Natural Disaster
Facility/Vessel Oil Discharge Removal
United States Environmental Protection Agency (EPA) Region 6, United States Coast Guard (USCG), Texas General Land Office (TGLO) & Texas Commission on Environmental Quality (TCEQ) Disaster Response Procedures

1.0 Purpose

Oil Discharge Removal Group Purpose: To efficiently document, contain, recover and mitigate oil discharges to minimize impact to the environment. Oil discharges pre-existing the disaster cannot be removed under the Stafford Act mission.

2.0 Objective

Oil Discharge Removal Objective: Physically remove/recover oil as defined by the National Contingency Plan and the Oil Pollution Act of 1990 (OPA 90) at each discharge location. Communication between Group Supervisor and Team Leaders should foster efficient removal operations with minimal impact to the environment and provide situational updates to the Unified Command as required. Any hazardous materials releases as defined by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) will be referred to the Hazard Evaluation Group Supervisor to abate, contain and remove the released hazardous material from the environment. This standard operating procedure (SOP) specifically addresses the release of OPA 90 "Oil" only.

Note: Only federal government representatives may supervise federal contractor personnel and only state government representatives may supervise state contractor personnel.

3.0 Oil Discharge Removal Group Structure

3.1 Oil Discharge Removal Group Supervisor - Responsible Party-Led (RP) Cleanup

3.1.1 To the greatest extent possible, agencies should identify responsible parties that contribute to an oil discharge during a natural disaster. All discharges of oil with identified responsible parties should be monitored by federal or state agencies during a declared disaster. It is appropriate for agencies to utilize Stafford Act funding to cover oversight cost.

3.1.2 The Oil Discharge Removal Group Supervisor (Responsible Party-Led) will work for the Response Branch or similar entity under the Operations Section. The Oil Discharge Removal Group may consist of multiple teams and will be directed by the Group Supervisor. The Group Supervisor will oversee the RP clean up teams and the documentation of operations conducted in the field. The RP-led Clean up Group Supervisor will plan daily field operations for the RP-Led Teams and will ensure that assignments and maps are prepared and made available to the Team Leaders on a daily basis. The Group Supervisor will work directly with the Branch Director and Operations Section Chief on complex field issues such as cleanup end points and in closing out discharges assessed and indentified by Oil Discharge Assessment Teams (ODAT).

3.2 Oil Discharge Removal Group Supervisor – Stafford Act-Led Cleanup

3.2.1 Discharges with no identified responsible parties should be mitigated by federal or state agencies in response to a declared disaster utilizing Stafford Act Funding. CERCLA and OPA funding should only be used for discharges that pre-existed the natural disaster. For those types of discharges, agencies should follow normal procedures for addressing any discharges. Unified Command may elect to track these discharges concurrently with Stafford Act Funded discharges. Before a Stafford Act funded cleanup can occur, all appropriate documentation and procedures shall be followed and approved by the Incident Specific Federal On-Scene Coordinator or Unified Command before action can be taken.

For example: Initiate contact with the responsible party (Notice of Federal Interest). Wait for a pre-determined time period for response from RP. If no response, proceed with Stafford Act funding (e.g. Authorization to Proceed) to mitigate impact to the environment.

NOTE: There may be a delay in when a discharge is observed and an RP is identified. Depending on the size of the discharge, impact or potential impact of the discharge, Unified Command may elect to take proactive steps to mitigate the discharge. This does not prevent Unified Command to then transfer responsibility back to an RP.

3.2.2 The Oil Discharge Removal Group Supervisor (Stafford-Led) will work for the Response Branch or similar entity under the Operations Section. The Oil Discharge Removal Group Supervisor (Stafford-Led Cleanup) should be a qualified FOSCR or SOSC, and the Group may consist of multiple teams and will be directed by the Group Supervisor. The Group Supervisor will provide oversight of all of the Oil Discharge Removal Teams which includes documentation of all operations conducted in the field. The Stafford Act-Led Cleanup Group Supervisor will plan daily field operations for the Stafford Act-Led Teams and will ensure that assignments and maps are prepared and made available to the Team Leaders on a daily basis. The Group Supervisor will work directly with the Branch Director and Operations Section Chief on complex field issues such as cleanup end points and in closing previously documented discharges. Additionally, the Group Supervisor will be responsible for providing all information for SITREPs and POLREPs as required and approved by the Unified Command.

3.3 Oil Discharge Removal Team Composition

Oil Discharge Removal Teams will consist of multiple types of personnel and equipment based on the type of operation to be conducted. It is the Group Supervisor's responsibility to make sure that teams are equipped with the appropriate personnel and equipment. A typical Oil Discharge Removal Team may consist of (1-2) Federal representatives, (1-2) appropriate State representatives, and multiple Oil Discharge Removal Organization (OSRO/BOA/DCO) personnel as required. The Federal representative will serve as the Team Leader and will deliver assignments, provide oversight and interact with the public. The State representative may assist the team in area familiarization, best and prior practices and assist in the documentation of the recovery.

4.0 Oil Discharge Removal Group Procedures and Resources

4.1 Oil Discharge Removal Group Supervisor – (RP-Led & Stafford Act Fund-Led)

The Oil Discharge Removal Group Supervisor (RP-Led & Stafford Act Fund-Led) is in charge of overall field operations for their teams. They need to assist the Oil Discharge Removal Team

Leaders with map requests and with basic planning and implementation of their team's field operations.

4.2 Oil Discharge Removal Team Leaders

4.2.1 RP-Led Cleanup Removal Team Leaders are responsible for the oversight of the recovery operations at a Responsible Party-Led cleanup. Team leaders should make contact with an appropriate representative from the discharge site & enforce pre-determined cleanup endpoints and procedures developed by the Unified Command and signed by all agencies involved. Team Leaders will ensure that the crew has proper personal protection equipment (PPE) and communication capability via cell phone or radio. Team Leaders are to stay in contact with the Group Supervisor for planning purposes and to ensure that the Team Leader has all the necessary assignments, maps, etc., on a daily basis. Team leaders will ensure that the PDA or laptop computer has been synched the morning prior to field use, and the most up-to date maps with correct layers for the correct area, that depict the discharge location(s). Teams that do not have a PDA or laptop computer should utilize printed spreadsheets that provide information about the discharge site. Daily updates of the progress of the cleanup should be documented on PDAs, laptop computers in Response Manager or Hazard Evaluation Field Data Sheets, and ICS-214B NDOW form for progression and situation updates.

4.2.2 Stafford Act Fund-Led Cleanup Team Leaders are responsible for the oversight of the cleanup operations for their team and the OSRO conducting the cleanup. The team leader shall document all equipment and follow all procedures outlined by the National Pollution Fund Center (NPFC) Finance and Resource Management Field Guide (FFARM). Team Leaders will ensure that the cleanup crew has proper PPE, communication capability via cell phone or radio, and access to the appropriate equipment for the planned discharge cleanup tasks scheduled for the day. Team Leaders are to stay in contact with the Group Supervisor to maintain situational awareness and for planning purposes. Team leaders will ensure that the PDA or laptop computer has been synched with Response Manager the morning prior to field use and the most up to date maps with correct layers for the correct area, that depict the discharge cleanup location(s). Teams that do not have a PDA or laptop computer should utilize printed spreadsheets or Hazard Evaluation Field Data Sheets that provide information about the discharge site. Each team will document the progress of the discharge cleanups on a PDA, laptop computer or Hazard Evaluation Field Data Sheets for each discharge assigned. In addition, each team shall submit an ICS-214B NDOW form for overall discharge cleanup progress and situational updates for all activities.

4.3 Oil Discharge Removal Team Documentation

The Oil Discharge Removal Team Leader (RP-Led & Stafford Act Fund-Led) will be in charge of all field documentation for their team. The Team Leader needs to ensure the following:

- If used, all PDAs or laptop computers for field use have been synched appropriately with Response Manager
- Check field kit and replenish with necessary supplies
- Check batteries in GPS unit, camera and any other battery powered equipment
- Attend morning Operations briefing and Health & Safety meeting
- Meet with OSRO assigned to your Removal Team to discuss meeting point and caravan instructions
- Obtain set of maps with discharge locations

- Document removal of oil and closure of locations as specified in Section 5.1 of this SOP in Response Manager via PDA, laptop computer or Hazard Evaluation Field Data Sheet for entry into Response Manager
- Return from field and daily ICS 214B NDOW form (1 per team) documenting recovery activities as described in Section 5.2 of this SOP. Meet with Division/Group/Supervisor to discuss progress for the day, discharged oil recovered, and projected tasks for the following day
- Provide a copy of the ICS 214B NDOW form to the Group Supervisor and to the Documentation Group. Turn in photos to the Documentation Group. Turn in PDA or laptop computer to the IT Group for syncing with Response Manager and recharge

5.0 Procedure for Documenting Closed Targets

5.1 Progress at each discharge site (RP & Federal Fund Led cleanups) will be updated at the conclusion of each work day using the parameters in Response Manager. Once a discharge site has met all cleanup parameters developed by the Unified Command the Team Leader will be responsible closing the target reference identification in Response Manager:

- Look up the specific target reference identification to be closed in Response Manager on the PDA or laptop computer
- Review the status of the discharge site in Response Manager
- Change the site status from "Open" to "Cleanup Completed (Closed)"
- **Save the entry update in Response Manager**
- If the Team Leader does not utilize a PDA or laptop computer with Response Manager, they must still ensure the target reference identification for a discharge is closed in Response Manager. A Hazard Evaluation Field Data Sheet must be completed for the discharge site with the "Cleanup Completed (Closed)" status indicated. The completed Hazard Evaluation Field Data Sheet must be given to the Documentation Unit for entry into Response Manager.

5.2 ICS 214B NDOW Form Documentation Requirements

Each Team Leader is responsible for completing an ICS 214B NDOW form at the end of the field day. The Team Leader is responsible for completing or assigning the completion of the 214B NDOW form. The 214B NDOW form should include essential information so that the Branch Director/Operations Section Chief can have a daily report on the progress of the Oil Removal Group. An example of a properly filled out 214B form is located in the attachments. The 214B NDOW form should include:

- Team members
- Team needs/excess resources
- Out of the ordinary observations
- Any health and safety concerns (e.g. injuries, need for PPE)
- Team accomplishments:
  - Each map grid number/area fully covered including County/City information
  - A summary of the general status of discharge site operations for the day; opened/closed in each grid/area, and special requirements for recovering the items.

- A general overview statement summarizing daily findings and activities to report to the Branch Director/Operation Section Chief.

6.0 Maps

6.1 Requesting Maps:

6.1.1 The Group Supervisor should order maps by 1900 hours each day in order for the GIS Unit to produce the maps by 0600 hours the following day. This is especially important during large responses with a high demand for maps throughout the ICS structure. The Group Supervisor can delegate this ordering process to the Team Leaders.

6.1.2 The GIS Unit is capable of customizing maps to meet the needs of various groups. It is important that the individual requesting the maps effectively communicates which "layers" the maps should show in order to be useful. Suggestions on effective layers follow in Section 6.2 of this SOP.

6.2 Map Layer Requirements:

- EPA GIS map grid overlay – not actual lat/long lines. Grid lines should depict boundaries to the second decimal degree i.e. 33.54 and -101.94 (rather than an actual point such as 33.546172, -101.945739).
- County boundaries
- Bodies of water
- Field teams in both RP and Stafford Act Fund Led Recovery should have 2 sets of maps: large scale (multi-grid navigational overview) maps and small scale (individual grid/quadrant) maps.
- Large scale maps provide a location frame-of-reference for driving directions, while smaller scale grid maps are used to perform thorough assessment.
- Small scale individual grid/quadrant maps should show open discharge locations with associated unique identifying nomenclature ("Discharge/facility Name") written beside each red dot.

6.3 Aerial Recon Over-Flight Maps

Layers on maps utilized in aerial recon should include landmarks such as highways, football fields, treatment plants, and towns – anything that can serve as a useful reference point visible from the air. Two types of maps are necessary for aerial oil discharge assessment, large multi-grid navigational maps and multiple individual grid maps for the flight path. See attachment for example.

6.4 Ground Maps

Layers for maps utilized in ground recon and recovery should include highways, city streets, county/parish boundaries, cities, water bodies, wetland areas. It is important to have layers which show areas not accessible by car and foot such as lakes, canyons, large landfills, and large sections of restricted private property (e.g. gated and guarded industrial facilities).

6.5 Waterway Maps

6.5.1 Layers on maps utilized in water recon and recovery should show layers which allow boat captains to navigate watercraft. Layers showing oyster beds, sandbars, water depth, and boat docks are useful. Waterway maps should have environmental sensitivity layers so that teams can

determine what discharges are located in wetlands, etc. The large scale map should show roadways which provide access to docking and launching locations.

6.5.2 The local Coast Guard and/or General Land Office will have a contingency plan with many helpful navigational reference points.

6.6 Wetland Tactical Map

Oil removal in wetlands or marshes shall be conducted in accordance with the incident specific marsh or wetlands plan. The recovery of oil discharges located within wetland environments require pre-planning. This planning process produces a map Oil Discharge Recovery Teams to use that depict discharges that require cleanup, acceptable access points, and sensitive environments.

7.0 Safety in the Field

All ICPs, Branches/Divisions will have a Safety Officer (SOFR). All health and safety is managed by this officer. The SOFR will be able to provide a Health and Safety Plan (HASP) to ensure safe response work conditions. The SOFR will also have job aids, job safety analyses and hazard analyses documents contained in the HASP and available for all teams. The SOFR may have on-site Assistant Safety Officers (ASOF) from other agencies or contractors that will work together as a team. The SOFR reports directly to the Unified Command. The SOFR can stop operations at any time they deem necessary due to unsafe work conditions or practices.

8.0 Information Sharing

EPA/TGLO/TCEQ will staff agency specific positions within the USCG Incident Command Post before and during a disaster (e.g. Merrell Center ICP during Hurricane IKE). All information, data, maps, reports, photographs or any other information shall be shared with the responding agencies (USEPA, USCG, TCEQ and TGLO). All discharges or releases of oil or hazardous materials will be documented in accordance with these procedures and maintained in the EPA Response Manager Data Management system and shared by all four agencies while responding to a disaster.

ATTACHMENTS:

ICS 214B EXAMPLE

ICS 204 FORM EXAMPLE

GIS MAP REQUEST FORM

AIR OPERATIONS REQUEST FORM

MULTI-GRID NAVIGATIONAL MAP EXAMPLE

INDIVIDUAL GRID/QUADRANT MAP EXAMPLE

HAZARD EVALUATION FIELD DATA SHEET