidal Flats

- Low Sensitivity (Class C)
  o Sea Walls and Piers
  o Rocky Platforms

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 provide a more effective, and detailed delineation.

4700 Technical Specialists

Certain incidents or events may require the use of Technical Specialists (THSPs) who have specialized knowledge and expertise. THSPs are managed by the Planning Section, but may be assigned to any Section where their services are required.

The major responsibilities of the THSP include:

- Provide technical expertise and advice to Command and General Staff as needed.
- Attend meetings and briefings as appropriate to clarify and help to resolve technical issues within area of expertise.
- Attend press briefings and/or public open house meetings as needed for subject matter expertise.
- Provide technical expertise during the development of the IAP and other support plans.
- Work with the Safety Officer (SOFR) to mitigate unsafe practices.
- Work closely with the Liaison Officer (LOFR) to help facilitate understanding among stakeholders and special interest groups.
- Be available to attend press briefings to clarify technical information.
- Research technical issues and provide finding to the decision makers.
- Troubleshoot technical problems and provide advice on resolution
- Review specialized plans and clarify meaning.
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

The following are functional areas where THSP that may be useful during spill response:

- Hazardous substances Specialists
  o Product Specialist
  o Certified Marine Chemist
  o Certified Industrial Hygienist
  o Chemist or Chemical Engineer
  o Sampling

- Oil Specialists
  o Scientific Support Coordinator
  o Lightering
  o Salvage
  o Shoreline Clean-up Assessment
  o Natural Resource Damage Assessment
4710 Hazardous substances Specialists

The Hazardous substances Specialist is responsible for various hazardous substances assessments during incident operations.

The Hazardous substances Specialist can assist in:

- Providing ongoing monitoring of environmental conditions.
- Providing an initial and ongoing survey for, and identification of, the presence of hazardous substances.
- Implementing defensive mitigation practices when indicated.
- Directing emergency decontamination procedures.
- Providing assistance to medical personnel for information regarding chemical exposure and injuries.
- Ensuring Safety Data Sheets (SDS) are provided to response personnel.
- Ensuring all specialized equipment is maintained and calibrated according to the manufacturers’ specifications.

4710.1 Product Specialist

A Product Specialist is a 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.

Local Scientific Support Coordinator
Adam Davis, NOAA Disaster Response Center
(206) 549-7759
4710.2 Certified Marine Chemist

The Marine Chemist Association, Inc. is an independent professional organization composed of chemists certified by the National Fire Protection Association in accordance with the published rules. It had its origin 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:

- Promote the science of, and improve the method of evaluation and eliminating health, fire and explosion hazards in marine and associated industries.
- Obtain and circulate information relative to these hazards and other information regarding the professional and ethical activities of its members.
- Enhance the general welfare of its members by promoting a closer relationship with all concerned industry and regulatory bodies.

Local Certified Marine Chemist(s)

<table>
<thead>
<tr>
<th>Mississippi</th>
<th>Contact Number</th>
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<tbody>
<tr>
<td>D. Glynn Hair</td>
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<tr>
<td></td>
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<td>(228) 832-9797</td>
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<tr>
<th>Alabama</th>
<th>Contact Number</th>
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<tbody>
<tr>
<td>Tom D. Littlepage</td>
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<tr>
<th>Florida</th>
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<tbody>
<tr>
<td>John Edgar</td>
<td>(510) 909-3455</td>
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<tr>
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<td>(510) 909-3456</td>
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4710.3 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.
### Local Certified Industrial Hygienist(s)

<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Contact Number</th>
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<tbody>
<tr>
<td>Durward L. Weeks</td>
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<tr>
<th>Name</th>
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<tr>
<td>Lynn K. Clemmons</td>
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<th>Name</th>
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<tr>
<td>David A. DeRuiter</td>
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<td>Steven T. Luecke</td>
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<td>James Douglas Nelson</td>
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<td>David Jonathon Silver</td>
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<tr>
<td>Ajaykumar J. Thakkar</td>
<td>Tallahassee</td>
<td>(850) 422-1255</td>
</tr>
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#### 4710.4 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.

#### 4710.5 Sampling

The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) is responsible for providing a sampling plan for the coordinated collection, documentation, storage, transportation, and submittal to appropriate laboratories for analysis or storage.

**Local Scientific Support Coordinator**

Adam Davis, NOAA Disaster Response Center  
24-hr Contact: (206) 549-7759
During spill response, the Incident Management Team (IMT) may utilize oil spill specialists to aid in the response effort. These individuals provide various services to the response effort, and should be considered throughout the response effort. These individuals include, but are not limited to:

- NOAA Scientific Support Coordinator
- Lightering
- Salvage
- Shoreline Clean-up Assessment
- Natural Resource Damage Assessment
- Specialized Monitoring of Applied Response Technologies (SMART)
- Response Technology
- Decontamination
- Dredging
- Deepwater Removal
- Heavy Lift

Additional Points of Contact for spill response can be found in the Personnel and Services Directory.

**4720.1 Scientific Support Coordinator**

Normally, the National Oceanic and Atmospheric Administration (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.

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 can assist 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 clean-up, information management, contingency planning.
- Provides information on the sensitivity of coastal environments to oil and hazardous substances, natural resources at risk, and associated clean-up 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, including 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).

Local Scientific Support Coordinator
Adam Davis, NOAA Disaster Response Center
(206) 549-7759

4720.2 Lightering

Lightering is the process of removing oil or other hazardous chemicals from a compromised vessel to another vessel to prevent oil from spilling into the surrounding waters.

Lightering is not possible in all oil spill scenarios. It depends on many factors including the type of oil that is spilled. As time passes, the oil can become more viscous, or thicker, and therefore more difficult to pump. This can, in turn, make lightering difficult, if not impossible. While there are benefits to removing oil in this way, there can also be accidents and spills that result from lightering.

Lightering is also used to transfer cargo between vessels of different sizes like a barge and a bulker or oil tanker to reduce the vessel’s draft in order to enter port facilities.

Marine Spill Response Corporation (MSRC)
1-800-645-7745

4720.3 Salvage

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 Salvage Emergency Response Team (SERT) and the Navy’s Office of the Director of Engineering, Supervisor of Salvage and Diving (SUPSALV).

**USCG SERT**  
(202) 327-3985

**USN SUPSALV**  
(202) 781-0534

**USN Naval Sea Command**  
24-hr: (202) 781-3889

**4720.4 Shoreline Clean-up Assessment**

Shoreline Clean-up and Assessment Technique (SCAT) is a systematic method for surveying an affected shoreline after an oil spill.

The SCAT method originated during the response to the 1989 *Exxon Valdez oil spill*, when responders needed a systematic way to document the spill’s impacts on many miles of affected shoreline.

The SCAT approach uses standardized terminology to document shoreline oiling conditions. SCAT is designed to support decision-making for shoreline clean-up. It is flexible in its scale of surveys and in the detail of datasets collected.

SCAT is a regular part of the oil spill response. SCAT surveys begin early in the response to assess initial shoreline conditions, and ideally continue to work in advance of operational clean-up.

Surveys continue during the response to verify shoreline oiling, clean-up effectiveness, and eventually, to conduct final evaluations of shorelines to ensure they meet clean-up endpoints.

The SCAT process includes eight basic steps:

1. Conduct reconnaissance survey(s).
2. Segment the shoreline.
3. Assign teams and conduct SCAT surveys.
4. Develop clean-up guidelines and endpoints.
5. Submit survey reports and shoreline oiling sketches to the ICS Planning Section.
7. Conduct post-clean-up inspections.
8. Conduct final evaluation of clean-up activities.

Additional information pertaining to the SCAT process can be obtained from the National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC).
Local Scientific Support Coordinator
Adam Davis, NOAA Disaster Response Center
(206) 549-7759

4720.5 Natural Resource Damage Assessment

A major goal of the Oil Pollution Act of 1990 (OPA90) 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.

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.

4720.6 Specialized Monitoring of Applied Response Technologies (SMART)

The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC) is responsible for evaluating the opportunities to use dispersants, other chemical countermeasures, in-situ burning, and bioremediation. This includes the consultation and planning required to deploy and articulate environmental trade-offs.

Local Scientific Support Coordinator
Adam Davis, NOAA Disaster Response Center
(206) 549-7759

4720.7 Response Technology

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. 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.”

Local Scientific Support Coordinator
Adam Davis, NOAA Disaster Response Center
(206) 549-7759

4720.8 Decontamination

Decontamination is the process of removing or neutralizing contaminants that have accumulated on personnel and equipment.

Trained personnel in accordance with established standard operating procedures will perform decontamination. The Safety Officer will approve all decontamination procedures, equipment and stations. All workers must be decontaminated when leaving a contaminated area. All equipment and clothing from a contaminated area should be stored in a controlled area near the incident site until decontamination or proper disposal can be accomplished. Contaminated equipment such as containers, brushes, tools, etc., should be placed in labeled containers. Partially decontaminated clothing should be placed in plastic bags pending further decontamination or disposal. Respirators should be dismantled, washed and disinfected after each use. Suitable containment structures or portable containers will collect water used for tool and vehicle decontamination. Areas used for decontamination will be monitored for residual contamination.

Local Fire Departments have the requisite training to respond to oil/hazardous substances incidents and can coordinate the decontamination process. In the Sector Mobile Area of Responsibility it is recommended that personnel contact a 9-1-1 Dispatch Center to track down the appropriate Department.

4720.9 Dredging

Dredging is an excavation activity or operation usually carried out at least partly underwater, in shallow seas or fresh water areas with the purpose of gathering up bottom sediments and disposing of them at a different location. This technique is often used to keep waterways navigable.

USCG Sector Mobile, Waterways
(251) 648-2754
4720.10 Deepwater Removal

Offshore rigs throughout the Gulf of Mexico present a significant hazard to the marine environment, in the event that spills were to occur. As a result, various Private Resources located throughout the USCG Sector Mobile Area of Responsibility have the capability to respond to offshore, or deepwater, incidents.

4720.11 Heavy Lift

During spill response, heavy equipment may need to be utilized to remove the source from the environment. These are extremely hazardous operations, and will require oversight from a Safety Officer (or Assistant Safety Officer). This Area Contingency Plan provides contact information for various Private Resources throughout the USCG Sector Mobile Area of Responsibility (AOR).

4730 Generic Specialists

4730.1 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 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.

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<td>Main Desk</td>
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**Florida**

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<tr>
<td>Main Desk</td>
<td>FL Office of Cultural and Historic Programs</td>
<td>(850) 245-6300</td>
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**4730.2 Legal**

The United States Coast Guard (USCG) FOSC should consult with the USCG District Eight Legal Staff during an oil spill response. The Legal Service Command offers legal support within the USCG. The Chief of the Legal Division is the principle legal advisor and Staff Judge Advocate to Commander, Atlantic Area.

Additionally, cooperating/assisting agencies should consult with their prescribed legal authority during the course of response.

**4730.3 Chaplain**

A Chaplain is a non-denominational cleric, or lay representative of a religious tradition, attached to a secular institution such as a hospital, military unit, school, business, police department, fire department, university, or private chapel.

**Mississippi**

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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Captain Michael J. Johnson</td>
<td>Keesler Air Force Base</td>
<td>(228) 377-2111/4859</td>
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**Alabama**

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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Lieutenant David Pahs</td>
<td>USCG Sector Mobile</td>
<td>(251) 214-6416</td>
</tr>
<tr>
<td>Captain Torrey Garrison</td>
<td>United States Air Force</td>
<td>(251) 508-7166</td>
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**Florida**

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<tr>
<th>Name</th>
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<tr>
<td>Commander Steven Orren</td>
<td>Naval Air Station Pensacola</td>
<td>(850) 503-1293</td>
</tr>
<tr>
<td>Captain Dustin Creech</td>
<td>Eglin Air Force Base</td>
<td>(850) 218-2663</td>
</tr>
<tr>
<td>Lieutenant John Gibson</td>
<td>NSA Panama City</td>
<td>(850) 625-1408</td>
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**4730.4 Public Health**

Public health is the science of protecting and improving the health of families and communities through promotion of healthy lifestyles, research for disease, injury prevention, detection, and control of infectious diseases.
Overall, public health is concerned with protecting the health of entire populations. These populations can be as small as a local neighborhood, or as big as an entire country or region of the world.

Public health professionals try to prevent problems from happening or recurring through implementing educational programs, recommending policies, administering services and conducting research – in contrast to clinical professionals like doctors and nurses, who focus primarily on treating individuals after they become sick or injured. Public health also works to limit health disparities. A large part of public health is promoting healthcare equity, quality and accessibility.

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<tr>
<td>Name</td>
<td>Department / Company</td>
<td>Contact Number</td>
</tr>
<tr>
<td>Kerry Minninger</td>
<td>MS Public Health District 9</td>
<td>(601) 576-8085</td>
</tr>
<tr>
<td>Lori Musa</td>
<td>MS Public Health District 9</td>
<td>(228) 424-2631</td>
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<td>Name</td>
<td>Department / Company</td>
<td>Contact Number</td>
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<tr>
<td>Connie King</td>
<td>AL Public Health Area 8 (Mobile County)</td>
<td>(334) 293-6400</td>
</tr>
<tr>
<td>Chad Kent</td>
<td>AL Public Health Area 9 (Baldwin/Escambia County)</td>
<td>(251) 947-1910</td>
</tr>
<tr>
<td>Environmental Office</td>
<td>AL Public Health Area 9 (Baldwin/Escambia County)</td>
<td>(251) 947-3618</td>
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<tr>
<td>Name</td>
<td>Department / Company</td>
<td>Contact Number</td>
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<tr>
<td>Duty Officer</td>
<td>Florida Department of Health</td>
<td>(866) 786-4673</td>
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4730.5 Human Resources

Human Resources Specialists are required to maintain and enhance the organization’s human resources by planning, implementing, and evaluating employee relations and human resources policies, programs, and practices.

Human Resources Specialists can be obtained through the Volunteer Coordinator or Liaison Officer, and supervisors must determine whether or not prerequisite training is required prior to activating these individuals.

4730.6 Critical Incident Stress Management

Critical Incident Stress Management, or CISM, is an intervention protocol developed specifically for dealing with traumatic events. It is a formal, highly structured and professionally recognized process for helping those involved in a critical incident to share
their experiences, vent emotions, learn about stress reactions and symptoms and given referral for further help if required. It is not psychotherapy. It is a confidential, voluntary and educative process, sometimes called ‘psychological first aid’.

**USCG District 8**
Terry Blais, CISM Technician
Cell 504-628-5307

### 4730.7 Law Enforcement

Law enforcement is any system by which some members of society act in an organized manner to enforce the law by discovering, deterring, rehabilitating, or punishing people who violate the rules and norms governing that society.

If an Incident Management Team requires the support of local Law Enforcement personnel, it is recommended that they initially contact a 9-1-1 Dispatch Center to coordinate with local resources prior to the identification of a consistent Point of Contact.

### 4730.8 Search and Rescue

Search and Rescue (SAR) operations may be conducted by United States Coast Guard Search and Rescue Stations (coordinated through the Sector Mobile Command Center), and local response personnel (public and private entities).

**USCG Sector Mobile**
(251) 441-6211

### 4730.9 Marine Fire

The National Fire Protection Association (NFPA) outlines the requirements for a land-based firefighter to carry out maritime response operations. NFPA 1005 identifies the minimum Job Performance Requirements (JPRs) for land-based firefighters responsible for firefighting operations aboard commercial/military vessels over 50 ft involved in fire that call at North American ports or are signatory to the International Safety of Life at Sea (SOLAS) Agreement.

If an Incident Management Team requires the support of local personnel trained in marine firefighting, it is recommended that they initially contact a 9-1-1 Dispatch Center to coordinate with local resources prior to the identification of a consistent Point of Contact.

### 4800 Permits and Consultations

During spill response, various permits may be issued on behalf of the UCor issued to the RP. This Section will outline the following Federal and State documents and procedures:

- [Notice of Federal Interest](#)
- [Administrative Orders](#)
- [Notice of Federal Assumption](#)
• Letter of Designation
• Fish and Wildlife Permits
• Endangered Species Act Consultations
• National / State Historical Properties Preservation Consultations
• Disposal
• Ocean Dumping

4810 Notice of Federal Interest

The FOSC 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 FOSC 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 Federal Water Pollution Control Act (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 FOSC’s representative when the Notice is served. The FOSC’s representative shall retain the FOSC’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 RP 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 On-Scene Coordinator (OSC) or their representative issues an oral order, it should be immediately followed by a written document that contains the dialogue of the order.

The OSC may issue an Administrative Order for oil spills and hazardous substance releases under provisions of the Clean Water Act (CWA) and the Oil Pollution Act (OPA90) 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.
  o CWA defined harmful quantity of oil in 40 CFR 110.1
o CWA defined 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.
  o 33 CFR 1.01-80(d)(4), 40 CFR 300.322(b), or 33 USC 1321(e)(1)(B)
- Prior to issuing an Administrative Order, the affected State(s) must be notified.

If the RP fails to respond to an oil spill that is his/her responsibility, they are liable for a civil penalty of $40,000 per day of violation or an amount up to 3 times the removal cost incurred by the OSLTF.

A RP issued an Administrative Order for an oil pollution incident must direct the request for an appeal to the district courts of the United States.

4812 Notice of Federal Assumption

Under the Federal Water Pollution Control Act (FWPCA), Section (311)(l), 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 On-Scene Coordinator (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.

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 clean-up (e.g., clean-up resources that the polluter cannot or will not provide). Whenever it is necessary for the Federal government to expend funds in support of a clean-up 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 clean-up. 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.
NOTICE OF FEDERAL ASSUMPTION

Dear NAME:

A Notice of Federal Interest (NOFI) was provided to you or your representative on DATE. The NOFI informed you of the United States Government’s interest in a pollution incident at LOCATION for which you may considered to be financially responsible.

Your actions to abate this threat or to remove the oil and/or hazardous substance(s) and to mitigate the effects are unsatisfactory to the Federal On-Scene Coordinator, RANK NAME. Effective DATE/TIME, the United States Government will assume TOTAL OR PARTIAL response activities under the authority of Section 311 (c)(1) of the Federal Water Pollution Control Act, as amended AND/OR Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980. Although the Federal On-Scene Coordinator will begin directing the response activities, you are still required to follow any Administrative Orders that remain in effect. Further, federal assumption does not relieve you of your financial responsibilities and you may be liable for the cost of any response actions undertaken by the United States Government.

Should you have any questions concerning this matter, please contact NAME/TITLE at the address and telephone number listed above.

Sincerely,

NAME
RANK, U.S. Coast Guard
Federal On-Scene Coordinator / Representative

Provided to:

Print Name, Title of Representative authorized to accept Service, Signature, Date, Time

Witness:

Print Name/Title Signature, Date, Time
**4813 Letter of Designation**

**Notice of Designation of Source Policy:** Designation of a source under section 1014 of the Oil Pollution Act (OPA90) 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.”


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 On-Scene Coordinator immediately notifies the NPFC. The NPFC will then advertise as required under section 1014I 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 prior to conducting any bird rehabilitation operations.

Fill out the [Federal Fish and Wildlife Permit Application Form](mailto:permitsR4MB@fws.gov) and email the forms to permitsR4MB@fws.gov or send the completed forms to the Regional Permit Office:

Region IV Permit Office  
P.O. Box 49208  
Atlanta, GA 30359

**4830 Endangered Species Act (ESA) Consultations**

Section 7(a)(1) of the Endangered Species Act (ESA) requires all Federal agencies, in consultation with the National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service (NMFS), and the Department of the Interior (DOI) 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.

The [NOAA NMFS Protected Resources Division](http://www.nmfs.noaa.gov/pr) provides internal guidance and establishes national policy for conducting consultation and conferences pursuant to section 7 of the ESA, as amended.
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 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 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 State Historic Preservation Officer (SHPO) 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 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 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 National Historic Preservation Act (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.
• Un-surveyed 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.
• Identifying who will be responsible for providing expertise on historic properties and cultural resources to the FOSC during emergency response.
• 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.
• Determination that National PA cannot be satisfied.

MS Department of Archives and History
State Historic Preservation Office
(601) 576-6850

AL Historical Commission
(334) 242-3184

FL Department of State
Division of Historical Resources
(850) 245-6333

4870 Disposal

40 CFR 230 states that, “dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that such a discharge will not have an unacceptable adverse impact either individually or in combination with known and/or probable impacts of other activities affecting the ecosystems of concern”.

To ensure the proper disposal of these materials, the On-Scene Coordinator should contact the appropriate entity.
If the On-Scene Coordinator (OSC) / UC decide 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 Regional Response Team can assist in obtaining the appropriate permits from the EPA. 40 CFR 220.3 and 40 CFR 229.3 also contain guidance on emergency dumping permits.
5000 Logistics Section – Incident Command System

5100 Logistics Section Organization

The Logistics Section is responsible for providing facilities, services, people, and material in support of the incident. The LSC participates in the development and implementation of the IAP and supervises the branches and units within the Logistics Section. The LSC Job Aid, reference (a), should be reviewed regarding the organization and duties of the LSC. The Logistics Section is comprised of the following:

**Service Branch Director (SVBD):** The Service Branch Director is activated under the supervision of the LSC and is responsible for the management of all service activities at the incident. The Branch Director supervises the operations of the Communications, Medical, and Food Units.

**Communications Unit Leader (COML):** The COML is responsible for developing plans, obtaining, distributing, and supporting operation of computer and radio incident communications equipment and the data management infrastructure to support information flow.

**Medical Unit Leader (MEDL):** The MEDL, under the direction of the SVBD or LSC, is primarily responsible for the development of the Medical Plan, providing medical care, overseeing health of response personnel, obtaining medical aid and transportation for injured and ill response personnel, coordinating with other functions to resolve health and safety issues, and preparation of medical reports and records. Medical care for disaster victims is typically managed by the OSC and detailed in the IAP.

**Food Unit Leader (FDUL):** The FDUL is responsible for supplying the food needs for all tactical responders and overhead personnel, including all remote locations such as staging areas, as well as providing food for personnel unable to leave tactical field assignments. Food for disaster victims is typically managed under the Operations Section.

**Support Branch Director:** The SUBD is activated under the direction of the LSC and is responsible for the development and implementation of logistics plans in support of the IAP. The SUBD supervises the operations of the Supply, Facilities, Ground Support, and Vessel Support Units.

**Supply Unit Leader:** The SPUL is primarily responsible for receiving, inventorying, storing, and distributing all supplies, tactical resources, and personnel for the incident, including nonexpendable supplies and equipment.

**Facilities Unit Leader (FACL):** The FACL is primarily responsible for the setup, maintenance, and demobilization of incident facilities (e.g., Incident Base, ICP, and staging areas), as well as security services required to support incident operations. The FACL provides sleeping and sanitation facilities for incident personnel and manages
Incident facility operations. Each facility is assigned a manager who reports to the FACL and is responsible for operation of the facility. The FACL reports to the SUBD.

**Ground Support Unit Leader (GSUL):** The GSUL is primarily responsible for management of tactical equipment, vehicles, mobile ground support equipment and fueling services; transportation of personnel, supplies, food and equipment in support of incident operations; and implementing the Traffic Plan for the incident.

**Vessel Support Unit Leader (VSUL):** The VSUL is responsible for implementing the Vessel Routing Plan for the incident and coordinating transportation on the water and between shore resources. Since most vessels will be supported by their own infrastructure, the Vessel Support Unit may be requested to arrange fueling, dockage, maintenance, and repair of vessels on a case-by-case basis.

For more information pertaining to the Logistics Section, refer to the United States Coast Guard Incident Management Handbook (2014) or access the following site: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 5200 Support

The Support Branch is responsible for the development and implementation of logistics plans in support of the IAP. The Support Branch supervises the operations of the Supply, Facilities, Ground Support, and Vessel Support Units.

The major responsibilities of the Support Branch include:

- Obtain work materials.
- Identify Support Branch personnel dispatched to the incident.
- Determine support operations in coordination with the Logistics Section Chief and Service Branch Director.
- Prepare organization and assignments for support operations.
- Assemble and brief Support Branch personnel.
- Determine if assigned Support Branch resources are sufficient.
- Track progress of Branch and Unit work assignments.
- Resolve problems associated with requests from the Operations Section.
- Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Support Unit refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 5200.1 Supply Unit

The Supply Unit is primarily responsible for receiving, inventorying, storing, and distributing all supplies, tactical resources, and personnel for the incident, including nonexpendable supplies and equipment.

The major responsibilities of the Supply Unit include:
• Participate in Logistics Section / Support Branch planning activities.
• Receive and respond to requests for personnel, supplies, and equipment.
• Determine the type and amount of supplies, tactical resources, and personnel ordered and en route to include reporting of status and location.
• Review the IAP for information on operations of the Supply Unit.
• Develop and implement safety and security requirements.
• Service reusable equipment.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit for disposition.

For additional information pertaining to the roles/responsibilities of the Supply Unit refer to the following link: https://homeport.uscg.mil/ics

5200.2 Facilities Unit

The Facilities Unit is primarily responsible for the set, maintenance, and demobilization of incident facilities (e.g., Incident Base, Incident Command Post, and Staging Areas), as well as security services required to support incident operations.

The major responsibilities of the Facilities Unit include:
• Obtain a briefing from the Support Branch Director or Logistics Section Chief.
• Receive and review a copy of the IAP.
• Participate in Logistics Section/Support Branch planning activities.
• In conjunction with the Finance/Admin Section, determine locations suitable for incident support facilities and secure permission to use through appropriate means.
• Inspect facilities prior to occupation and document conditions and preexisting damage.
• Determine requirements for each facility, including the ICP.
• Prepare layouts of incident facilities.
• Notify Unit Leaders of facility layout.
• Activate incident facilities.
• Provide Facility Managers and personnel to operate facilities.
• Provide sleeping facilities.
• Provide security services.
• Provide food and water service.
• Provide sanitation and shower service.
• Provide facility maintenance services (e.g., sanitation, lighting, clean up, and trash removal).
• Inspect all facilities for damage and potential claims.
• Demobilize incident facilities.
• Maintain facility records.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.
For additional information pertaining to the roles/responsibilities of the Facilities Unit refer to the following link: https://homeport.uscg.mil/ics

5200.2.1 Incident Command Post

An Incident Command Post will initially be established at either Sector Mobile or Marine Safety Detachment (MSD) Panama City. The Responsible Party is invited to combine their command post at these locations to institute a UC at the earliest opportunity. This will allow the Responsible Party time to locate and organize an ICP. The actual location of the spill may determine whether the Sector or the MSD will take the lead in formulating a response to a spill, and where the ICP will be located. In addition to an ICP, 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 clean-up.

USCG Sector Mobile  (251) 441-5976
1500 15th Street
Mobile, AL 36615

MSD Panama City  (850) 814-8852
1700 Thomas Drive
Panama City, FL 32440

5200.2.2 Staging Areas

A Staging Area is a location established where resources can be placed while awaiting a tactical assignment. These areas are managed by the Operations Section.

The Geographic Response Plan (GRP) for the Sector Mobile ACP outlines various Staging Areas throughout the Area of Responsibility (AOR). This GRP outlines the street address, GPS position, operational hours, launch capabilities, water depth, etc. of these locations.

5200.3 Ground Support Unit

The GSUL is primarily responsible for management of tactical equipment, vehicles, mobile ground support equipment and fueling services; transportation of personnel, supplies, food and equipment in support of incident operations; and implementing the Traffic Plan for the incident.

The major responsibilities of the Ground Support Unit include:

- Participate in Support Branch/Logistics Section planning activities.
- Develop and implement the Traffic Plan in coordination with the ENVL.
- Support out-of-service resources.
- Notify the Resources Unit of all status changes on support and transportation vehicles.
- Arrange for and activate fueling, maintenance, and repair of ground resources.
• Maintain the Support Vehicle Inventory (ICS 218).
• Provide transportation services.
• Collect information on use of rented equipment.
• Requisition maintenance and repair supplies (e.g., fuel and spare parts).
• Maintain incident roads.
• Ensure vehicles are decontaminated prior to demobilization.
• Submit reports to SUBD as directed.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Ground Support Unit refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

### 5200.4 Vessel Support Unit

The VSUL is responsible for implementing the Vessel Routing Plan for the incident and coordinating transportation on the water and between shore resources. Since most vessels will be supported by their own infrastructure, the Vessel Support Unit may be requested to arrange fueling, dockage, maintenance, and repair of vessels on a case-by-case basis.

The major responsibilities of the Vessel Support Unit include:

• Obtain a briefing from the Support Branch Director or the Logistics Section Chief.
• Participate in Support Branch/Logistics Section planning activities.
• Coordinate development of the Vessel Routing Plan in coordination with the ENVL.
• Coordinate vessel transportation assignments with the Protection and Recovery Branch or other sources of vessel transportation.
• Coordinate water-to-land transportation with the Ground Support Unit, as necessary.
• Maintain a prioritized list of transportation requirements that need to be scheduled with the transportation source.
• Support out-of-service vessel resources, as requested.
• Arrange for fueling, dockage, maintenance, and repair of vessel resources, as requested.
• Maintain the Support Vehicle Inventory (ICS 218).
• Ensure vessels are decontaminated prior to demobilization.
• Submit reports to Support Branch Director as directed.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Vessel Support Unit refer to the following link: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)
5300 Service

The Service Branch is activated under the supervision of the Logistics Section Chief and is responsible for the management of all service activities at the incident. The Branch Director supervises the operations of the Communications, Medical, and Food Units.

The major responsibilities of the Service Branch include:

- Obtain working materials.
- Determine the level of service required to support operations.
- Confirm dispatch of Branch personnel.
- Participate in planning meetings of Logistics Section personnel.
- Review the IAP.
- Organize and prepare assignments for Service Branch personnel.
- Coordinate activities of Branch Units.
- Inform the LSC of Branch activities.
- Resolve Service Branch problems.
- Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Service Branch refer to the following link: https://homeport.uscg.mil/ics

5300.1 Communications Unit

The COML is responsible for developing plans, obtaining, distributing, and supporting operation of computer and radio incident communications equipment and the data management infrastructure to support information flow.

The major responsibilities of the Communications Unit include:

- Determine Unit personnel needs.
- Supervise Communications Unit activities.
- Support development and implementation of the Information Management Plan.
- Prepare and implement the Incident Radio Communications Plan (ICS 205).
- Obtain communications equipment and data management infrastructure.
- Develop contingency communications.
- Ensure the ICC and Message Center are established.
- Establish appropriate communications distribution and maintenance locations within the Incident Base.
- Ensure communications systems are installed, tested, and maintained.
- Ensure an equipment accountability system is established.
- Ensure personal portable radio equipment from cache is distributed per Incident Radio Communications Plan (ICS 205).
• Establish and maintain the data management infrastructure to include hardware, software, and data to support information management.
• Establish and maintain automatic data processing computer information technology (IT) services for all facilities when available.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Communications Unit refer to the following link: https://homeport.uscg.mil/ics

5300.2 Medical Unit

The Medical Unit, under the direction of the Service Branch Director or Logistics Section Chief, is primarily responsible for the development of the Medical Plan, providing medical care, overseeing health of response personnel, obtaining medical aid and transportation for injured and ill response personnel, coordinating with other functions to resolve health and safety issues, and preparation of medical reports and records. Medical care for disaster victims is typically managed by the Operations Section Chief and detailed in the IAP.

The major responsibilities of the Medical Unit include:

• Participate in Logistics Section/Service Branch planning activities, providing relevant medical input for strategy development.
• Establish the Medical Unit.
• Prepare the Medical Plan (ICS 206).
• Coordinate with SOFR, Operations, hazardous substance specialists, and others on proper personnel protection procedures for incident personnel.
• Prepare procedures for major medical emergency.
• Develop transportation routes and methods for injured incident personnel.
• Ensure incident personnel patients are tracked as they move from origin, to the care facility, and to final disposition.
• Provide continuity of medical care for incident personnel.
• Declare major medical emergency as appropriate.
• Provide or oversee medical and rehab care delivered to incident personnel.
• Monitor health of incident personnel including excessive incident stress.
• Respond to requests for medical aid, medical transportation, and medical supplies.
• Prepare and submit authorizations, reports, and administrative documentation related to injuries, compensation, or death of incident personnel, in conjunction with Finance/Admin Section.
• Coordinate personnel and mortuary affairs for incident personnel fatalities.
• Provide oversight and liaison for injured response personnel across the emergency medical care system.
• Implement procedures to protect medical records and Personally Identifiable Information (PII) in accordance with the Health Insurance Portability and Accountability Act (HIPAA).
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Medical Unit refer to the following link: https://homeport.uscg.mil/ics

5300.3 Food Unit

The Food Unit is responsible for supplying the food needs for all tactical responders and overhead personnel, including all remote locations such as staging areas, as well as providing food for personnel unable to leave tactical field assignments. Food for disaster victims is typically managed under the Operations Section.

The major responsibilities of the Food Unit include:

• Determine food and water requirements.
• Determine the method of feeding to best fit each facility or situation.
• Obtain necessary equipment and supplies.
• Ensure that well-balanced menus are provided.
• Account for responders who use incident supplied food services. Provide the information to Financial Section Chief for modifying per diem rates on orders.
• Order sufficient food and potable water from the Supply Unit.
• Maintain an inventory of food and water.
• Maintain food service areas, ensuring that all appropriate health and safety measures are being followed.
• Supervise Food Unit personnel as appropriate.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader for disposition.

For additional information pertaining to the roles/responsibilities of the Food Unit refer to the following link: https://homeport.uscg.mil/ics

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

The 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. For further information pertaining to the Communications Capabilities of the Coast Guard, contact the Sector Mobile Command Center at (251) 441-5976.
5410.1 Gulf Strike Team Command Trailer

The U.S. Coast Guard Gulf Strike Team has a Communications / Incident Command Post trailer with various VHF and UHF radio, and multiple telephone lines. To request this resource contact the duty watchstander at (251) 441-6601.

5410.2 Communications Frequencies

Frequencies monitored by the United States Coast Guard can be found in Figure 5410-1.

<table>
<thead>
<tr>
<th>Channel</th>
<th>Frequency</th>
<th>Use</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>156.3</td>
<td>Ship-to-Ship Safety</td>
<td>Also Utilized for Search and Rescue.</td>
</tr>
<tr>
<td>12</td>
<td>156.6</td>
<td>Vessel Traffic Service (VTS)</td>
<td>Not currently in use.</td>
</tr>
<tr>
<td>13</td>
<td>156.65</td>
<td>Bridge-to-Bridge</td>
<td>Message must be about ship navigation.</td>
</tr>
<tr>
<td>16</td>
<td>156.8</td>
<td>International Distress, Safety, and Calling</td>
<td>Only for hailing, distress, and Search and Rescue.</td>
</tr>
<tr>
<td>21A</td>
<td>157.5</td>
<td>U.S. Coast Guard Only</td>
<td></td>
</tr>
<tr>
<td>22A</td>
<td>157.1</td>
<td>USCG Liaison &amp; Maritime</td>
<td>Use this Channel to talk to Coast Guard and Public.</td>
</tr>
<tr>
<td>23A</td>
<td>157.15</td>
<td>U.S. Coast Guard Only</td>
<td>Working Frequency.</td>
</tr>
</tbody>
</table>

Figure 5410-1 USCG Monitored Frequencies
6000 Finance & Administration – Incident Command System

6100 Finance & Administration Section Organization

The Finance & Administration Section is responsible for all financial, administrative, and cost analysis aspects of the incident. The Finance & Administration Section is compromised of the following:

**Time Unit Leader (TIME):** Responsible for equipment and personnel time recording, and for managing the commissary operations. TIME may also employ an Equipment Time Recorder (EQTR) and/or a Personnel Time Recorder (PTRC).

**Procurement Unit Leader (PROC):** Responsible for administering all financial matters pertaining to vendor contracts, leases, and fiscal agreements.

**Compensation/Claims Unit Leader (COMP):** Responsible for the overall management and direction of all administrative matters pertaining to compensation for injury and claims related activities (other than injury) for an incident. COMP may also employ a Compensation for Injury Specialist (INJR) and/or a Claims Specialist (CLMS).

**Cost Unit Leader (COST):** Responsible for collecting all cost data, performing cost effectiveness analyses, and providing cost estimates and cost saving recommendations for the incident.

For more information pertaining to the Finance/Administration Section, refer to the United States Coast Guard Incident Management Handbook (2014) or access the following site: [https://homeport.uscg.mil/ics](https://homeport.uscg.mil/ics)

6200 Fund Access

Simplified guidance on cost recovery and access to funding for oil spills and hazardous substances releases is provided through the National Pollution Fund Center specifically within, Funding Guidance for Oil Spills and Hazardous substances Releases (2003).

6210 Federal On-Scene Coordinator 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 Ceiling and Numbers Assignment Processing System (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 conditions are both met:

1. There is a discharge of oil (33 USC 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
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.
   a. 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.
   b. 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 apply when the following conditions are met:

1. A hazardous substance (not oil per 33 USC 2701(23)) 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.
3. The 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.
   a. The CERCLA removal funding is limited to no more than $2 Million or 12 months in duration (though the Environmental Protection Agency may grant waivers to this requirement).
   b. The FOSC can obligate no more than $250,000 per incident without an approved Action Memorandum.
   c. There is no CERCLA funding for compensation payments to claimants damaged by hazardous substances.

Should a Federal Project Number (FPN) or CERCLA Project Number (CPN) that has been obtained prove unnecessary (no funds expended), the On-Scene Coordinator (OSC) must inform USCG District Eight 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 National Pollution Funds Center (NPFC), specifically through Chapter III of the NPFC User Reference Guide.

6210.1 FOSC Funding Process under ESF-10

The United States Coast Guard (USCG) and EPA are the Primary Agencies activated under Emergency Support Function 10 (ESF-10) – Oil and Hazardous substances Response.

Once ESF-10 is activated, the following funding process is enacted:
• Mission Assignments (MA) or Interagency Agreements (IAGs) are faxed to the USCG District by the ESF-10 Watch stander or the EPA.

• The District then operationally approves the MA or IAG and forwards the information to the National Pollution Funds Center (NPFC), noting the applicable MA Number and total funding authorized.

• The NPFC signs the MA or IAG and issues an accounting message with a Disaster Project Number (DPN).
  o Similarly to how a Federal Pollution Number (FPN) is used for oil spills for all operations/costs associated with the applicable MA or IAG.
  o Unlike the CERCLA or the OSLTF, the Stafford Act only pays for direct/actual costs and not the USCG standard rates used for pollution cases.

6220 State Access

State access to OSLTF and CERCLA funds provide 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 National Pollution Funds Center (NPFC) within 6 years of the clean-up.

2. 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.

Additional information pertaining to State Access to Federal Funds through the Oil Spill Liability Trust Fund, refer to Chapter 4 of the NPFC User Reference Guide.

6230 Trustee Access

Administrative Trustees are organizations with responsibilities for specific areas or natural resources such as the Department of the Interior. The Oil Pollution Act of 1990 (OPA90) authorizes these organizations access to the fund through one administrative trustee known as the Lead Administrative Trustee (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 National Pollution Funds Center (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.
The role of the Trustee in the funding process includes the following steps:

- Trustees must coordinate with each other during all phases of Natural Resource Damage Assessment (NRDA) to prevent the double recovery of damages.
- During the pre-assessment phase of 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 the NPFC.
- Trustees assess damages for the 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 Disaster Declaration of a major disaster or emergency, the Coast Guard FOSC may receive direct tasking in the form of a Mission Assignment, which is a work order issued by the Federal Emergency Management Agency (or other designated agency) directing the recipient agency to complete a specified task. The Coast Guard would then be activated under Emergency Support Function (ESF) 10 – Oil and Hazardous substances Response Annex per the National Response Framework.

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 Other Governmental Agencies (OGAs) and private vendors for each cost.

For oil spills and hazardous substances releases, the FOSC will receive a Request for Federal Assistance from FEMA or the ESF lead agency, including a cost ceiling, and will then proceed to respond as normal using the OSLTF and CERCLA funds. 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.

### 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.

The major responsibilities of the Cost Unit include:

- Coordinate with organizations on cost reporting procedures.
- Collect and record all cost data.
- Develop incident cost summaries.
• Prepare resources-use cost estimates for the Planning Section.
• Make cost saving recommendations to the Finance Section Chief.
• Ensure all cost documents are accurately prepared.
• Maintain cumulative cost records.
• Ensure Coast Guard cost documentation captures all costs associated with the incident using the Pollution Daily Resource Report (CG-5136).
• Coordinate with the Time Unit to ensure all personnel and equipment is captured using the CG-5136.
• Coordinate with the Procurement Unit and Supply Unit to ensure all obligations are entered in financial recording software.
• Complete account reconciliations as required by current financial policy.
• Complete all records prior to demobilizations.
• Maintain Unit Log (ICS 214) and forward to Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Cost Unit refer to the following link: https://homeport.uscg.mil/ics

6310 Cost Documentation

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/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 UC decisions on response action funding, determine whether other sources of funding apply.
2. Estimate the OSLTF and other funding ceilings required. In many responses, an OSLTF and CERCLA ceiling will be established.
   a. Depending on the decisions of the UC and limitations of the two funds, various response costs can be charged against one fund or the other.
   b. Similarly, other funds (Search and Rescue, vessel salvage, etc.) may also be established, each with its own independent ceiling.
3. Obtain a Federal Project Number (FPN) for the OSLTF, a CERCLA Project Number (CPN) for CERCLA funds, and authorized ceilings for all identified funds.
   a. The Ceiling and Numbers Assignment Processing System (CANAPS) issues FPN/CPN and authorized ceiling limits for funding certain removal actions associated with oil and hazardous waste spills.
4. If any fund advice is needed, contact the National Pollution Funds Center (NPFC).
   a. Regional Case Manager – (202) 795-6069
   b. Command Duty Officer – (202) 494-9118
   c. National Response Center – (800) 424-8802

5. Obtain copies of Pollution Removal Funding Authorizations (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 receipts and Daily Resource Reports (CG-5136) from the Time Unit.

8. Monitor U.S. Coast Guard and other UC operational forces on a daily basis.
   a. Collect copies of aircraft use logs and vessel operating/navigation logs in addition to the CG-5136 from the Time Unit.

9. Monitor Other Governmental Agencies (OGAs) operational forces on a daily basis.
   a. Collect SF-1080/1081 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, UC, and OGAs) against each fund ceiling. Include direct costs, anticipated costs, and track the obligations against the various ceilings on a daily basis.

11. Before a ceiling is reached, project the “burn rate” and advise the UC when a ceiling must be increased.
   a. With UC approval, increase various fund ceilings.

12. Compile and maintain an inventory of all equipment purchases by the purchasing agency and charged fund, daily.

13. Maintain daily reports of costs against a ceiling as required by the NPFC for the OSLTF and other funds/ceilings.

14. Develop a daily display and post copies at each Situation Unit display, under the direction of the Situation Unit Leader or Display Processor.

15. After the response, certify contractor invoices within the required timeframe. For NPFC/OSLTF contracts, the required timeframe is 10 days.
   a. Obtain and clearly identify the required timeframe for all other funds and track unit performance against these required cycle times.
   b. Certification will require acknowledgement from the Operations Section that the invoiced goods/services were received, including acknowledgement from the appropriate contracting official that the cost for the good/service are per the agreement.
16. Forward all approved contractor invoices to the appropriate agency processing center for payment, keeping copies for the UC’s record.

17. Within 120 days following clean-up, complete Financial Summary Reports for each and every fund or ceiling managed by the UC.

6310.1 Cost Documentation Assistance

There are two principle sources of assistance in documenting costs that are available to all organizations, the assigned Case Officer at the National Pollution Fund Center (NPFC) and the District Response Advisory Team (DRAT). 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 (BOA) 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 FOSC 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.

Additional information pertaining to cost documentation procedures forms, and completion reports, refer to the NPFC Technical Operating Procedures.

6320 Notice of Federal Interest (NOFI)

The Notice of Federal Interest (NOFI) informs the suspected spiller of liabilities and potential penalties, and is delivered to every suspected individual. Prior to issuing a NOFI the responder must ensure that they have a witness and present a form to every suspected individual (even if not currently present).

Once issued, the responder will retain a signed and dated copy. If the suspect refuses to sign the NOFI the responder must ensure the following actions take place:

- Note circumstances preventing a signature (sign and date).
- Ensure that a witness signs and dates the form, and considers the NOFI served.
- If Owner/Operator is not available, the NOFI shall be sent via Certified mail with a return receipt request.
6330 Letter of Federal Assumption

As soon as the FOSC determines that a Federal project will be initiated, a Letter of Federal Assumption should be served to the suspected discharger, or their representative. This letter, informs them of the FOSCs intentions and their potential liability for expended costs.

6340 Letter of Designation of Source

The On-Scene Coordinator (OSC) is responsible for notifying the National Pollution Funds Center (NPFC) of the source of a discharge, actual or potential. The NPFC must also be notified if the source is not identified. The NPFC should be contacted for guidance on procedures, or with any questions.

6350 Administrative/Directive Order

An Administrative Order is a set or specific clean-up instructions tasked to the RP if the OSC deems that the response effort is not done correctly, safely, or failed to meet expectations.

6400 Time Unit

The Time Unit is responsible for equipment/personnel time recording and for managing the commissary operations.

The major responsibilities of the Time Unit include:

- Determine incident requirements for time recording function.
- Determine resource needs.
- Contact appropriate organization personnel or Agency Representative’s (AREPs) regarding organization-specific time recording requirements.
- Ensure that daily personnel time recording documents are prepared and in compliance with each organizations policy.
- Maintain separate logs for overtime hours.
- Submit cost estimate data forms to the Cost Unit, as required.
- Maintain records security.
- Ensure that all records are current and complete prior to demobilization.
- Release time reports from assisting organization personnel to the respective AREPs prior to demobilization.
- Develop and implement procedures to protect Personally Identifiable Information (PII).
- Brief the Finance/Administration Section Chief (FSC) on current problems and recommendations, outstanding issues, and follow-up requirements.
- Coordinate with the Resource Unit Leader (RESL) to obtain copies of all check-in/check-out records each day.
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.
For additional information pertaining to the roles/responsibilities of the Time Unit refer to the following link: https://homeport.uscg.mil/ics

6500 Compensation / Claims Unit

The Compensation / Claims Unit is responsible for the overall management and direction of all administrative matters pertaining to compensation for injury and claims related activities (other than injury) for an incident.

The major responsibilities of the Compensation / Claims Unit include:

- Establish contact with the incident Medical Unit Leader (MEDL), Safety Officer (SOFR), and Liaison Officer (LOFR).
- Determine the need for Compensation for Injury Specialists (INJR), and Claims Specialists (CLMS), and order personnel as needed.
- Establish a compensation for injury work area within or as close as possible to the Medical Unit.
- Review the Medical Plan (ICS 206).
- Review and coordinate procedures for handling claims with the Procurement Unit.
- Brief the CLMS on incident activity.
- Periodically review logs and forms produced by the CLMS to ensure that they are complete, entries are timely and accurate, and that they are in compliance with organization requirements and policies.
- Keep the Finance/Administration Section Chief (FSC) briefed on Compensation/Claims Unit status and activity.
- Demobilize unit in accordance with the Incident Demobilization Plan.
- Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Compensation / Claims Unit refer to the following link: https://homeport.uscg.mil/ics

6600 Procurement Unit

The Procurement Unit is responsible for administering all financial matters pertaining to vendor contracts, leases, and fiscal agreements. Although the Procurement Unit works within the Incident Management Team (IMT) in support of the IC/UC, specific procurement policies, authorities, and procedures, which include emergency authorization procedures to expedite purchases, cannot be circumvented by the IC/UC. Coast Guard members serving as the Procurement Unit Leader (PROC) shall execute all procurements in accordance with the policies and procedures established by the CG Head of the Contracting Activity, Commandant (CG-91).

Major responsibilities of the Procurement Unit include:

- Review incident needs and any special procedures with Unit Leaders, as needed.
- Coordinate with local jurisdiction on plans and supply sources.
• Obtain the Incident Procurement Plan.
• Prepare and authorize contracts, building, and land-use agreements.
• Draft Memorandum of Understanding (MOU) as necessary.
• Establish contracts and agreements with supply vendors.
• Ensure that a system is in place that meets organization property management requirements.
• Interpret contracts and agreements to resolve disputes within delegated authority.
• Coordinate with the Compensation/Claims Unit for processing claims.
• Coordinate with the Supply Unit Leader (SPUL) and Cost Unit (COST) to ensure all obligations are entered in financial recording software and all costs are reconciled prior to demobilization.
• Coordinate with the SPUL to ensure all orders and purchases are screened for possible accountable/reportable property.
• Complete final processing of contracts and send documents for payment.
• Coordinate cost data in contracts with the COST.
• Brief the Finance/Administration Section Chief (FSC) on current problems and recommendations, outstanding issues, and follow-up requirements.
• Maintain Unit Log (ICS 214) and forward to the Documentation Unit Leader (DOCL) for disposition.

For additional information pertaining to the roles/responsibilities of the Procurement Unit refer to the following link: https://homeport.uscg.mil/ics

6610 Procurement Processes and Procedures

Should the FOSC wish to hire a contractor that has a BOA with the Coast Guard, the contractor is issued an Authorization to Proceed. The OSC must also send a message to the Shore Infrastructure Logistics Center (SILC) 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. The District Office 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 National Pollution Funds Center (NPFC).
Once a Federal Project Number (FPN) has been obtained, all message traffic must contain the NPFC and SILC as information addressees.
7000 Hazardous Substances

7100 Introduction

The release 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.

**Hazardous Substance:** Any substance designated as such by the administrator of the EPA pursuant to the CERCLA, regulated pursuant to Section 311 of the Federal Clean Water Act, or designated by the appropriate State authority.

**Harmful Quantity:** A quantity of a hazardous substance of which is determined to be harmful to the environment, public health/welfare, or may reasonably 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. These quantities are further outlined in 40 CFR 302.

**Safety Officer:** Per OSHA standards for hazardous waste operations and emergency response a Safety Officer shall be assigned to all hazardous substances incidents/responses. This rule regulates the safety and health of employees involved in clean-up operations at uncontrolled hazardous waste treatment, storage, and disposal operations conducted under the Resource Conservation and Releases Recovery Act of 1976 (RCRA). Additional information pertaining to the role of the Safety Officer during an HAZMAT incident can be found in Section 2200 of this plan.

**Chemical Hazards Response Information System (CHRIS):** 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.

**Emergency Response Guidebook (ERG):** A guide to aid first responders in quickly identifying the specific or generic hazards of the material(s) involved in the incident, and protecting themselves and the general public during the initial response phase of the incident.

**National Institute for Occupational Safety and Health (NIOSH) Pocket Guide:** Informs workers, employers, and occupational health professionals about workplace chemicals and their hazards. Clearly presents key data for chemicals or substance groupings (such as cyanides, fluorides, manganese compounds) that are found in workplaces. The guide offers key facts, but does not give all relevant data.
**Wireless Information System for Emergency Responders (WISER):** A system designed to assist emergency responders in hazardous substances incidents. WISER provides a wide range of information on hazardous substances, including substance identification support, physical characteristics, human health information, and containment/suppression advice.

**American Conference for Governmental Industrial Hygienists (ACGHI®) TLVs and BEIs:** Is a professional association of industrial hygienists and practitioners of related professions that advance occupational and environmental health TLVs® for chemical substances as a result of the evaluation of newly available data or re-evaluation of existing data. This information should be used during the release or discharge of any product that produces vapors or Volatile Organic Compounds (VOCs).
8000 Marine Firefighting

8100 Authority

This section provides guidance for responding to marine fires occurring at any location within the area of jurisdiction of the USCG Sector Mobile Federal COTP. The incident may involve one or more vessels (including stationary or offshore oil platforms/rigs), and any number of lives and cargoes in an almost infinite combination of circumstances. If the fire is not adequately managed, results may include significant loss of life, disruption of maritime commerce, and a potential release of pollutants into the U.S. navigable waterways.

The size, scope, and location of the marine fire will determine the level of response by various agencies and the extent to which operations are adversely affected.

In addition to the Coast Guard, many federal, state, and local agencies, as well as private industry, will be providing assistance with marine firefighting response operations. These organizations include:

1. Vessel owners and operators;
2. Facility owners and operators;
3. Municipal Fire and Police Departments;
4. Affected port authorities;
5. Contractor resources; and/or
6. Other interested parties

Assumptions

When planning for marine fire response, the following assumptions are made:
1. The size of the fire will exceed the capabilities and resources of the vessel or platform crew.
2. Vessel or platform condition and stability allow for safe firefighting activities to attempt to control and extinguish the fire.
3. The vessel, rig, or stationary oil platform fire has the potential of releasing oil or hazardous materials into U.S. navigable waters in harmful quantities.

8110 Policy and Responsibility

The senior fire service officer with jurisdiction over the location in which the shipboard fire occurs will serve as the IC. For other fires, the master of the affected vessel or another designated representative of the owner/operator will serve as the IC. The USCG shall not assume overall control of firefighting efforts when appropriate qualified fire service officers are present and able to assume command.

The ports and waterways facilities cover many miles of waterways, transiting numerous local, county, and state jurisdictional boundaries. A UCstructure for incidents in these areas shall be used when practical. The COTP should be consulted relative to action
that may affect the life or safety of personnel, the navigational channel, or create a pollution hazard.

8120 Captain of the Port Responsibility

The USCG renders assistance as available, based on the level of training and the adequacy of equipment. The COTP intends to maintain this traditional “assistance as available” posture without conveying the impression that the USCG is prepared to relieve local fire departments of their responsibilities or compromise their authorities. Paramount in preparing for vessel or waterfront fires is the need to integrate USCG planning and training efforts with those of other response agencies, particularly local fire departments and port authorities. The COTP shall provide appropriate assistance to local municipal fire departments, vessel and facility owners and operators, and other interested parties. The COTP will be prepared to assume the role of IC upon conclusion of firefighting operations if it is appropriate to do so. All USCG firefighting forces and equipment shall remain under the control of their normal chain of command. Orders for the coordination of USCG personnel shall be passed through the USCG COTP or designated representative (Marine Firefighting Coordinator) by the local qualified fire officer. The USCG COTP or designated representative shall be responsible for evaluating the orders of such persons and executing only those orders that will not create unwarranted risk to USCG personnel or equipment.

8130 Vessel Master Responsibility

The master of a vessel or designated representative is responsible for the safety of the crew and vessel and should initiate firefighting response actions in accordance with the vessel’s fire plan. The presence of local fire fighters does not relieve the master of command or transfer the master’s responsibility for overall safety on the vessel. However, the master should not normally countermand any orders given by the local fire fighters in the performance of firefighting activities on board the vessel, unless the intended action clearly endangers the safety of the vessel or crew. As the Master is typically the person most familiar with the vessel in question, then he/she should be integrated into the Unified Command.

8200 Command

Upon activation of this section of the Area Contingency Plan, firefighting resources under the direction of the IC/UC will respond in an appropriate manner to attempt to control and extinguish the fire. Coast Guard assets will be prepared to provide “assistance as available” to the firefighting efforts when appropriate qualified fire service officers are present and able to assume command.

The senior fire service officer present in whose jurisdiction the marine fire occurs will serve as the lead member of the Unified Command. For offshore fires and for vessels underway, the master of the affected vessel, platform supervisor, or another designated
representative of the owner/operator will serve as the Incident Commander or lead member of the Unified Command. The Mobile COTP shall not assume overall control of firefighting efforts when appropriate qualified fire service officers are present and able to assume command.

The command post will be established as soon as practicable at a location determined by the IC/UC.

The IC/UC will determine the primary means of communication.

Command Structure

<table>
<thead>
<tr>
<th>Unified Command</th>
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<tbody>
<tr>
<td>FOSC - USCG</td>
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<tr>
<td>SOSC - As Appropriate</td>
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<tr>
<td>LOSC - Local FD</td>
</tr>
<tr>
<td>RP-OSC - Vessel(s)</td>
</tr>
<tr>
<td>RP-OSC - Facility</td>
</tr>
</tbody>
</table>

8210 Task Organization

In the event of a major shipboard or facility fire, the COTP will request the designation of an IC. The senior fire service person on-scene serves as the IC in the UC for the purpose of responding to the fire and the COTP is responsible for the safety of the waterway and adjacent area.

8220 Multi-Agency Response

In a multi-agency response, a UC structure should be established. This ICS structure should consist of the individuals designated by their respective agencies. The members of the Unified ICS must jointly determine objectives, strategy, and priorities. The determination of which agencies or departments the IC/UC uses may be done on the basis of greatest jurisdictional involvement, number of resources involved, existing statutory authority, or by mutual knowledge of the individual’s qualifications.

A Unified IC structure is called for under the following conditions:

1. More than one department or agency shares management responsibility due to the nature of the incident or the kinds of resources required.

2. The incident involves more than one jurisdiction.

3. The USCG cannot delegate its statutory authorities and will not delegate mission responsibilities to state or local agencies. However, USCG personnel should be prepared to fully integrate into a Unified ICS response structure and provide assistance as necessary.
Cooperation between outside agencies is most essential and must be assured by maintaining a continuous liaison between representatives. The best way to accomplish this is for the COTP to meet with all of the UC representatives at the command post to discuss how the situation will be handled. While each case will present a different set of circumstances, liaison with representatives from some or all of the following groups may be appropriate:

- Fire Department(s)
- U. S. Coast Guard
- Pilots Association
- Master of Vessel
- Legal Counsel
- Chief Engineer
- Chief Mate
- Ship’s Agent
- Owner’s Representative
- Appropriate Port Authority
- Appropriate Facility Managers
- Cargo Representative
- Naval Architect
- Marine Surveyor
- Industrial Hygienist/Toxicologist
- Stevedores
- Appropriate Municipal/County/State Officials

**8240 Federal Response**

USCG and other federal agencies.

**8241 USCG Special Forces**

- National Strike Force
- Marine Safety Center
- Eighth District Support Team
- Eighth District Legal

**8242 Other Federal Agencies**

- Environmental Protection Agency
- Scientific Support Coordinator provided by NOAA
- USN Supervisor Of Salvage (SUPSALV)
- Navy or Army Corps of Engineers vessels operating in the vicinity

**8243 Other Resources**

Any commercial ship becomes a valuable resource during an offshore fire to rescue the burning vessel’s crew should the fire get out of control. Vessels in the area should be notified of a situation via an Urgent Marine Information Broadcast. Tug companies in the vicinity should be contacted and may assist in fighting the fire, moving a dead ship, or transporting personnel and equipment.
8250 State/Local Response

Most local fire departments have limited response capabilities for marine fires. Some local fire departments have small watercraft that can be used for search and rescue and spill response. Offshore ship fires are a rescue priority. Land based fire departments will have involvement at their chief’s discretion as the situation and location dictates.

Local emergency management officials provide response to many different emergencies and serve as a centralized notification point for resources within their local areas.

Law enforcement agencies can assist on-scene to:

- Control crowd,
- Limit access to incident area,
- Provide security for staging areas and/or
- Provide police escort for vehicles carrying firefighting personnel and resources.

8270 Incident Commander Role and Tactical Priorities

The IC will direct the firefighting operations of all responding agencies. Safety of responding emergency personnel shall take priority.

The operational response will be based on the following tactical priorities:

- **Rescue:** The saving of lives and removal of victims to a safe area is paramount and comes before any other consideration.
- **Exposure:** The protection from exposure is necessary to prevent damage to nearby structures, equipment, and materials and to prevent the spread of fire to uninvolved areas (including fuel loads) on or off the vessel. Exposures may be shipboard, shore side, or on a nearby vessel.
- **Confinement:** Confine the fire to the compartment or area of origin.
- **Extinguishment:** Includes those operations that are required to attack and extinguish the main body of fire.
- **Overhaul:** Includes those operations required to complete the extinguishment of remaining fire, prevent re-flash, and to place the compartment and ship in a safe condition.
- **Salvage:** Includes those operations required to protect compartments and contents from preventable damage due to water, smoke, heat, or other elements.
• Ventilation: Includes those operations required to displace a heated and contaminated atmosphere within an involved compartment with normal air from the outside atmosphere

8271 Marine Firefighting Coordinator

The Marine Firefighting Coordinator or senior Coast Guard member of the Marine Firefighting Task Force will serve as the representative of the Mobile Sector Commander to the Incident Commander or Unified Command. He/she will assist in facilitating the response to the marine fire.

8280 Responsible Party Role

The RP, or ship’s master or designee, will maintain control over the vessel, crew, and passengers. The RP will assign a representative to the incident command post. His/her designee should be thoroughly familiar with the ship’s firefighting systems and should understand the ICS.

The command post will be established upon arrival of the local fire department with command and control for all firefighting functions falling within its guidelines. The ship’s firefighting crews will provide strategic assistance to the command post through the RP’s representative.

The RP’s first responsibility will be the evacuation of all nonessential personnel and to ensure accountability is taken of the passengers and crew.

The ship’s firefighting crew will make every effort to contain and extinguish the fire. Before the situation has progressed beyond their capabilities, every effort will then be made to contain the fire and await assistance from the fire department having jurisdiction.

The RP shall deliver the vessel’s Fire Control Plan and manifest to the first arriving firefighting units. Ensure notifications are made to the appropriate agencies.

8281 Vessel Master Role

The master of the vessel will:

• Implement the initial response based on the vessel’s fire control plan.

• Ensure proper communications, both internal and external, and that proper notifications are made to the appropriate fire department or contractor and the USCG. In addition, notify the facility to which the vessel is docked, the port authority, and any nearby vessels.

• Control the operation and use of all shipboard firefighting systems.

• Coordinate the efforts of shipboard fire teams in responding to the fire.
• Conduct a muster of the crew and provide a report to the IC/UC.

• Utilize his/her resources to control the fire until such time as he/she is relieved of firefighting activities by the designated IC.

• Decide if it is necessary to abandon ship. If the crew is ordered to abandon ship, the master will ensure that the proper procedures are carried out.

• Provide the vessel fire control plan and international shore connection to IC/UC.

• Provide a list of crewmembers, the condition of the vessel including status of the fuel and ballast tanks and any other flooding and stability issues, the type and condition of cargoes on board and load plan, and identification of any special equipment hazards, explosions, or damage

8300 Operations

Initial response operations will be the responsibility of the owner/operator of the vessel, platform, or facility. Owners and operators of vessels, platforms, or facilities must develop their own contingency plans to respond to marine fires. Facility owners and operators must take additional steps to limit the spread of fire to or from their facility and any vessels docked nearby.

Local firefighting organizations (municipal, industrial, and contractor) must be prepared to respond within the limits of their training and capabilities. If firefighting resources are not trained or capable of handling a marine fire, they can take appropriate measures to prevent the fire from spreading to nearby exposures.

The U.S. Coast Guard will provide assistance as available. This may include active participation within a Unified Command, establishing safety zones, rerouting or restricting vessel traffic, making marine broadcasts, assistance with search and rescue or medical evacuation, deployment of the Marine Firefighting Coordinator or Marine Firefighting Task Force, or a pollution response. The Mobile COTP will be prepared to continue in the role of Federal On-Scene Coordinator (within the Unified Command) upon conclusion of firefighting operations to oversee salvage operations or pollution responses. Other affected organizations, particularly pollution response or salvage organizations, will respond as directed by the Incident Commander or UC (or the Responsible Party).

The master of the vessel can deny local firefighters access to his vessel. He will then utilize his resources to control and fight the fire. If the U.S. Coast Guard determines that the master’s efforts are inadequate, actions may be taken to ensure a proper response. If the master does request or is required to use professional assistance he is not relieved of command or responsibility for overall safety of the vessel. However, the master should not normally countermand any orders given by the firefighters in the performance of
firefighting activities on board the vessel, unless the action taken or planned clearly endangers the safety of the vessel, crew, or passengers.

### 8310 Tactical Priorities

Operational response will be based on the following tactical priorities:

- Rescue/Life Safety
- Protection of Exposures (facilities, vessels, docks, structures, etc.)
- Containment, Extinguishment, and Property Conservation
- Fire Salvage and Overhaul
- Environmental Protection
- Vessel and Facility Salvage

### 8320 Response Considerations

Firefighting response considerations include:

- Establishment of a command post and appropriate implementation of Unified Command.
- A complete size-up to determine potential for rescue operations and what is burning (class of fire and materials involved).
- Contact appropriate marine firefighting, environmental response, and marine salvage contractors (as necessary by Owner/Operator or COTP if necessary).
- Determination as to whether the fire main system is operating and the location of other firefighting resources on board.
- Obtaining the fire control plan of the vessel, platform, or facility.
- Hose lines taken aboard vessels should be large hose lines (4” to 6”) with reducers for smaller hand lines and sufficient international shore connections (as appropriate).
- Maintaining two separate gangways to the vessel, one for personnel access and the other distinctly to serve as a hose conduit or support. Consider using aerial apparatus or ground ladders for support.
- Determination as to whether the ventilation system is operable. If not, portable equipment may be required.
- Consider need for additional lighting resources to support operations.
- Planning for additional equipment to arrive on scene during early stages of the response. Establish appropriate staging areas for arriving equipment.
• Recognition that a language barrier may exist. The vessel's agent, a vessel's officer, or other interpreter may be required

8330 Employment of Firefighting Resources

The designated Incident Commander or UC will direct employment of responding resources. Firefighting resources will be employed based on:

• Rescue/life safety
• Location and extent of fire;
• Class of fire and cargo involved;
• Potential impact on local community;
• Additional exposure concerns (facilities, vessels, docks, structures, etc.);
• Possibility of explosion;
• Stability of the vessel or platform;
• Hazard to crew or other resources at location
• Weather forecast;
• Maneuverability of vessel;
• Effects on bridges which must be transited; and
• Alternatives if the vessel is not allowed entry to or movement within a port.

The Mobile COTP or Coast Guard Marine Firefighting Coordinator or other representative of the COTP serving within the Operations Section will direct the employment of Coast Guard resources (small boats, helicopters, Coast Guard Strike Team, etc.) in accordance with established policies and the needs of the Incident Commander or Unified Command.

Other responding agencies will report to the Incident Commander or UC for assignment of duties.
See Section 8700 for listing of marine firefighting resources.

8400 Planning

The Incident Commander or UC is responsible for organizing and staffing the Planning Section. It is preferred that these resources are the combined talents of the vessel,
platform, or facility personnel, along with local firefighting resources, contractor personnel, and federal/state agencies.

### 8500 Logistics

Responding agencies and resources will be responsible for their own administrative and logistical support until such time as a Logistics Section is established. The Logistics Section Chief will be appointed by the Incident Commander or Unified Command.

### 8600 Finance/Administration

The owner/operator of the source of fire (facility, vessel, or platform) is responsible for the financial costs associated with marine firefighting. During the initial phases of the fire response, each responding entity would maintain their own cost accounting using their established organizational procedures. In the event of a large incident that extends into a long period of response, a more unified Finance/Administration Section may be established.

A marine fire may lead to the release of harmful quantities of oil or hazardous substances. Dependent on the severity of the fire, the Federal On-Scene Commander can access either the OSLTF or the Superfund (CERCLA) to fund all appropriate measures of response to cleanup, mitigate, or prevent a release into the environment. In the most severe of circumstances, it may be appropriate for the FOSC to fund firefighting resources if the Responsible Party has not taken adequate or appropriate actions. See Section 6000 (Basic Plan) for accessing either the OSLTF or CERCLA funds.

### 8610 Financial Responsibility

If there is not a RP, the USCG can open the OSLTF/CERCLA if there is an oil or hazardous chemical spill or threat of one. If there is a RP and Federal funds are used for response expenses, those expenditures WILL be recovered from the RP. The COTP shall generate a Pollution Removal Authorization for other emergency response organizations that have been requested and utilized.

### 8611 Government Liability

An owner/master, charter, or agent who wishes to enter or move within the port to save a vessel or cargo must indemnify (hold harmless) the port, its board, or federal and local governments for damage or injury suffered as a result of fire or vessel movement during a casualty.

### 8612 Response Cost Considerations

Response funding is available through the OSLTF or CERCLA when a substantial threat of pollution or HAZMAT release to the marine environment exists, in which case commercial resources can be contracted for mitigation.
8700 Marine Firefighting Resources

In addition to local fire departments, commercial organizations with marine firefighting resources include, but are not limited to:

Commercial Resources:

Mobile, AL
Crescent Towing (251) 433-2580 (Located Alabama State Docks)

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length/Speed</th>
<th>Capabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tug Lisa Cooper</td>
<td>92'/12 knots</td>
<td>1 – 4,500 GPM Fire Pump with remote start/stop</td>
</tr>
<tr>
<td>Tug J K Mclean</td>
<td>92'/12 knots</td>
<td>1 – 4,500 GPM Fire Pump with remote start/stop</td>
</tr>
<tr>
<td>Tug Noon Wednesday</td>
<td>75'/10 knots</td>
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Seabulk Towing (251) 432-2611 (Located Alabama State Docks)

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length/Speed</th>
<th>Capabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tug SDM Escambia</td>
<td>90'/13 knots</td>
<td>1 – 3000 GPM Monitor, 2 50’ Hoses with nozzle attachments</td>
</tr>
<tr>
<td>Tug SDM New River</td>
<td>90'/13 knots</td>
<td>1 – 3000 GPM Monitor, 2 50’ Hoses with nozzle attachments</td>
</tr>
<tr>
<td>Tug Sabine</td>
<td>96'/14 knots</td>
<td>2 – 5284 GPM Monitors, 2- 5800 GPM Pumps, 450 GPM Deluge System</td>
</tr>
</tbody>
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Pascagoula, MS
Signet Maritime Towing (228) 762-5700

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length/Speed</th>
<th>Capabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tug Signet Reliance</td>
<td>92.6'/13 knots</td>
<td>FiFi1, 12,500 GPM, Deluge System</td>
</tr>
<tr>
<td>Tug Signet Resolute</td>
<td>81.7'/11 knots</td>
<td>2- Fire Monitors, Fire Pump</td>
</tr>
</tbody>
</table>

Local Resources:

Mobile Fire Department

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length</th>
<th>Capabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phoenix</td>
<td>40’</td>
<td>2- 2000 GPM Hale Pumps, 90 gallons of foam</td>
</tr>
</tbody>
</table>

Orange Beach Fire Department

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length</th>
<th>Capabilities</th>
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</thead>
<tbody>
<tr>
<td>Marine 5</td>
<td>25’</td>
<td>Fire Pump</td>
</tr>
</tbody>
</table>

Pensacola Fire Department

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length</th>
<th>Capabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fireboat 1</td>
<td>36’</td>
<td>2000 GPM Fire Pump</td>
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</table>

Niceville Fire Department

<table>
<thead>
<tr>
<th>Vessel</th>
<th>Length</th>
<th>Capabilities</th>
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<tbody>
<tr>
<td>Vessel</td>
<td>Length</td>
<td>Capabilities</td>
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<tr>
<td>----------</td>
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</tr>
<tr>
<td>Marine 1</td>
<td>27'</td>
<td>Fire Pump with Deck Gun and Manifold</td>
</tr>
<tr>
<td>Marine 421</td>
<td>27'</td>
<td>750 GPM Fire Pump and Deck Gun</td>
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</tbody>
</table>
A substantial spill of oil usually has a RP who is aware the discharge has occurred; i.e., vessel grounding or collision, or a tank or pipeline rupture at a facility. The RP 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 (NRC). Time permitting, the parties are recommended to contact the local Coast Guard Sector or Marine Safety Detachment (MSD). If the discharge occurs within the jurisdiction of a State, then the RP is required to report it to the appropriate State. The numbers below are provided to help facilitate this process.

**National Response Center**  
(800) 424-8802

**USCG Sector Mobile**  
(251) 441-5976

**MSD Panama City**  
(850) 814-8852
### 9110 Initial Assessment Checklist

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<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1.</td>
<td>Name of Responsible Party (Potentially)</td>
</tr>
<tr>
<td>2.</td>
<td>Name of vessel/facility</td>
</tr>
<tr>
<td>3.</td>
<td>Railcar/truck number or other identifying information.</td>
</tr>
<tr>
<td>4.</td>
<td>Type and size of vessel/facility</td>
</tr>
<tr>
<td>5.</td>
<td>Total quantity of fuel on board, or in tank.</td>
</tr>
<tr>
<td>6.</td>
<td>Nationality (vessel only)</td>
</tr>
<tr>
<td>7.</td>
<td>Location of incident (ie. Street address, lat/long, mile marker)</td>
</tr>
<tr>
<td>8.</td>
<td>Date and time of incident (or when discovered)</td>
</tr>
<tr>
<td>9.</td>
<td>Description of spill (ie. Size, color, smell, etc.)</td>
</tr>
<tr>
<td>10.</td>
<td>Type of incident (ie. Explosion, collision, tank failure, grounding, etc.)</td>
</tr>
<tr>
<td>13.</td>
<td>Estimated amount released/discharged.</td>
</tr>
<tr>
<td>14.</td>
<td>Total potential quantity that could be released/discharged (ie. Total quantity in tank or on board)</td>
</tr>
<tr>
<td>15.</td>
<td>Environmental media impacted or potentially impacted by spill (ie. Air, water, ground, soil, etc.)</td>
</tr>
<tr>
<td>17.</td>
<td>Point of contact (ie. Responsible Party name &amp; phone address)</td>
</tr>
<tr>
<td>18.</td>
<td>Vessel/Facility agent(s) (ie. Name and phone number)</td>
</tr>
<tr>
<td>19.</td>
<td>Name and contact information of insurance carrier.</td>
</tr>
<tr>
<td>20.</td>
<td>Number and type of injuries or fatalities.</td>
</tr>
<tr>
<td>21.</td>
<td>Description of who is on-scene and what response activities are being done or have been completed.</td>
</tr>
<tr>
<td>22.</td>
<td>Have evacuations occurred?</td>
</tr>
<tr>
<td>23.</td>
<td>Have any other Agencies been notified?</td>
</tr>
</tbody>
</table>
9200 Personnel and Services Directory

This Section outlines contact information for agencies, departments, contractors, etc. that could assist during an oil or hazardous substance spill/release. Due to the extensive resources, and vast geographic area, present in the USCG Sector Mobile Area of Responsibility (AOR), this Section shall be updated annually.

9210 Federal

<table>
<thead>
<tr>
<th>Unit/Command</th>
<th>24-hr Phone Number</th>
<th>Fax Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sector Mobile</td>
<td>(251) 441-5976</td>
<td>(251) 441-6216</td>
</tr>
<tr>
<td>Station Gulfport</td>
<td>(228) 863-5818</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Station Pascagoula</td>
<td>(228) 769-5600</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Station Dauphin Island</td>
<td>(251) 861-5008</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Station Pensacola</td>
<td>(850) 453-8282</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Station Destin</td>
<td>(850) 244-7147</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Station Panama City</td>
<td>(850) 234-2377</td>
<td>Refer to Sector Mobile.</td>
</tr>
<tr>
<td>Marine Safety Detachment</td>
<td>(850) 814-8852</td>
<td>(850) 814-8851</td>
</tr>
<tr>
<td>Panama City</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gulf Strike Team</td>
<td>(251) 441-6601</td>
<td>N/A</td>
</tr>
<tr>
<td>District Response Advisory Team</td>
<td>(504) 589-6225</td>
<td>N/A</td>
</tr>
<tr>
<td>(DRAT)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>USCG Salvage Engineering</td>
<td>(202) 327-3985</td>
<td>(202) 366-3877</td>
</tr>
<tr>
<td>Response Team (SERT)</td>
<td>(202) 327-3987</td>
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Environmental Protection Agency

<table>
<thead>
<tr>
<th>Department</th>
<th>24-hr Phone Number</th>
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<tbody>
<tr>
<td>Region IV Response &amp; Prevention Branch</td>
<td>1-800-424-8802 (NRC)</td>
<td>(404) 562-8335</td>
</tr>
<tr>
<td></td>
<td>(404) 562-8700</td>
<td></td>
</tr>
<tr>
<td>Leo Francendese – Mobile Area EPA Representative</td>
<td>(404) 606-2223</td>
<td>N/A</td>
</tr>
<tr>
<td>Christ Russell – NW Florida EPA Representative</td>
<td>(850) 274-1575</td>
<td>N/A</td>
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National Oceanic and Atmospheric Administration

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<tr>
<th>Department</th>
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<th>Fax Number</th>
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<tbody>
<tr>
<td>Adam Davis – Scientific Support Coordinator</td>
<td>(206) 549-7759</td>
<td>N/A</td>
</tr>
<tr>
<td>National Marine Fisheries Service – Karen Mitchell</td>
<td>(228) 623-1932</td>
<td>(228) 769-9200</td>
</tr>
<tr>
<td></td>
<td>(228) 549-1623*</td>
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</tr>
<tr>
<td>Response &amp; Restoration</td>
<td>(301) 713-3038</td>
<td>N/A</td>
</tr>
<tr>
<td>NOAA Headquarters</td>
<td>(206) 526-4911</td>
<td>N/A</td>
</tr>
<tr>
<td>National Weather Service</td>
<td>(850) 942-8833</td>
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* Delineates a phone number that is only accessible during normal working hours
### United States Navy

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<tr>
<th>Department</th>
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<tbody>
<tr>
<td>Superintendent of Salvage (SUPSALV)</td>
<td>(202) 781-0534</td>
<td>N/A</td>
</tr>
<tr>
<td>Naval Sea Command</td>
<td>(202) 781-3889</td>
<td>N/A</td>
</tr>
<tr>
<td>Naval Air Station Meridian</td>
<td>(601) 679-2211</td>
<td>N/A</td>
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<tr>
<td>Naval Air Station Pensacola</td>
<td>(850) 452-4785</td>
<td>N/A</td>
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<tr>
<td>Naval Air Station Pensacola</td>
<td>(850) 277-1110</td>
<td>N/A</td>
</tr>
<tr>
<td>Naval Air Station Whiting Field</td>
<td>(850) 623-7011</td>
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### United States Army

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<tbody>
<tr>
<td>Army Corps of Engineers</td>
<td>(251) 690-2495</td>
<td>N/A</td>
</tr>
<tr>
<td>Fort Benning</td>
<td>(706) 545-2011</td>
<td>N/A</td>
</tr>
<tr>
<td>Fort Rucker</td>
<td>(334) 255-2222</td>
<td>N/A</td>
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### United States Air Force

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<tr>
<td>Columbus Air Force Base</td>
<td>(662) 434-7322</td>
<td>N/A</td>
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<tr>
<td>Eglin Air Force Base</td>
<td>(850) 882-1113</td>
<td>N/A</td>
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<tr>
<td>Gunter Air Force Base</td>
<td>(334) 953-7333</td>
<td>N/A</td>
</tr>
<tr>
<td>Keesler Air Force Base</td>
<td>(228) 377-4330</td>
<td>N/A</td>
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<tr>
<td>Maxwell Air Force Base</td>
<td>(334) 953-7333</td>
<td>N/A</td>
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<tr>
<td>Tyndall Air Force Base</td>
<td>(850) 283-1113</td>
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### United States Marine Corps

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<tr>
<td>Logistics Base (Albany, GA)</td>
<td>(229) 639-5000</td>
<td>N/A</td>
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### Agency for Toxic Substance and Diseases (ATSDR)

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<tbody>
<tr>
<td>Center for Disease Control</td>
<td>(404) 498-0120</td>
<td>(404) 639-7107</td>
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### Weapons of Mass Destruction (WMD) Teams

<table>
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</thead>
<tbody>
<tr>
<td>46&lt;sup&gt;th&lt;/sup&gt; Civil Support Team</td>
<td>(334) 213-7753</td>
<td>(334) 271-7421</td>
</tr>
<tr>
<td>Federal Bureau of Investigation</td>
<td>(251) 415-328</td>
<td>(251) 281-7129</td>
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### Customs & Border Protection (CBP)

<table>
<thead>
<tr>
<th>Jurisdiction</th>
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<tbody>
<tr>
<td>Immigrations and Customs Enforcement, Federal Communications Center</td>
<td>(888) 973-2867</td>
</tr>
<tr>
<td>Public Information Office, Gulf Region</td>
<td>(800) 200-4853</td>
</tr>
<tr>
<td>CBP Pascagoula</td>
<td>(228) 761-0041</td>
</tr>
<tr>
<td>CBP Gulfport</td>
<td>(228) 863-6350</td>
</tr>
<tr>
<td>CBP Mobile</td>
<td>(251) 378-7600</td>
</tr>
<tr>
<td>CBP Pensacola</td>
<td>(850) 433-3205</td>
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<tr>
<td>CBP Panama City</td>
<td>(850) 636-6785</td>
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### Department of the Interior

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<tr>
<th>Agency / Jurisdiction</th>
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<tbody>
<tr>
<td>Department of the Interior</td>
<td>(404) 852-5414</td>
</tr>
<tr>
<td>National Park Service</td>
<td>(850) 934-2600</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service Mississippi</td>
<td>(601) 965-4900</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service Alabama</td>
<td>(251) 441-5181</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service Florida</td>
<td>(850) 769-0552</td>
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### Department of Justice, Federal Bureau of Investigation

<table>
<thead>
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<th>Jurisdiction</th>
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<tbody>
<tr>
<td>FBI Pascagoula</td>
<td>(228) 769-7920</td>
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<tr>
<td>FBI Gulfport</td>
<td>(228) 864-6131</td>
</tr>
<tr>
<td>FBI Jackson County</td>
<td>(601) 948-5000</td>
</tr>
<tr>
<td>FBI Mobile</td>
<td>(251) 438-3674</td>
</tr>
<tr>
<td>FBI Mobile</td>
<td>(850) 432-3476</td>
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<tr>
<td><strong>Environmental Response Organizations</strong></td>
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<tr>
<td>----------------------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td><strong>Jurisdiction</strong></td>
<td><strong>Phone Number</strong></td>
</tr>
<tr>
<td>Mississippi Department of Environmental Quality</td>
<td>1-800-222-6362, (601) 961-5171</td>
</tr>
<tr>
<td><em>Mississippi Bureau of Pollution Control</em></td>
<td>(601) 961-5171</td>
</tr>
<tr>
<td>Alabama Department of Environmental Management</td>
<td>(334) 271-7700</td>
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<tr>
<td><em>Alabama Department of Conservation and Natural Resources</em></td>
<td>(334) 242-3486</td>
</tr>
<tr>
<td>Florida Department of Environmental Protection</td>
<td>(850) 595-8300</td>
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<tr>
<td><em>NW Florida Water Management District</em></td>
<td>(850) 539-5999</td>
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<tr>
<th><strong>Emergency Management</strong></th>
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<tr>
<td><strong>Jurisdiction</strong></td>
<td><strong>Phone Number</strong></td>
</tr>
<tr>
<td>Mississippi Emergency Management Agency</td>
<td>(866) 519-6362</td>
</tr>
<tr>
<td>Alabama Emergency Management Agency</td>
<td>(205) 280-2200</td>
</tr>
<tr>
<td>Florida Emergency Management</td>
<td>(850) 413-9969</td>
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<thead>
<tr>
<th><strong>Historic Preservation Office</strong></th>
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<tbody>
<tr>
<td><strong>Agency / Jurisdiction</strong></td>
<td><strong>Phone Number</strong></td>
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<tr>
<td>Mississippi Department of Archives and History</td>
<td>(601) 576-6850</td>
</tr>
<tr>
<td>Alabama State Historic Office</td>
<td>(334) 242-3184</td>
</tr>
<tr>
<td><em>Fort Morgan</em></td>
<td>(251) 540-5257</td>
</tr>
<tr>
<td><em>Fort Mims</em></td>
<td>(251) 533-9024</td>
</tr>
<tr>
<td>Florida Office of Cultural and Historic Programs</td>
<td>(850) 245-6300</td>
</tr>
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<table>
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<tr>
<th><strong>Law Enforcement</strong></th>
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<tbody>
<tr>
<td><strong>Agency / Jurisdiction</strong></td>
<td><strong>Phone Number</strong></td>
</tr>
<tr>
<td>Mississippi State Police</td>
<td>(601) 987-1530</td>
</tr>
<tr>
<td>Mississippi Department of Marine Resources</td>
<td>(228) 374-5000</td>
</tr>
<tr>
<td>Alabama Highway Patrol / Bomb Squad</td>
<td>(251) 660-2300</td>
</tr>
<tr>
<td>Alabama Marine Police</td>
<td>(251) 981-2673</td>
</tr>
<tr>
<td>Florida Fish and Wildlife Conservation Commission</td>
<td>(850) 265-3676</td>
</tr>
<tr>
<td>State Highway Patrol (Pensacola)</td>
<td>(850) 484-5000</td>
</tr>
<tr>
<td>State Highway Patrol (Panama City)</td>
<td>(850) 872-4150</td>
</tr>
</tbody>
</table>
Response personnel are encouraged to utilize local resources during incidents/events; however, local resources such as police, fire, and emergency medical services are easily accessible through 9-1-1 and are not outlined in this portion of the plan.

Contact information for the following local resources/agencies can be found within this Section:

- Emergency Operations Centers
- Environmental Agencies
- Public Health
- Media
- Hazardous Substance Response Teams
- Local Emergency Planning Committees (LEPCs)
- Law Enforcement
- Port Authority / Harbor Master
- Public Health
### Emergency Operations Centers (EOCs)

#### Mississippi

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Phone Number</th>
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</thead>
<tbody>
<tr>
<td>Mississippi State EOC</td>
<td>1-866-519-6362</td>
</tr>
<tr>
<td>Hancock County EOC</td>
<td>(228) 255-0942</td>
</tr>
<tr>
<td>Harrison County EOC</td>
<td>(228) 865-4002</td>
</tr>
<tr>
<td>Jackson County EOC</td>
<td>(228) 769-3111</td>
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#### Alabama

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<tr>
<th>Jurisdiction</th>
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<tbody>
<tr>
<td>Alabama State EOC</td>
<td>1-205-280-2200</td>
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<tr>
<td>Baldwin County EOC</td>
<td>(251) 972-6801</td>
</tr>
<tr>
<td>Mobile County EOC</td>
<td>(251) 460-8000</td>
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#### Florida

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<tr>
<th>Jurisdiction</th>
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<tbody>
<tr>
<td>Florida State EOC</td>
<td>(850) 413-9969</td>
</tr>
<tr>
<td>Escambia County EOC</td>
<td>(850) 471-6409</td>
</tr>
<tr>
<td>Santa Rosa County EOC</td>
<td>(850) 983-5360</td>
</tr>
<tr>
<td>Okaloosa County EOC</td>
<td>(850) 651-7150</td>
</tr>
<tr>
<td>Walton County EOC</td>
<td>(850) 892-8065</td>
</tr>
<tr>
<td>Bay County EOC</td>
<td>(850) 784-4000</td>
</tr>
<tr>
<td>Gulf County EOC</td>
<td>(850) 229-9110</td>
</tr>
<tr>
<td>Franklin County EOC</td>
<td>(850) 653-8977</td>
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<tr>
<td>Wakulla County EOC</td>
<td>(850) 745-7200</td>
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### Mississippi

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<thead>
<tr>
<th>Agency</th>
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<tbody>
<tr>
<td>Gulf Islands National Seashore</td>
<td>(228) 875-9057</td>
</tr>
<tr>
<td>- District Ranger</td>
<td>(228) 875-0823</td>
</tr>
<tr>
<td>- Research Manager</td>
<td>(228) 875-9057</td>
</tr>
<tr>
<td>Nation Marine Services Fisheries</td>
<td>(228) 762-4591</td>
</tr>
<tr>
<td>Grand Bay National Estuarine</td>
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<tr>
<td>Research Reserve</td>
<td>(228) 475-7047</td>
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### Alabama

<table>
<thead>
<tr>
<th>Agency</th>
<th>Phone Number</th>
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</thead>
<tbody>
<tr>
<td>Bon Secour, National Wildlife Refuge</td>
<td>(251) 540-7720</td>
</tr>
<tr>
<td>Dauphin Island Sea Lab</td>
<td>(251) 861-2141</td>
</tr>
<tr>
<td>Weeks Bay National Estuarine Research Reserve</td>
<td>(251) 928-9792</td>
</tr>
<tr>
<td>Mobile Bay National Estuary Program</td>
<td>(251) 431-6409</td>
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### Florida

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<thead>
<tr>
<th>Agency</th>
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<tbody>
<tr>
<td>Gulf Islands National Seashore</td>
<td>(850) 934-2600</td>
</tr>
<tr>
<td>Rocky Bayou State Recreation Area</td>
<td>(850) 833-9144</td>
</tr>
<tr>
<td>Grayton Beach State Park</td>
<td>(850) 267-8300</td>
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## 9230.3 Public Health

### Mississippi

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Phone Number</th>
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</thead>
<tbody>
<tr>
<td>Jackson County Health Department</td>
<td>(541) 664-5035</td>
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### Alabama

<table>
<thead>
<tr>
<th>Jurisdiction</th>
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</tr>
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<tbody>
<tr>
<td>Baldwin County Health Department</td>
<td>(251) 937-6935</td>
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<tr>
<td>Mobile County Health Department</td>
<td>(251) 405-4525</td>
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### Florida

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<th>Jurisdiction</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Okaloosa County Health Department</td>
<td>(850) 689-5755</td>
</tr>
<tr>
<td></td>
<td>(850) 833-9240</td>
</tr>
<tr>
<td>Santa Rosa County Health Department</td>
<td>(850) 983-5275</td>
</tr>
<tr>
<td>Walton County Health Department</td>
<td>(850) 892-8015</td>
</tr>
<tr>
<td>Bay County Health Department</td>
<td>(850) 872-4455</td>
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## 9230.4 Media

### United States Coast Guard

<table>
<thead>
<tr>
<th>Unit/Command</th>
<th>24-hr Phone Number</th>
<th>Fax Number</th>
</tr>
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<tbody>
<tr>
<td>District 8 Public Affairs</td>
<td>(504) 671-2020</td>
<td>(504) 671-2022</td>
</tr>
<tr>
<td>Public Information Assist Team (PIAT)</td>
<td>(252) 331-6000 x3025</td>
<td>(252) 331-6012</td>
</tr>
<tr>
<td>Atlantic Area Public Affairs</td>
<td>(757) 398-6608</td>
<td>(757) 391-8109</td>
</tr>
<tr>
<td>Commandant’s Media Relations Branch</td>
<td>(202) 267-2100</td>
<td>(202) 267-4307</td>
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### Radio Stations

<table>
<thead>
<tr>
<th>Station</th>
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</thead>
<tbody>
<tr>
<td>WGCM</td>
<td>(228) 896-5500</td>
</tr>
<tr>
<td>WKNN</td>
<td>(228) 388-2323</td>
</tr>
<tr>
<td>WAVH</td>
<td>(251) 344-1065</td>
</tr>
<tr>
<td>WBHY</td>
<td>(251) 473-8488</td>
</tr>
<tr>
<td>WKRG</td>
<td>(251) 479-5555</td>
</tr>
<tr>
<td>WTKX</td>
<td>(850) 473-0400</td>
</tr>
<tr>
<td>WCOA</td>
<td>(850) 478-6011</td>
</tr>
<tr>
<td>WTNT</td>
<td>(850) 386-6143</td>
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### Television Stations

<table>
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<tr>
<td>WLOX</td>
<td>(228) 896-1313</td>
</tr>
<tr>
<td>WALA</td>
<td>(251) 434-1010</td>
</tr>
<tr>
<td>WKRG</td>
<td>(251) 479-5555</td>
</tr>
<tr>
<td>WEAR</td>
<td>(850) 456-3333</td>
</tr>
<tr>
<td>WMBB</td>
<td>(850) 769-2313</td>
</tr>
<tr>
<td>WJHG</td>
<td>(850) 230-5221</td>
</tr>
<tr>
<td>WCTV</td>
<td>(850) 893-6666</td>
</tr>
<tr>
<td>WTXL</td>
<td>(850) 893-3127</td>
</tr>
<tr>
<td>WFSU</td>
<td>(850) 487-3170</td>
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### 9230.5 Hazardous Substances Response Teams

#### Mississippi

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<th>Agency / Jurisdiction</th>
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<tbody>
<tr>
<td>Bay St. Louis Fire Department</td>
<td>(228) 467-4736</td>
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<tr>
<td>Biloxi Fire Department</td>
<td>(228) 435-6200</td>
</tr>
<tr>
<td>Gulfport Fire Department</td>
<td>(228) 868-5954</td>
</tr>
<tr>
<td>Mississippi State Police</td>
<td>(228) 539-4881</td>
</tr>
<tr>
<td>Pascagoula Fire Department</td>
<td>(228) 762-3066</td>
</tr>
<tr>
<td>Waveland Fire Department</td>
<td>(228) 467-2042</td>
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#### Alabama

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<tr>
<td>Bay Minnette Fire Department</td>
<td>(251) 580-1617</td>
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<tr>
<td>Bayou La Batre Fire Department</td>
<td>(251) 824-9286</td>
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<tr>
<td>Chickasaw Fire Department</td>
<td>(251) 308-2241</td>
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<tr>
<td>Daphne Fire Department</td>
<td>(251) 621-2836</td>
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<tr>
<td>Fairhope Fire Department</td>
<td>(251) 990-0143</td>
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<tr>
<td>Mobile Fire Department</td>
<td>(251) 208-7351 // (251) 653-0774</td>
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<tr>
<td>Prichard Fire Department</td>
<td>(251) 452-7828</td>
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<tr>
<td>Saraland Fire Department</td>
<td>(251) 679-5506</td>
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<tr>
<td>Satsuma Fire Department</td>
<td>(251) 679-1640</td>
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#### Florida

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<td>Fort Walton Beach Station 7</td>
<td>(850) 833-9572</td>
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<tr>
<td>Gulf Breeze Fire Department</td>
<td>(850) 934-5133</td>
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<tr>
<td>Milton Fire Department</td>
<td>(850) 983-5430</td>
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<tr>
<td>Okaloosa Fire Department</td>
<td>(850) 689-5766</td>
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<tr>
<td>Panama City Fire Department</td>
<td>(850) 872-3053</td>
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<tr>
<td>Pensacola Fire Department</td>
<td>(850) 436-5200</td>
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<tr>
<td>Port St. Joe Fire Department</td>
<td>(850) 227-1115</td>
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### Florida

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<tr>
<td>Valparaiso Fire Department</td>
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<tr>
<td>Tyndall AFB Fire Department</td>
<td>(850) 283-2884</td>
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<tr>
<td>NAS Pensacola Fire Department</td>
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#### 9230.6 Local Emergency Planning Committees (LEPCs)

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### Alabama

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<td>(251) 460-8000</td>
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### Florida

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<tr>
<td>Okaloosa County EOC</td>
<td>(850) 651-7150</td>
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<tr>
<td>Walton County EOC</td>
<td>(850) 892-8065</td>
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<td>Bay County EOC</td>
<td>(850) 784-4000</td>
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<td>Gulf County EOC</td>
<td>(850) 229-9110</td>
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<tr>
<td>Franklin County EOC</td>
<td>(850) 653-8977</td>
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<tr>
<td>Wakulla County EOC</td>
<td>(850) 745-7200</td>
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<tr>
<td>Gulfport/Biloxi Sheriff’s Department</td>
<td>(228) 865-7092</td>
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<tr>
<td>Jackson County Sheriff</td>
<td>(228) 769-3063</td>
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<tr>
<td>Bay St. Louis Police Department</td>
<td>(228) 467-9222</td>
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<tr>
<td>Hancock County Sheriff’s Office</td>
<td>(228) 466-6900</td>
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<td>Waveland Police Department</td>
<td>(228) 467-3669</td>
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**Alabama**

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<tbody>
<tr>
<td>Baldwin County Sheriff</td>
<td>(251) 937-0202</td>
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<tr>
<td>South Emergency Management</td>
<td>(251) 972-6807</td>
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<tr>
<td>North Emergency Management</td>
<td>(251) 937-0317</td>
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<tr>
<td>Eastern Shore Emergency Management</td>
<td>(251) 990-4605</td>
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<td>Mobile County Emergency Management</td>
<td>(251) 460-8000</td>
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<td>Mobile County Sheriff</td>
<td>(251) 574-2423</td>
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<tr>
<td>Bay Minette Police Department</td>
<td>(251) 580-2559</td>
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<tr>
<td>Chickasaw Police Department</td>
<td>(251) 452-0571</td>
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<tr>
<td>Creola Police Department</td>
<td>(251) 675-8145</td>
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<tr>
<td>Daphne Police Department</td>
<td>(251) 621-9100</td>
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<tr>
<td>Fairhope Police Department</td>
<td>(251) 928-2385</td>
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<td>Mobile Police Department</td>
<td>(251) 208-6304</td>
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<td>Prichard Police Department</td>
<td>(251) 452-7900</td>
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<tr>
<td>Saraland Police Department</td>
<td>(251) 675-5331</td>
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<td>Satsuma Police Department</td>
<td>(251) 675-0151</td>
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<td>Wilmer Police Department</td>
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**Florida**

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<td>(850) 436-9620</td>
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<td>Fort Walton Beach Police Department</td>
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<td>(850) 872-3100 // (850) 872-3112</td>
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<td>(850) 747-4700</td>
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<td>(850) 435-1915</td>
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<td>Port St. Joe Police Department</td>
<td>(850) 229-8265</td>
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<tr>
<td>Santa Rosa Sheriff’s Department</td>
<td>(850) 983-1100</td>
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<tr>
<td>Valparaiso Police Department</td>
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## 9230.8 Port Authority/Harbor Master

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<td>MS Port Authority - Operations</td>
<td>(228) 865-4315</td>
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<tr>
<td>Gulfport Pilots Association</td>
<td>(228) 863-6559</td>
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<tr>
<td>Pascagoula Harbormaster</td>
<td>(228) 762-4041</td>
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<tr>
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<tr>
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<td>(251) 441-7200</td>
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<tr>
<td>Mobile Bar Pilots Association</td>
<td>(251) 432-2639</td>
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<td>Pensacola Bar Pilots Association</td>
<td>(850) 224-0219</td>
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<td>Panama City Port Authority</td>
<td>(850) 767-3230</td>
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<tr>
<td>Panama City Harbor/Bar Pilots Association</td>
<td>(850) 785-2524</td>
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<td>Port St. Joe Port Authority</td>
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## 9230.9 Public Health

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<tr>
<td>Jackson County Health Department</td>
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<tr>
<td>Mobile County Health Department</td>
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<td>Mobile County Health Department - PIO</td>
<td>(251) 690-8823</td>
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<tr>
<td>Okaloosa County Health Department</td>
<td>(850) 833-9240</td>
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<tr>
<td>Santa Rosa County Health Department</td>
<td>(850) 983-5200</td>
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<tr>
<td>Walton County Health Department</td>
<td>(850) 982-8015</td>
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<tr>
<td>Bay County Health Department</td>
<td>(850) 872-4455</td>
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9240 Private Resources

The following lists indicate local spill response companies throughout the United States Coast Guard (USCG) Sector Mobile Area of Responsibility (AOR). These lists are not all inclusive, and are intended for reference purposes only. All companies are listed in alphabetical order for their respective area of influence. To request an update to this list, contact USCG Sector Mobile’s Contingency Planning and Force Readiness Department.

Private Resources are outlined on the following pages for the following States:

- Mississippi
- Alabama
- Northwest Florida
- Marine Salvage & Towing
- Divers
- Workboats
<table>
<thead>
<tr>
<th><strong>Mississippi</strong></th>
<th><strong>Company</strong></th>
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<th><strong>Fax Number</strong></th>
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<tbody>
<tr>
<td>B&amp;P Enterprises</td>
<td>Southaven, MS</td>
<td>(662) 781-2780</td>
<td>(662) 781-2867</td>
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<tr>
<td>Clean Gulf Associates</td>
<td>New Orleans, LA</td>
<td>(504) 799-3035</td>
<td>(504) 343-2500</td>
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<tr>
<td>Enhanced Environmental &amp;</td>
<td>Raymond, MS</td>
<td>(601) 897-4595</td>
<td>(844) 333-0939</td>
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<tr>
<td>Emergency Services</td>
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<td>(844) 352-0511</td>
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<tr>
<td>Marine Spill Response Corporation</td>
<td>Pascagoula, MS</td>
<td>(228) 769-9598</td>
<td>1-800-645-7745</td>
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<td>(MSRC)</td>
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<td>1-800-633-8253</td>
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<tr>
<td>Signet Maritime Company</td>
<td>Pascagoula, MS</td>
<td>(228) 762-5700</td>
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<tr>
<td>SWS Environmental Services</td>
<td>Olive Branch, MS</td>
<td>(662) 890-8670</td>
<td>1-877-742-4215</td>
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<tr>
<td>U.S. Environmental Services LLC</td>
<td>Gautier, MS</td>
<td>(228) 396-3866</td>
<td>(228) 396-3836</td>
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<tr>
<td>U.S. Environmental Services LLC</td>
<td>Hernando, MS</td>
<td>(662) 280-3232</td>
<td>(662) 280-3011</td>
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<tr>
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<td>Jackson, MS</td>
<td>(601) 372-3232</td>
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<tr>
<td>Waste Oil Collectors, Inc</td>
<td>Gautier, MS</td>
<td>(228) 497-4585</td>
<td>(228) 497-4140</td>
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<td>(205) 595-8188</td>
<td>(205) 595-8901</td>
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<td>Aaron Oil Company Inc, Mobile, AL</td>
<td>(251) 479-1616</td>
<td>(251) 433-3168</td>
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<td>Action Environmental LLC, Hanceville, AL</td>
<td>(256) 352-2350</td>
<td>(256) 352-2645</td>
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<td>Alexander’s Industrial Services, Phenix City, AL</td>
<td>(334) 855-4775</td>
<td>(334) 408-2643</td>
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<td>BellTech, Orange Beach, AL</td>
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<td>Clean Gulf Associates, New Orleans, LA</td>
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<td>Clean Rite Inc, Saraland, AL</td>
<td>(251) 675-1410</td>
<td>(251) 675-5847</td>
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<tr>
<td>Environmental Safety and Health Consulting Services, Inc (ES&amp;H), Theodore, AL</td>
<td>(251) 653-9978</td>
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<td>HEPACO, LLC, Irontale, AL</td>
<td>(205) 957-2207</td>
<td>(205) 957-2217</td>
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<td>HEPACO, LLC, Theodore, AL</td>
<td>(251) 706-5841</td>
<td>(251) 706-5848</td>
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<td>Oil Recovery Co Inc, Mobile, AL</td>
<td>(251) 690-9010</td>
<td>(251) 433-7681</td>
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<td>Spectrum Environmental Services Inc, Alabaster, AL</td>
<td>(205) 664-2000</td>
<td>(205) 664-2142</td>
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<td>SWS Environmental Services, Decatur, AL</td>
<td>(256) 355-7900</td>
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<td>U.S. Environmental Services LLC, Mobile, AL</td>
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<tr>
<td>U.S. Environmental Services LLC, Alabaster, AL</td>
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### Alabama

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<td>Wildlife Response Services LLC</td>
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### 9240.3 Northwest Florida

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<tbody>
<tr>
<td>Hull’s Environmental Services, Inc</td>
<td>(850) 571-3124, (866) 450-9077</td>
<td>(850) 571-3124</td>
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<td><em>Panama City, FL</em></td>
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<td>SWS Environmental Services</td>
<td>(850) 969-0092, 1-877-742-4215</td>
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<td>(850) 234-8428, (850) 563-0822, 1-877-742-4215</td>
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<td>Wildlife Response Services LLC</td>
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### 9240.4 Marine Salvage & Towing

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<td>Alabama State Docks</td>
<td>(251) 432-2611</td>
<td>N/A</td>
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<tr>
<td><em>Mobile, AL</em></td>
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<tr>
<td>Bender Ship Yard Towing</td>
<td>(251) 438-5240</td>
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<td><em>Alabama</em></td>
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<tr>
<td>Bisso Marine Company</td>
<td>(504) 866-6341</td>
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<td><em>New Orleans, LA</em></td>
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<td>Crescent Towing</td>
<td>(251) 433-2580</td>
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<td>(228) 323-1613</td>
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<tr>
<td>Sea Bulk Towing</td>
<td>(251) 433-2580</td>
<td>N/A</td>
</tr>
<tr>
<td><em>Mobile, AL</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>T&amp;T Marine Salvage</td>
<td>(409) 643-6388, (409) 744-1222</td>
<td>(409) 744-5218</td>
</tr>
<tr>
<td><em>Galveston, TX</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thomas S. Flesner LLC</td>
<td>(281) 744-5729</td>
<td>(281) 345-0339</td>
</tr>
<tr>
<td><em>Houston, TX</em></td>
<td></td>
<td></td>
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<tr>
<td>DON JON-SMIT</td>
<td>(703) 299-0082</td>
<td>N/A</td>
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<tr>
<td><em>Alexandria, VA</em></td>
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### 9240.5 Divers

<table>
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<tr>
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<tr>
<td>Bosarge Diving Inc <em>Pascagoula, MS</em></td>
<td>(228) 762-6361</td>
<td>(228) 762-6361</td>
</tr>
<tr>
<td>Sea Tow <em>Biloxi, MS</em></td>
<td>(228) 374-1092</td>
<td>(228) 872-6149</td>
</tr>
<tr>
<td>Bisso Marine Company <em>New Orleans, LA</em></td>
<td>(504) 866-6341</td>
<td>N/A</td>
</tr>
<tr>
<td>H.J. Merrihue <em>New Orleans, LA</em></td>
<td>(504) 466-2800</td>
<td>(504) 466-9850</td>
</tr>
<tr>
<td>Epic Divers <em>Bell Chase, LA</em></td>
<td>(504) 340-5252</td>
<td>(504) 340-5416</td>
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### 9240.6 Workboats

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<tr>
<td>Biehl &amp; Company</td>
<td>(251) 432-1605</td>
<td>N/A</td>
</tr>
<tr>
<td>Lott Shipping</td>
<td>(251) 433-1621</td>
<td>N/A</td>
</tr>
<tr>
<td>T. Parker Host Inc</td>
<td>(251) 433-1536</td>
<td>N/A</td>
</tr>
<tr>
<td>Star Shipping</td>
<td>(251) 433-3800</td>
<td>N/A</td>
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<tr>
<td>Stiegler Shipping</td>
<td>(251) 639-7300</td>
<td>N/A</td>
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<tr>
<td>Inchcape Shipping Service</td>
<td>(251) 461-2747</td>
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### 9240.7 Dispersants

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<tr>
<td>Airborne Support, Inc.</td>
<td>(985) 851-6391</td>
<td>N/A</td>
</tr>
<tr>
<td>Emergency Aero Dispersant Consortium</td>
<td>(207) 665-2362</td>
<td>N/A</td>
</tr>
<tr>
<td>LOOP, Inc.</td>
<td>(504) 363-9299</td>
<td>N/A</td>
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### 9250 Stakeholders

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<tr>
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<tr>
<td>Agency / Jurisdiction / Company</td>
<td>Phone Number</td>
</tr>
<tr>
<td>Chevron</td>
<td>(228) 938-4600</td>
</tr>
<tr>
<td>First Chemical Corp</td>
<td>(228) 762-0870</td>
</tr>
<tr>
<td>Ingall Ship Building</td>
<td>(228) 935-1122</td>
</tr>
<tr>
<td>Mississippi Phosphates</td>
<td>(228) 762-3210</td>
</tr>
<tr>
<td>Agency / Jurisdiction / Company</td>
<td>Phone Number</td>
</tr>
<tr>
<td>-------------------------------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>Alabama Bulk Terminal</td>
<td>(251) 438-9891</td>
</tr>
<tr>
<td>Alabama Department of Economic &amp; Community Affairs</td>
<td>(334) 242-5100</td>
</tr>
<tr>
<td>BAE Shipyards LLC</td>
<td>(251) 690-7100</td>
</tr>
<tr>
<td>BP Oil</td>
<td>(251) 470-0321</td>
</tr>
<tr>
<td>Evonik/Degussa Corporation</td>
<td>(973) 929-8000</td>
</tr>
<tr>
<td>INEOS Phenol</td>
<td>(251) 443-3115</td>
</tr>
<tr>
<td>Midstream Fuel /Martin Blakely</td>
<td>(251) 439-7248</td>
</tr>
<tr>
<td>Midstream Fuel Services/Martin Theodore</td>
<td>(251) 439-7244</td>
</tr>
<tr>
<td>Mobile State Port Authority</td>
<td>(251) 441-7003</td>
</tr>
<tr>
<td>Occidental Chemical</td>
<td>(251) 452-7620</td>
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<tr>
<td>Olin Chemical Corp.</td>
<td>(251) 944-2231</td>
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<tr>
<td>Radcliff Economy Marine Services</td>
<td>(251) 433-0066</td>
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<tr>
<td>Shell Chemical</td>
<td>(251) 679-7139</td>
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<td>Steigler Shipping</td>
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<table>
<thead>
<tr>
<th>Agency / Jurisdiction / Company</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Murphy Oil</td>
<td>(850) 835-4123</td>
</tr>
<tr>
<td>Citgo</td>
<td>(850) 678-5159</td>
</tr>
<tr>
<td>Amerigas</td>
<td>(850) 769-5165</td>
</tr>
<tr>
<td>Chevron</td>
<td>(850) 785-7426</td>
</tr>
<tr>
<td>TransMontaigne</td>
<td>(850) 432-5133</td>
</tr>
</tbody>
</table>
9300 Draft IAP for WCD Scenario

A draft IAP and IAP components can be accessed through the United States Coast Guard’s Homeport site. These resources are provided as an example, and are not intended to be used as an all-hazards resource for spill response.

The following documents are available for use by response personnel:

- Draft Incident Action Plan
- IAP Cover Sheet
- ICS 202 – Incident Objectives
- ICS 203 – Organization Assignment List
- ICS 204 – Assignment List
- ICS 205 – Radio Communications Plan
- ICS 206 – Medical Plan
- ICS 207 – Organization Chart
- ICS 208 – Site Safety Plan
- ICS 209 – Incident Status Summary
- ICS 214 – Unit Log

9400 Area Planning Documentation

The United States Coast Guard, in coordination with the Sector Area Committee, has developed this ACP based upon an assessment of all potential sources of discharge/release within this Area of Responsibility (AOR). This ACP is intended to be the fundamental element for building confidence that the plan addresses the necessary elements for planning a successful response within the area.

9410 Discharge and Release History

<table>
<thead>
<tr>
<th>Year</th>
<th>NRC Notifications</th>
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<tr>
<td>2012</td>
<td>1485</td>
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<tr>
<td>2013</td>
<td>2023</td>
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<tr>
<td>2014</td>
<td>1883</td>
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<tr>
<td>2015</td>
<td>1145</td>
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<tr>
<td>2016</td>
<td>948</td>
</tr>
<tr>
<td>Total</td>
<td>7484</td>
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</table>

In the 5-year period spanning 2012 – 2016, Sector Mobile continued to receive a high volume of oil spill / hazardous substances release notifications. The vast geographical area covered by USCG Sector Mobile attributes to these high notification numbers; however, in the 4-year period spanning 2013 – 2016 the analysis depicts a strong negative trend in reported discharges/releases within the Area of Responsibility.
9420 Risk Assessment

The Sector Mobile Area of Responsibility (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 National Oceanic and Atmospheric Administration (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. Additionally, a large part of the Mobile coastline consists of the Gulf Islands National Seashore (GINS), 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, refer to the Sector Mobile Geographic Response Plan (GRP).

9430 Planning Assumptions – Background Information

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
- Sensitive Areas
- Response Strategies
- 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 Vessel/Facility Response Plans. These drills may include participation by Federal, State, local agencies, owners and operators of vessels/facilities in the area, and private industry.
9440 Planning Scenarios

As part of the continuous improvement and development of this Area Contingency Plan, the AC is responsible for the planning, and execution, of exercises throughout the Sector Mobile COTP Zone. These scenarios must describe the average, most probable, and worst case discharge(s) as well as the response(s) to those incidents.

9440.1 Worst Case Discharge Scenario

<table>
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<th>No.</th>
<th>Company</th>
<th>OS RP Number</th>
<th>Area</th>
<th>Block</th>
<th>Miles to Shore</th>
<th>Volume (bbls)</th>
<th>County/Parish</th>
<th>County/Parish Highest Risk of Impact</th>
<th>COTP Zone</th>
<th>Lat (Dec Deg)*</th>
<th>Long (Dec Deg)*</th>
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<td>O-521</td>
<td>D</td>
<td>C</td>
<td>57</td>
<td>3</td>
<td>86</td>
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<td>Plaquemines LA</td>
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<td></td>
<td></td>
<td>87.8714 89</td>
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<td>Murphy Exploration &amp; Production Company - USA</td>
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<td>7</td>
<td>LLOG Exploration Offshore, L.L.C.</td>
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<td>89.0461 53</td>
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9440.1.1 Blow-out Prevention

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.
- Stockpile of dispersants available & 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.

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. Additionally, 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.

**9440.1.2 Well Source Control**

The information contained below is a summary intended to provide guidance in the instance of an 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.

**9440.1.3 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.

**9440.1.4 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.

**9440.1.5 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.

9440.1.6 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.

9440.1.7 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.

9440.1.8 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. This organizational structure should follow Incident Command System principals and can be designated a separate command system or fall within an RPs existing Incident Command Structure.

9440.1.9 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 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 is described in the Oil Spill Response Plan. The following discussion will make references to the Plan.

Equipment – HWCG

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<th>Capability</th>
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<tbody>
<tr>
<td>Processing Capability</td>
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<td></td>
<td>70,000 bbls/liquid per day</td>
</tr>
<tr>
<td></td>
<td>95 Million feet³/gas per day</td>
</tr>
<tr>
<td>10k PSI dual ram capping stack</td>
<td>15k PSI dual ram, two outlet capping stack</td>
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</table>

The diagram below shows the equipment supplied by HWCG 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.

Figure 9440-1 HWCG Equipment
Equipment – Marine Well Containment Company

<table>
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</thead>
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</tr>
<tr>
<td></td>
<td>200 Million feet³/gas per day</td>
</tr>
<tr>
<td>15k PSI dual ram capping stack</td>
<td>15k PSI three ram stack</td>
</tr>
</tbody>
</table>

The diagram below shows the equipment supplied by MWCC and the equipment that is the operator’s responsibility.

![Figure 9440-2 MWCC Equipment](image)

Additional information equipment specifications can be found by contacting MWCC at 281-820-8800.

**9440.1.10 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.
Notifications to OSROs, HWCG, 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. Federal personnel will be involved in various roles in the Source Control Team. USCG will act as FOSC-Representative (FOSC-R) 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.
9440.1.11 Deployment

The diagrams below depict a generic deployment scenario for both companies.

**Marine Well Containment Group (MWCC)**

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 on 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 BSEE 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.

**HWCG**

HWCG is a combination of the HWCG Fast Response System (HFRS) and the “common” equipment and services. Seventeen Clean Gulf Associates (CGA) member companies entered into utilization agreements with HWCG 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 HFRS
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.

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.
For MODU operations, the three likely blowout scenarios considered for the Relief Well Plan (RWP) require similar source control equipment. The three blow-out scenarios are:

<table>
<thead>
<tr>
<th>Scenario Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scenario A</strong></td>
</tr>
<tr>
<td>Well blows out, rig sinks with displacement.</td>
</tr>
<tr>
<td><strong>Scenario B</strong></td>
</tr>
<tr>
<td>Well blows out, rig sinks and comes to rest on the well.</td>
</tr>
<tr>
<td><strong>Scenario C</strong></td>
</tr>
<tr>
<td>Well blows out, rig stays afloat and attached to the well.</td>
</tr>
</tbody>
</table>
### 9440.2 Outer Continental Shelf Worst Case Discharge (WCD) Data

<table>
<thead>
<tr>
<th>No.</th>
<th>Company</th>
<th>OSRP Number</th>
<th>Area</th>
<th>Block</th>
<th>Miles to Shore</th>
<th>Volume (bbls)</th>
<th>County/Parish highest Risk of Impact</th>
<th>COTP Zone</th>
<th>Lat (Dec Deg)*</th>
<th>Long (Dec Deg)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Murphy Exploration &amp; Production Company - USA</td>
<td>O-521</td>
<td>DC</td>
<td>573</td>
<td>86</td>
<td>243,495</td>
<td>Plaquemines LA</td>
<td>Sector Mobile</td>
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<td>24</td>
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<td>-89.046153</td>
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</tbody>
</table>
Memorandum of Understanding (MOU)

- **MOU BETWEEN ENVIRONMENTAL PROTECTION AGENCY AND THE UNITED STATES COAST GUARD. Signed 04 January 1982.**
  - This MOU between the U.S. Coast Guard and the Environmental Protection Agency is a Letter of Agreement to provide pre-consultation and concurrence for the authorization of limited use of dispersants and other chemicals on oil spills by pre-designation USCG On-Scene Coordinators.

- **MOU BETWEEN CHIEF OF NAVAL OPERATIONS AND COMMANDANT UNITED STATES COAST GUARD. (SUPSALV).**
  - There is no longer an MOU kept between the NAVY and USCG. The NCP sets guidelines for cooperative assistance between federal agencies, referencing 40 C.F.R. 300.170 and 40 C.F.R. 175 (4)(ii), which states during preparedness planning or in an actual response, various agencies may be called upon in their respective areas of expertise.

- **MOU BETWEEN THE ENVIRONMENTAL PROTECTION AGENCY AND THE UNITED STATES COAST GUARD. Signed 06 September 1979.**
  - This MOU between the U.S. Coast Guard and the Environmental Protection Agency states the agreement between the two services that the responsibility for the mitigation of damage to the public health and welfare caused by the discharge of hazardous substances shall be shared.

- **MOU BETWEEN THE ENVIRONMENTAL PROTECTION AGENCY, UNITED STATES COAST GUARD, AND THE NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION. Signed 18 December 1980.**
  - This MOU between the U.S. Coast Guard, the Environmental Protection Agency, and the National Institute for Occupational Safety and Health Administration provides guidance for the protection of workers who investigate and clean up hazardous waste sites and respond to hazardous substance emergencies.

- **MOU BETWEEN THE DEPARTMENT OF THE INTERIOR AND TRANSPORTATION. Signed 16 August 1971.**
  - In order to ensure the most efficient use of resources under the National Oil and Hazardous Substances Pollution Contingency Plan, the Secretaries of the Department of the Interior and Transportation agree to share responsibilities in reference to Hazardous Substance Release Response.
• MOU BETWEEN THE ENVIRONMENTAL PROTECTION AGENCY AND THE UNITED STATES COAST GUARD. Signed 01 January 1982.
  o The U.S. Coast Guard and the Environmental Protection Agency agree that a mechanism is required to fund USCG costs incurred during emergency response to releases, or the threats of releases of hazardous substances or pollutants or contaminants. This Memorandum of Understanding establishes the accounting, contracting, and fund management control policies and procedures for USCG response actions.

  o The purpose of this agreement is to specify the conditions and procedures under which the U.S. Fish and Wildlife Service will provide the U.S. Coast Guard Federal On-Scene Coordinators with appropriate technical expertise as well as services in support of the Federal Government’s efforts to control and clean up oil and hazardous chemical discharges.

  o Through mutual involvement and commitment, a Coast Guard objective has been set to mobilize the Coast Guard Auxiliary in a dynamic “Team Coast Guard” approach, which actively engages Auxiliarists as “Full Partners” in aggressively promoting marine environmental protection and effectively reducing pollution in our nation’s waterway.

  o This MOU specifies the procedures by which the U.S. Coast Guard can request the U.S. Air Force Reserve to provide aircraft, equipment and personnel for the application of oil dispersants during oil spill clean-up and removal operations and establish interagency cost reimbursement.

  o The MOU states the agreed upon functions for responses to releases from vessels and facilities. Functions related to immediate removal action concerning releases or threats of releases at facilities other than active or inactive “hazardous waste management facilities”.

  o The agreement outlines the efforts of the two agencies to strengthen oil discharge planning, preparedness and response for offshore facilities used for oil and gas drilling, production or related activities occurring on the Outer Continental Shelf.
MOU BETWEEN ENVIRONMENTAL PROTECTION AGENCY REGION 4 AND THE U. S. COAST GUARD FIFTH, SEVENTH, AND EIGHTH DISTRICTS.

- This MOU between the U.S. Coast Guard and the Environmental Protection Agency delineates the Region 4 Inland and Coastal Zone geographical boundaries establishing responsibility for the pre-designation of On-Scene Coordinators for pollution response pursuant to the National Oil and Hazardous Substances Contingency Plan.

9600 Conversions

The tables that follow contain some of the most commonly used formulas and conversions when responding to oil spills or chemical releases. Additional sources include *Handbook of Chemistry and Physics* and *Pocket Reference* (by Thomas Glover).

9610 Estimating Spill Sizes

Sheens

In the below example, a bright rainbow sheen is boomed off in an area 300 yards by 200 yards. The following calculations can be used to estimate the amount spilled.

<table>
<thead>
<tr>
<th>Spill Thickness Conversions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Silvery Sheen</td>
</tr>
<tr>
<td>First Colors</td>
</tr>
<tr>
<td>Bright Rainbow</td>
</tr>
<tr>
<td>Dull Colors</td>
</tr>
<tr>
<td>Dark Colors</td>
</tr>
</tbody>
</table>

\[(Spill 
Thickness) \times (Length 
in Yards) \times (Width 
in Yards)\]

\[.000126 \text{ Gallons / Yard}^2 \times (300 \text{ Yards}) \times (200 \text{ Yards}) = 7.56 \text{ gallons spilled}\]
**Film & Emulsions**

You have just boomed off a spill that is 20 yards wide by 50 yards long. You have a 1/4” amber colored diesel film. This conversion assumes even coating of the spill across the surface of the water and should only be used as estimation.

\[(\text{Spill Thickness}) \times (\text{Length in Inches}) \times (\text{Width in Inches})\]
\[= (.25”) \times (50 \text{ Yards}) \times (20 \text{ Yards})\]
\[= (.25”) \times (1800 \text{ cu”}) \times (720 \text{ cu”}) = 324,000 \text{ cu”}\]
\[324,000 \text{ cu”} \times .004329 = 1402 \text{ gallons spilled}\]
9620 Temperature Conversions

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Celsius</th>
<th>Fahrenheit</th>
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<tr>
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<tr>
<td>105</td>
<td>221</td>
<td></td>
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</tbody>
</table>

9700 List of Response Resources

- Bioremediation Spill Response Plan
- Chemical Hazards Response Information System (CHRIS)
- Emergency Response Guidebook (ERG)
- In-Situ Burn Plan
- Mobile Area Contingency Plan, Geographic Response Plan
- NOAA Alabama Marine Debris Response Plan
- NOAA Florida Marine Debris Response Plan
- NOAA Shoreline Countermeasures
- National Institute for Occupational Safety and Health (NIOSH) Pocket Guide
- United States Coast Guard, Incident Management Handbook
- United States Coast Guard, Incident Command System Forms
- Wireless Information System for Emergency Responders (WISER)