2023

Eastern Great Lakes Area Contingency Plan

USCG Sector Eastern Great Lakes

LETTER OF APPROVAL

RECORD OF CHANGES			
CHANGE NUMBER	**DATE OF CHANGE**	**DATE ENTERED**	**BY WHO**
001	4 JAN 2017	4 JAN 2017	D. Mergenthaler
002	05 APR 2023	05 APR 2023	D. Mergenthaler

TABLE OF CONTENTS

AREA CONTINGENCY PLANS

The Area Contingency Plans (ACPs) in the Ninth District coordinate response activities and mechanisms to be undertaken during an oil discharge or hazardous substance release. The ACPs minimize confusion for response personnel in emergent situations by presenting information derived through a deliberate planning process, considering, in advance, scenarios likely to occur in the region, with input from appropriate stakeholders. To ensure consistency in preparedness planning, and to allow effective utilization of assets within and between responders and stakeholders, preparedness activities are controlled by a hierarchy of directives.

Development – The ACPs, including Geographic Response Plans (GRPs), were developed to align coordination structures among all levels of government, capabilities and resources into a unified, all-discipline and all-hazards approach to incident management. This concept provides relief from redundant and overlapping emergency response planning requirements faced by Area Committees (ACs). The ACPs development includes extensive coordination with federal, state, and local agencies, nongovernmental organizations (NGOs) and private sector throughout each planning area. The ACPs provide mechanisms for coordination and implementation of a wide variety of incident management and emergency assistance activities. Activation of the ACPs serves to unify and enhance incident management capabilities and resources of individual agencies and organizations, acting under their own authorities, in response to a wide array of potential threats and hazards. This encourages focused tactical planning at the field level. Individual ACPs incorporate best practices from a wide variety of incident management disciplines to include fire, rescue, emergency management, law enforcement, public works and emergency medical services. The collective input received from public and private sector partners has been, and will continue to be, absolutely critical to continued refinement of the ACPs.

Preparedness - Preparedness ensures the local area response system has adequate capability and organization for prompt and effective response (to discharges or substantial threats of discharges of oil and releases of hazardous substances) to minimize adverse impacts. Preparedness is a cornerstone of effective pollution response. Based on identified risks, response resource requirements are identified, plans are developed, and personnel are trained in their roles. ACPs are tested in a variety of exercises and in real time pollution incidents, then revised appropriately based upon lessons learned. Continued efforts to foster partnerships and cooperation among all levels of government, private sector and NGOs remain necessary to ensure that the emergency management community is prepared to respond, and the combined public health, environment and economy remain protected from discharges and releases in the coastal zone of the Great Lakes.

Resource Planning Standard - Ensuring a rapid, efficient mitigation of actual or potential pollution discharges and releases, fulfills the ACPs intent for a coordinated response. It is USCG policy to ensure timely and effective response action is taken to control and remove discharges of oil and releases of hazardous substances, including substantial threats of discharges and releases, into the coastal zone. Initial response is critical since amounts of materials spilled/discharged are often under or misreported. Resources should provide for no greater that a two-hour on scene arrival time at any location within the Area of Responsibility (AOR). This

response time is measured from initial notification until time of arrival on scene, including moderate environmental conditions allowing for safe transit and 30 minutes of preparation time.

Federal On-Scene Coordinators (FOSCs) recognize these resource standards may not be met in all AORs, especially in those that include areas with little or no infrastructure. Proper operational risk assessment and hazard identification will ultimately determine on-scene arrival time.

Additionally, FOSCs will rapidly assess every reported discharge of oil or release of hazardous substances. Based on the geographical size of the zone, resource limitations, and information received in the notification, the FOSC may, as necessary, use capable and credible sources, such as representatives from other federal, state, or local government agencies for initial assessment.

1000 INTRODUCTION

The Eastern Great Lakes Area Contingency Plan (EGLACP) Great describes the strategy for a coordinated federal, state, tribal and local response to a discharge or substantial threat of discharge of oil, or a release or substantial threat of release of hazardous substance(s) within the boundaries of Coastal Zone FOSC. The EGLACP addresses response to an average most probable discharge (AMPD), a maximum most probable discharge (MMPD), and a worst-case discharge (WCD). Planning for these scenarios covers the expected range of spills possible in the coastal zone covered by this EGLACP.

For purposes of this plan, the AMPD is the average spill in the area based on the available historical data. The MMPD is also based on historical spill data and is the discharge most likely to occur taking into account such factors as the size of the largest recorded spill, traffic flow through the area, hazard assessment, risk assessment, seasonal considerations, spill histories and operating records of facilities and vessels in the area.
The WCD from a vessel or facility is the largest foreseeable discharge in adverse weather conditions.

The EGLACP shall be used as a framework for response mechanisms to evaluate shortfalls and weakness in the response structure before an incident, and as a guide for reviewing vessel and facility response plans required by the Oil Pollution Act of 1990 (OPA 90). The review for consistency should address, at a minimum, the economically, environmentally and culturally sensitive areas within the zone, response equipment (quantity and type) available within the zone (this includes federal, state, tribal and local government and industry owned equipment); response personnel available; equipment and personnel needs compared to those available, protection strategies, etc. This plan is written in conjunction with National Oil and Hazardous Substances Contingency Plan (NCP) 40 CFR Part 300 and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA); US EPA CERCLA Overview.

1010 HOW TO USE THE EASTERN GREAT LAKES AREA CONTINGENCY PLAN

The EGLACP is designed along the lines of the National Response Framework (NRF) and contains a base plan supported by incident annexes.

The base plan is designed to be used for every contingency covered in the EGLACP and is supplemented by the appropriate annex.

For example, in the event of a hazardous substance incident both the base plan and the Hazardous Substance Annex should be consulted.

In the event that a hazardous substance incident involved suspected or actual terrorist involvement, the Terrorism Annex would be consulted in addition to the base plan and the Hazardous Substance Annex.

Information contained in the base plan and Annexes is built on the foundation of the Incident Command System (ICS). For example, if you are Incident Commander (IC) for an incident, you would first consult the Incident Commander section of the base plan and then reference the incident specific annex to determine if there are any unique issues that an IC should consider in addition to those listed in the base plan.

Where appropriate, links have been inserted to provide responders with sample documents or other information that may be helpful.

Throughout this document the term "Coast Guard Incident Commander" (CGIC) is used to describe the USCG Officer delegated the following authorities: Captain of the Port (COTP), FOSC, Federal Maritime Security Coordinator (FMSC) or his designee.

1020 MAINTENANCE OF THE EASTERN GREAT LAKES AREA CONTINGENCY PLAN

Maintenance of this plan is the responsibility of the Chief, Emergency Management and Force Readiness (EMFR) at Sector Buffalo. As a living document, review, and updates of the EGLACP ensure accuracy and utility for planning and preparedness. Suggestions and comments about the plan are welcome at any time. Coast Guard Headquarters program administrator, CG-MER, oversees a National Review Panel that systematically reviews ACPs managed at each Sector and provides feedback every 5 years. In that 5-year period, the Sector and its Area Committee are requested to apply the recommendations made from the review. The EGLACP shall be reviewed annually to determine if any changes are necessary. A comprehensive review of ACPs shall be conducted on a quadrennial basis in accordance with the National Preparedness Response Exercise Program (PREP) schedule. Following this review, updated plans shall be submitted to the District Commander for review and approval with documented Records of Change by 01 July. The most current version of the ACP and base plan template will be posted on the Homeport micro site and will not contain sensitive security information (SSI).

1030 AREA CONTINGENCY PLAN PURPOSE

The EGLACP describes the strategy for a coordinated federal, state, tribal and local response to any vessel, offshore facility, submerged pipeline or waterfront facility within the Sector Buffalo, Area of Responsibility that experience:

- A discharge or substantial threat of discharge of oil.
- A release or threat of release of a hazardous substance.
- An exposure to or threat of exposure to a chemical, biological, radiological, nuclear or explosive (CBRNE) event.
- One of the above incidents combined with a threat of an act of terrorism

Discharges, releases or exposure incidents can occur for various reasons and the causes can include human error, mechanical failure, fire, and explosion and/or hostile or terrorist activity.

In the writing of this plan, a number of factors were considered such as:

- Spill histories
- Vessel traffic flow through the area
- Hazard and risk assessments
- Seasonal considerations
- The maximum product capacities and the operating records of facilities and vessels within the area

The EGLACP shall be used as:

- A resource and response guide during actual spills or incidents for orderly and effective response actions in the coastal zone
- A framework for response mechanisms to evaluate shortfalls and weaknesses in the response structure before a spill or incident
- A guide for reviewing vessel and facility response plans required by OPA 90, to ensure consistency

This plan consists of a base plan and incident annexes. The annexes are:

- GRPs
- Hazardous Substance
- Weapons of Mass Destruction (WMD)/CBRNE
- Salvage and Marine Fire Fighting (SMFF)
- Area Maritime Security (AMS)/Terrorism
- Great Lakes Operational Supplement to the Joint Marine Contingency Plan (CANUSLAK)
- Fish and Wildlife (F&W)
- External

1040 DEFINITIONS

The definitions and acronyms utilized throughout this plan are taken from the NCP (40 CFR Part 300.5), CERCLA, OPA 90, or the Clean Water Act (CWA), as amended by OPA 90.

ACTIVATION - Means notification by telephone or other expeditious means to the appropriate state and local officials, or to the regional or district office of participating agencies.

ADVERSE WEATHER - Means the weather conditions that will be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include significant wave height, ice, temperature, weather-related visibility, and currents within the COTP zone in which the systems or equipment are intended to function.

AVERAGE MOST PROBABLE DISCHARGE (facilities) - Means a discharge of the lesser of 50 barrels (BBL) or l percent of the volume of the worst-case discharge.

AVERAGE MOST PROBABLE DISCHARGE (vessels) - Means a discharge of 50 BBLs of oil from the vessel.

COASTAL WATERS - Generally means U.S. waters which are navigable by deep-draft vessels, including the contiguous zone and parts of the high seas to which this plan is applicable, and other waters subject to tidal influence.

CONTIGUOUS ZONE - Means the zone of the high seas, established by the United States under Article 24 of the Convention on the Territorial Sea and Contiguous Zone, which is contiguous to the territorial sea and which extends nine miles seaward from the outer limit of the territorial sea.

DISTRICT RESPONSE GROUP (DRG) – The DRG provides the framework within which the USCG District to organize resources for all-hazard response operations. This framework helps to ensure that all assets residing in the District can be brought to bear in the most efficient manner, to assist the IC in responding to an incident.

DISTRICT RESPONSE ADVISORY TEAM (DRAT) – The DRAT is a readily accessible, deployable team that provides technical and logistical support for the Sector Commanders within the USCG District. Their explicit responsibility is to enhance all- hazard response preparedness for each port within the District, and to provide expertise and technical assistance to the FOSC during oil spills or chemical releases. In addition to this team, there are personnel identified as Expanded DRAT members co-located at the District that bring additional capabilities to bear as needed.

EXCLUSIVE ECONOMIC ZONE (EEZ) - Means the zone contiguous to the territorial sea of the United States extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial sea is measured.

FEDERAL ON-SCENE COORDINATOR (FOSC) – The federal official pre-designated by the U. S. Environmental Protection Agency (USEPA) or the USCG to coordinate responses under subpart D of the NCP (40 CFR 300) or the government official designated to coordinate and direct removal actions under subpart E of the NCP. An FOSC can also be designated as the IC.

INCIDENT MANAGEMENT TEAM (IMT) - A NIMS/ICS compliant overhead organization that can effectively manage an incident by developing and implementing appropriate strategies and tactics to accomplish incident objectives.

INLAND WATER - For the purposes of classifying the size of discharges, means those waters of the United States in the inland zone, waters of the Great Lakes, and specified ports and harbors on inland rivers.

MAJOR DISCHARGE - Means a discharge of more than 10,000 gallons of oil to the inland waters; or a discharge to the coastal waters of more than 100,000 gallons of oil; or a discharge of a hazardous substance that poses a substantial threat to the public health or welfare, or results in critical public concern (40 CFR 117).

MARINE TRANSPORTATION-RELATED FACILITY - Means an onshore facility, including piping and any structure used to transfer oil to or from a vessel, subject to regulation under 33 CFR Part 154 and any deepwater port subject to regulation under 33 CFR Part 150.

MAXIMUM EXTENT PRACTICABLE (facility) - Means the planning values derived from the guidelines for determining and evaluating the required response resources for facility response plans per 33 CFR 154 Appendix C.

MAXIMUM EXTENT PRACTICABLE (vessel) - Means the planning values derived from the guidelines for determining and evaluating the required response resources for plans per 33 CFR 155.1050, 155.1052, 155.1230 or 155.2230, as appropriate.

MAXIMUM MOST PROBABLE DISCHARGE (facility) - Means a discharge of the lesser of 1,200 barrels or 10 percent of the volume of a worst-case discharge.

MAXIMUM MOST PROBABLE DISCHARGE (vessel) - Means a discharge of up to 2,500 barrels of oil for vessels with an oil cargo capacity equal to or greater than 25,000 barrels; or 10% of the vessels oil cargo capacity for vessels with a capacity of less than 25,000 barrels.

MEDIUM DISCHARGE - Means a discharge of 1,000 to 10,000 gallons of oil to the inland waters or a discharge of 10,000 to 100,000 gallons of oil to the coastal waters. A discharge of a hazardous substance equal to or greater than a reportable quantity as defined by regulation (40 CFR 117).

MINOR DISCHARGE - Means a discharge to the inland waters of less than 1,000 gallons of oil; or a discharge to the coastal waters of less than 10,000 gallons of oil; or a discharge of a hazardous substance in a quantity less than that defined as reportable by regulation (40 CFR 117).

NON-PERSISTENT OR GROUP I OIL - Means a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions - At least 50% of which by volume, distill at a temperature of 340 degrees C (645 degrees F); and at least 95% of which by volume, distill at a temperature of 370 degrees C (700 degrees F).

NON-PETROLEUM OIL - Means oil of any kind that is not petroleum based. It includes, but is not limited to, animal and vegetable oils.

PERSISTENT OIL - Means petroleum-based oil that does not meet the distillation criteria for non-persistent oils. For the purposes of this document, persistent oils are further classified based on specific gravity as follows:

- Group II - Specific gravity less than .85 (e.g. gasoline, kerosene, Nigerian Light Crude)
- Group III - Specific gravity between .85 and less than .95 (e.g. Arabian and Kuwait Crude)
- Group IV - Specific gravity between .95 to and including 1.0 (e.g. Bunker C, #6 Fuel Oil)
- Group V - Specific gravity greater than 1.0 (e.g. Carbon Black)

QUALIFIED INDIVIDUAL (QI) - Means an English-speaking representative(s) of the facility identified in the plan, located in the United States, available on a 24-hour basis, familiar with implementation of the facility response plan, and trained in his or her responsibilities under the plan.

RESPONSE RESOURCES - Means the personnel, equipment, supplies, and other capability necessary to perform the response activities identified in a response plan.

SPILL OF NATIONAL SIGNIFICANCE (SONS) - Is defined as a spill which greatly exceeds the response capability at the local and regional levels and which, due to its size, location, and actual or potential for adverse impact on the environment is so complex, it requires extraordinary coordination of federal, state, local and private resources to contain and clean up. Only the Commandant of the Coast Guard or the Administrator of the USEPA can declare a SONS.

SUBSTANTIAL THREAT OF A DISCHARGE (facility) - Means any incident or condition involving a facility that may create a risk of discharge of fuel or cargo oil. Such incidents include, but are not limited to storage tank or piping failures, above ground or underground leaks, fires, explosions, flooding, spills contained within the facility, or other similar occurrences.

SUBSTANTIAL THREAT OF A DISCHARGE (vessel) - Means any incident involving vessels that may create a significant risk of discharge of fuel or cargo oil. Such incidents include, but are not limited to groundings, standings, collisions, hull damage, fire, explosion, flooding, on-deck spills, loss of propulsion, or other similar occurrences.

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

VESSELS CARRYING OIL AS A PRIMARY CARGO - Means all vessels carrying bulk oil cargo that have a Certificate of Inspection issued under 46 CFR Subchapter D (except for dedicated response vessels), Certificate of Compliance, or Tank Vessel Examination Letter.

VESSELS CARRYING OIL AS A SECONDARY CARGO - Means vessels carrying oil pursuant to a permit issued under 46 CFR Subchapter D (30.01-5), 46 CFR Subchapter H (70.0530), or 46 CFR Subchapter I (90.05-35), an International Oil Pollution Prevention (or Noxious Liquid Substance certificate required by 33 CFR 151.33 or 151.35, a dedicated response vessel operating outside a response area, or any uninspected vessel that carries bulk oil cargo.

WORST CASE DISCHARGE (facilities) - Means:

- For facilities with above ground storage, not less than,
  - Loss of the entire capacity of all tank(s) at the facility not having secondary containment; plus
  - Loss of the entire capacity of any single tank within a second containment system; or
  - The combined capacity of the largest group of tanks within the same secondary containment system, whichever is greater.

- For facilities with below-ground storage supplying oil to or receiving oil from the Marine Transportation Related (MTR) portion means:
  - The cumulative volume of all piping carrying oil between the marine transfer manifold and the non-transportation-related portion of the facility. The discharge of each pipe is calculated as follows:
- The maximum time to discover the release from the pipe in hours, plus the maximum time to shut down flow from the pipe in hours (based on historic discharge data or the best estimate in the absence of historic discharge data for the facility) multiplied by the maximum flow rate expressed in BBLs per hour (based on the maximum daily capacity of the pipe) plus the total line marine manifold and the non-transportation related portion of the facility.

WORST CASE DISCHARGE (vessel) - Means a discharge in adverse weather conditions of a vessel's entire oil cargo.

1050 ACRONYMS

AC	Area Committee
ACP	Area Contingency Plan
AMPD	Average Most Probably Discharge
AMS	Area Maritime Security
AMSP	Area Maritime Security Plan
AOBD	Air Operations Branch Director
AOR	Area of Responsibility
ARTES	Alternate Response Tool Evaluation System
ATSDR	Agency for Toxic Substance Disease Registry
AST	Atlantic Strike Team (USCG)
ATP	Authorization to Proceed
AVO	Affiliated Volunteer Organization
BIA	Bureau of Indian Affairs
BOA	Basic Ordering Agreement
BBL	Barrel (42 U. S. gallons)
BSEE	Bureau of Safety and Environmental Enforcement
BWQM	Bureau of Water Quality Management
CANAPS	Ceiling and Number Assignment Processing System
CANUSCENT	Joint U. S./Canadian Inland Contingency Plan (USEPA/Environmental Canada)
CANUSLAK	Canadian/ U.S. Lakes Annex to the Joint Marine Pollution Contingency Plan
CBSA	Canada Border Services Agency
CBRNE	Chemical Biological Radiological Nuclear Explosive
CERCLA	Comprehensive Environmental Response, Compensation & Liabilities Act
CFR	Code of Federal Regulations
CGIC	Coast Guard Incident Commander
CGIS	Coast Guard Investigations Service
CHRIS	Chemical Hazardous Information Response System
CIC	Critical Incident Communications
CLMS	Claims
COFR	Certificate of Financial Responsibility Program
COML	Communication Unit Leader
COMP	Compensation Unit Leader
COST	Cost Unit Leader
COTP	Captain of the Port (USCG)
CPFR	Contingency Planning and Force Readiness
CPN	CERCLA Project Number
CWA	Clean Water Act
DEC	Department of Conservation
DEP	Department of Environmental Protection

DLE	Division of Law Enforcement
DOCL	Documentation Unit Leader
DRAT	District Response Advisory Team
DRG	District Response Group
EGLACP	Eastern Great Lakes Area Contingency Plan
EEI	Essential Elements of Information
EER	Environmental Emergency Response
EEZ	Exclusive Economic Zone
EMICP	Enhanced Mobile Incident Command Post
ENVL	Environmental Unit Leader
EOC	Emergency Operations Center
EPLO	Emergency Preparedness Liaison Officer
EPA	Environmental Protection Agency
ERD	Emergency Response Division
ERPM	Emergency Response Program Manager
ERT	Environmental Response Team (USEPA)
ESA	Endangered Species Act
ESF	Emergency Support Function
ESI	Environmentally Sensitive Index
FAA	Federal Aviation Administration
FBI	Federal Bureau of Investigations
FCC	Federal Communication Center
FCO	Federal Coordinating Officer
FDUL	Food Unit Leader
FEMA	Federal Emergency Management Agency
FIG	Field Intelligence Group
FLAT	Federal Lead Administrative Trustee
FOBS	Field Observers
FOSC	Federal On-Scene Coordinator (USCG)
FMSC	Federal Maritime Security Coordinator
FPN	Federal Project Number
FSC	Finance Section Chief
FWPCA	Federal Water Pollution Control Act
F&W	Fish and Wildlife
GLWQA	Great lakes Water Quality Agreement
GRP	Geographic Response Plan
GSA	General Services Administration
HAZCOM	Hazard Communication Standard
HAZMAT	Hazardous Materials
HPF	Historic Preservation Fund
IAP	Incident Action Plan
IC	Incident Commander

ICS	Incident Command System
AC	Area Command
IGS	Intelligence Group Supervisor
I/I	Intelligence/Investigations
IMT	Incident Management Team
IMAT	Incident Management Action Team
IMH	Incident Management Handbook
IMT	Incident Management Team
INJR	Injury
INTO	Intelligence Officer
IOGS	Investigative Operations Group Supervisor
ISB	In-Situ Burn
ISC	Intelligence Section Chief
JIC	Joint Information Center
JOC	Joint Operations Center
JTTF	Joint Terrorism Task Force
LOFR	Liaison Officer
LOSC	Local On-Scene Coordinator
LSC	Logistics Section Chief
LSS	Laboratory Scientific Support
MA	Mission Assignment
MAC	Multi-Agency Coordination
MPC	Marathon Petroleum Company
MBTA	Migratory Bird Treaty Act of 1918
MCV	Mobile Communications Vehicle
MPAT	106’ Portable Multipurpose Antenna Tower
MSDS	Material Safety Data Sheet
MTSL	Marine Transportation Recovery Unit Leader
MMPA	Marine Mammal Protection Act of 1972
MMPD	Maximum Most Probably Discharge
MOA	Memorandum of Agreement

MSST	Marine Safety and Security Team
MSU	Marine Safety Unit
MTR	Marine Transportation Related
MTS	Marine Transportation System
MTSRU	Marine Transportation System Recovery Unit
NCP	National Contingency Plan
NGO	Nongovernmental Organizations
NHPA	National Historic Preservation Act
NIMS	National Incident Management System
NIOSH	National Institute for Occupational Safety and Health
NMFS	National Marine Fisheries Service
NMSA	National Marine Sanctuaries Act
NOAA	National Oceanographic and Atmospheric Administration
NOFI	Notice of Federal Interest for a Pollution Incident
NOTAM	Notice to Airmen
NPFC	National Pollution Fund Center
NPS	National Park Service
NRC	National Response Center
NRDAR	Natural Resource Damage Assessment and Restoration Program
NRF	National Response Framework
NRP	National Response Plan
NRS	National Response System
NRT	National Response Team
NSF	National Strike Force
NYSDHSES	New York State Division of Homeland Security and Emergency Services
OPA 90	Oil Pollution Act of 1990
ORDM	Ordering Manager
OSC	Operations Section Chief
OSHA	Occupational Safety and Health Administration
OSLTF	Oil Spill Liability Trust Fund
OSRO	Oil Spill Removal Organization
PA	Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan
PEMA	Pennsylvania Emergency Management Agency
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIO	Public Information Officer
PIAT	Public Information Assist Team (USCG)
PREP	National Preparedness for Response Exercise Program
PRFA	Pollution Removal Funding Authorization
PROC	Procurement Unit Leader
PRP	Potentially Responsible Party (CERCLA)

PSC	Planning Section Chief
PSK	Portable SIPRNET Kit
QI	Qualified Individual
QWR	Qualified Wildlife Rehabilitator
RACES	Radio Amateur Civil Emergency Service
RAP	Radiological Assistance Program
RCP	Regional Contingency Plan
RCRA	Resource Conservation and Recovery Act of 1976 RP Responsible Party
RERT	Radiological Emergency
RESL	Resources Unit Leader
RP	Responsible Party
RPM	Remedial Projects Manager
RQ	Reportable Quantity
RRT	Regional Response Team
RSPA	Research and Special Programs Administration
SABR	Site Assessment and Brownfield Revitalization Program
SARA	Superfund Amendments and Reauthorization
SCAT	Shoreline Cleanup Assessment Team
SCO	State Coordinating Officer
SDS	Safety Data Sheet
SHPO	State Historic Preservation Officer
SILC	Shore Infrastructure Logistics Center (USCG)
SITL	Situation Unit Leader
SMART	Specialized Monitoring of Applied Response Technology
SMFF	Salvage and Marine Fire Fighting
SOFR	Safety Officer
SONS	Spill of National Significance
SORS	Spilled Oil Recovery System
SOSC	State On-Scene Coordinator
SPUL	Supply Unit Leader
SSC	Scientific Support Coordinator (NOAA)
SSHO	Site Safety and Health Officer
SSHP	Site Safety and Health Plan
SSI	Sensitive Security Information
STAM	Staging Area
SUBD	Support Branch Director
SUPSALV	Supervisor of Salvage (USN)
SVBD	Service Branch Director
TCC	Transportable Communications Center
THSP	Technical Specialist
TIME	Time Unit Leader
TMACC	Transportable Multi-Agency Communications Center

UAC	Unified Area Command
UC	Unified Command
UCS	Unified Command System
USACOE	U. S. Army Corps of Engineers
USCBP	U. S. Customs and Border Protection
USCG	U. S. Coast Guard
USDA	U. S. Department of Agriculture
USDHHS	U. S. Department of Health and Human Services
USDHS	U. S. Department of Homeland Security
USDOC	U. S. Department of Commerce
USDOE	U. S. Department of Energy
USDOD	U. S. Department of Defense
USDOI	U. S. Department of Interior
USDOJ	U. S. Department of Justice
USDOL	U. S. Department of Labor
USDOS	U. S. Department of State
USDOT	U. S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U. S. Fish and Wildlife Service
USGS	U. S. Geological Survey
USICE	U. S. Immigrations and Customs Enforcement
USN	U. S. Navy
VO	Volunteer Officer
VUL	Volunteer Unit Leader
WCD	Worst Case Discharge
WMD	Weapons of Mass Destruction

1060 CRITICAL INCIDENT COMMUNICATIONS

To ensure that any incident of national interest is rapidly reported to senior levels within the USCG, the CGIC is to use the Critical Incident Communications (CIC) process set forth in COMDTINST 3100.8 (series).

An incident of national interest is presumed when it is conceivable that the Commandant of the USCG or Secretary of the U. S. Department of Homeland Security (USDHS) requires timely knowledge of the incident. Examples include:

- Terrorist attack or suspected terrorist attack
- Attack or apparently significant accident (e.g. explosion, fire, etc.) involving maritime critical infrastructure or key assets
- Sudden incident involving major loss of life or property
- Incident resulting in significant damage to a USCG ship, aircraft, or other high- value equipment (e.g. helicopter crash with probable serious injury or death)
- Receipt of intelligence or not finally evaluated information that the reporting command deems of such importance and time critical nature that it requires the immediate attention of Commandant or higher authority
- Any incident which, in the opinion of the commanding officer or officer-in-charge equates to the above criteria

1060.1 USCG PROCEDURES

The following is an overview (not inclusive) of the procedures to be followed under the CIC Process. The conference call will normally be conducted via a secure conference line.

- Initial Report - The purpose of the conference call is for the unit to make initial notification of the incident. The initial notification will normally be in clear voice (non-secure). Within 5 minutes of becoming aware of an incident the Unit must contact (800) 323-7233 and request a conference call with:
  - District
  - Area
  - USCG Command Center
- Follow-on update - Within 30 minutes of the unit becoming aware of an incident the USCG Command Center will initiate a conference call with:
  - The Unit
  - District Commander
  - Area Commander - Commandant or designee
- The unit will provide:
  - Update on the incident - Initial course of action

- Resource needs (i.e. National Strike Force (NSF), Maritime Safety and Security Team (MSST).

1100 AUTHORITY – ESTABLISHMENT OF AREA COMMITTEES AND AREA CONTINGENCY PLANS

The EGLACP is required by Title IV, Section 4202 of the OPA 90 which amends Subsection (j) of Section 311 of the Federal Water Pollution Control Act (FWPCA) (33 U.S.C. 1321 (j)) as amended by the CWA of 1977 (33 U.S.C. 1251 et seq) to address the development of a national planning and response system.

The EGLACP is also written in accordance with the NCP and the CERCLA, as Amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

As part of this National Planning and Response System, AC's were established for each area designated by the president. Qualified personnel from federal, state, tribal and local agencies comprise the AC. Each AC, under the direction of the FOSC for the area, is responsible for developing their local ACP. Each AC is responsible for working together as a committee including all applicable federal, state, tribal and local officials to complete or include in their ACP Base Plan and Annexes See Section 1010. GRP Components:

- Identification of appropriate procedures for mechanical recovery
- Identification of appropriate procedures for shoreline cleanup
- Identification of environmentally and economically sensitive areas
- Identification of appropriate procedures for protection of sensitive economic and environmental areas
- Identification of appropriate procedures for protection, rescue, and rehabilitation of fisheries and wildlife
- Identification of methods to respond to non-floating oils
- Identification of high-risk hazardous substances including radiological materials within the AOR
- Identification of hazardous substances that can be used as WMD
- Identify and assess local, tribal, state, federal, and industry hazardous substance response capabilities

Executive Order 12777 of 22 October 1991, gave the Commandant of the USCG (through the Secretary of Transportation) for coastal zones and the Administrator of the USEPA for the inland zones, 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.
Title IV of the Homeland Security Act, Section 402 transferred functions of the USCG from the U. S. Department of Transportation (USDOT) to the USDHS.

1110 POLLUTION INVESTIGATION AUTHORITY

Several federal, state, and local agencies have a direct role in the enforcement of applicable laws and regulations associated with a discharge, or substantial threat of a discharge, of oil into the navigable waters of the U.S. The investigation into alleged violations of the many applicable laws and regulations require a coordinated effort among the many agencies involved. As a preliminary step to enhance the effectiveness of investigative activities and limit the potential negative impact of these activities along with the cleanup and removal actions associated with an incident, the following agencies have been identified as having a direct, field-oriented role in the initial stages of these events:

- USCG
- U. S. Department of Energy (USDOE)
- U. S. Department of Defense (USDOD)
- USEPA
- Ohio Environmental Protection Agency (EPA)
- New York Department of Environmental Conservation (DEC)
- Pennsylvania Department of Environmental Protection (DEP)

1200 GEOGRAPHIC BOUNDARIES

The geographic boundaries of each Regional Response Team (RRT) are identified on the map located at https://www.nrt.org/site/regionmap.aspx. Links from this page lead to the Regional Contingency Plan (RCP) for the region.

Ninth Coast Guard District FOSC Boundaries

Four USCG Sectors and one Marine Safety Unit (MSU) provide the FOSC for releases occurring within the Great Lakes coastal zone of Federal Region 2, 3 and 5, each serving a specific geographic area. These geographic areas are defined as the international boundary with Canada, the boundaries between the units (described at 33 CFR 3.45), and the boundary between the inland zone and coastal zone. In most locations, the boundary between inland and coastal zones follows the near shore areas adjoining the Great Lakes and the interconnecting rivers.

Each ACP boundary is detailed in the respective RCP for each of the five units, and details which tributaries fall within the coastal zone and where a geographic feature, such as a highway, serves as the boundary. The inland/coastal boundary can be changed with the concurrence of the District, and the respective USEPA regional branch. [Links to RCPs]

Coastal Zone FOSC ACP Boundaries

OHIO

Northeastern Ohio's coastal zone includes all navigable waters of the United States and contiguous land areas within the following boundaries: from the international boundary in Lake Erie at longitude 082 degrees 25 minutes W; thence due south to Barnes Road and continuing south to the Ohio State Route 2; thence easterly along State Route 2 to Wooster Drive; thence southerly along Wooster Drive to Interstate 90; thence easterly along Interstate 90 to Riverside Drive and then northerly along Riverside Drive and continuing northerly along West Clifton BLVD to State Route 2; easterly along State Route 2 to West 25th Street to Harvard-Denison Road; thence easterly on Harvard- Denison Road to Interstate Route 77; thence northerly on Interstate Route 77 to East 9th Street; continuing northerly on East 9th Street to Route 2; thence easterly on State Route 2 and then easterly on State Route 20 to Ohio/Pennsylvania border; thence northerly along the border to international boundary in lake Erie, thence westerly along the international boundary in Lake Erie back to longitude 082 degree 25 minutes W.

Northeastern Ohio's inland zone includes all waters and contiguous land areas south of the aforementioned boundaries bounded by the borders of Lorain, Cuyahoga, Lake, and Ashtabula Counties.

PENNSYLVANIA

All navigable waters of the United States and contiguous land areas within the following boundaries: From the international boundary: in Lake Erie at longitude 80" 31l2" W. Ohio/Pennsylvania State boundary); thence due south to PA route 5. PA route 5 north and eastward to the Pennsylvania/New York State line.

NEW YORK

All navigable waters of the United States and contiguous land areas within the following boundaries: From the international boundary in Lake Erie at longitude 79" 45' 45" W. (Pennsylvania/New York State boundary); thence due south to NY route 5. Thence north and east along NY route 5 to Interstate 190 North in the city of Buffalo. Continuing north along Interstate 190 to route 266 (River Rd), in the town of Tonawanda. Continuing north along route 266 to 265/384 (River Road), in city of Tonawanda. Continuing north and west along route 265/384 (River Road) to its intersection with the La Salle Expressway in the city of Niagara Falls. Thence west along the La Salle Expressway to the Robert Mosses Parkway in the city of Niagara Falls. Continuing west and north along the Robert Mosses Parkway to route 104, in the town of Lewistown. Thence west along route 104 to route 18F (Lower River Road/Lake Road). Continuing north and east along route 18F to its junction with route 18 in the town of Porter. Continuing east along route 18 to the Intersection with the Lake Ontario Parkway at Lake Side State Park in the town of Kuckville.

Continuing east along the Lake Ontario State Parkway to the Genesee River. Continuing east on Lake Shore Blvd, on the east bank of the Genesee River, to Irondequoit Bay.
Along route 101 Lake Road, on the east bank of Irondequoit Bay, to Sodus Bay. Continuing east along route 104, on the east bank of Sodus Bay, to route 104A in the town of Wolcott. Continuing east along route 104A to route 104 in Oswego. Continuing east along route 104 to the Oswego River. Continuing east on route 1 (North Road) on the east bank of the Oswego River, to route 104B. Continuing east on route 104B east to route 3 in the town of Mexico.
Thence north along route 3 to route 180 at the Dexter Marsh Wildlife Management Area. Continuing north and east on route 180 to route 12E, in the Town of Limerick. Thence north and west along route 12E to the town of Cape Vincent. Thence east along 12E, to French Creek Bay. Continuing east on route 12, on the east bank of French Creek Bay, to route 37 in the town of Morristown. Continuing northeast along route 37 to the town of Hogansville where route 37 crosses the St. Regis River. Thence north along the east bank of the St. Regis River to the St. Lawrence River to the international border with Canada.

The Coastal Zone will include the following waterways inland of the boundary line described above:

Smokes Creek upstream past the confluence of the south and north branches of Smokes Creek to the route 62 bridges over the south and north branches of Smokes Creek, in the town of Lackawanna

The Union Canal, in the city of Buffalo.

The Buffalo River upstream to the confluence with Cazenovia Creek at the Bailey Avenue/Hussey Street bridges in the city of Buffalo.

The U.S. portion of the Niagara River and all of Grand Island.

The Scajaquada Creek upstream to the Grant Street bridge, in the city of Buffalo.

New York State Barge Canal (formerly Erie Barge Canal) and Ellicott Creek. Ellicott Creek upstream to the Young Street/Arterial Highway bridge in the city of North Tonawanda. The New York State Barge Canal eastward to Lock 34 in the town of Lockport.

18 mile Creek upstream to Burt Dam in the town of Burt.

Oak Orchard Creek upstream to the Route 18 Bridge.

Sandy Creek at Sandy Harbor Beach, upstream to route 19 (Lake Road East Fork).

Bradock Bay including the north branch of West Creek upstream to route 261 (Manitou Road).

The Genesee River upstream to its confluence with the New York State Barge Canal at the Interstate 390 Bridge, in the city of Rochester.

All of Irondequoit Bay south to the route 404 bridge, in the city of Rochester.

All of Sodus Bay south to route 104, in the town of Sodus.

The Oswego River south to Lock 8 in the town of Oswego.

The Salmon River upstream to the town of Pulaski.

French Creek Bay upstream to French Creek.

1210 RELATIONSHIP TO OTHER PLANS OR BOUNDARIES

The ACP's are related to and supported by the following other contingency plans:

- NRF
- NCP
- Region 2, 3, & 5 RCP
- CANUSLAK)
- Joint U.S./Canadian Inland Contingency Plan (USEPA/Environment Canada) (CANUSCENT)
- Applicable Facility & Vessel Response Plans that operate in this zone
- Applicable Tribal, State and Local Plans

1300 AREA COMMITTEE

The AC is made up of a group of stakeholders that represent or hold an 'interest' in the Coastal Zone of the Eastern Great Lakes. The focus of the AC is to prepare, exercise and respond with input for the first responders that would address any oil discharge or hazardous substance release in the Coastal Zone. In the Eastern Great Lakes, the committee's actually are broken into 5 separate groups based on regions in the Eastern Great Lakes. These regions are in particular responsible for the tactical plans in their region; GRPs. Each of the GRP subcommittee's also provide input to the base plan or EGLACP. The whole of the five groups together would comprise the AC.

1310 PURPOSE

The AC is a planning and preparedness organization, although individual members may have an oil and hazardous substance response role. The planning role is required by Sections 311(a)(18) and (j)(4) of the CWA, as amended by the OPA 90, which tasks the AC to prepare and submit for approval an ACP, as mandated by Sections 311(a)(19) and (j)(4) of the CWA. The USCG and respective AC members for the coastal zone will coordinate the activities of the AC and assist in the development of a comprehensive ACP that is consistent with the respective RCP and

the NCP. In addition, County Emergency Management Directors will coordinate activities within their respective counties.

1320 ORGANIZATION

The FOSC shall serve as the Chair for their respective AC(s). The Eastern Great Lakes AC will be chaired by the USCG FOSC. Each GRP region or subcommittee will also have a informal Vice-Chair that will always be a representative of the State or of Tribal origin. Acting as Chair of inland zone AC's, precludes the USEPA representative to an AC from serving as Vice-Chair for the coastal zone. If appropriate, the FOSC may designate one or more Vice-Chairs per GRP region. The FOSC will ensure representatives of federal, state, or local agencies or territorial representatives with an interest, or jurisdiction or authority in some capacity for environmental response are invited to participate. Minutes for each meeting will be captured and made available to the public via the USCG Sector Buffalo CPFR.

1330 AREA COMMITTEE MEMBERS

The following is a list of representative agencies, as well as local port stakeholders that could be represented on an AC:

Federal agencies

U. S. Department of Interior (USDOI)
USEPA
Federal Emergency Management Agency (FEMA) National Oceanic and Atmospheric Administration (NOAA)
U.S. Army Corps of Engineers (USACOE)
USCG
U.S. Department of Agriculture (USDA)
USDHS
U.S. Fish and Wildlife Service (USFWS)
U.S. Geological Survey (USGS)
U.S. Department of Labor (DOL)
U.S. Navy (USN) Environment Canada Transport Canada Canadian Coast Guard

State agencies

OHIO
Ohio EPA
Ohio Emergency Management Agency
Ohio Department of Natural Resources-Wildlife
Ohio Department of Natural Resources-Watercraft
Lorain County Emergency Planning Committee

Cuyahoga County Emergency Planning Committee
Lake County Emergency Planning Committee
Ashtabula County Emergency Planning Committee

PENNSYLVANIA
Pennsylvania Emergency Management Agency
Pennsylvania Department of Environmental Protection
Pennsylvania State Police
Pennsylvania State Historic Preservation Office
Pennsylvania Fish and Boating Commission
Erie/Western Pennsylvania Port Authority
Erie County Emergency Planning Committee

NEW YORK
New York State DEC
New York State Homeland Security Emergency Services Office (DHSES)
New York State Police
New York State Health Dept
New York State Parks and Recreation Division
New York State Historic Preservation Office
Chautauqua County Emergency Management
Erie County Emergency Planning Committee
Niagara County Emergency Planning Committee
Orleans County Emergency Planning Committee
Monroe County Emergency Planning Committee
Wayne County Emergency Planning Committee
Cayuga County Emergency Planning Committee
Oswego County Emergency Planning Committee
Jefferson County Emergency Planning Committee
St. Lawrence County Emergency Planning Committee

TRIBAL REPRESENTATIVES
Cayuga Nation
Oneida Indian Nation
Onondaga Nation
Seneca Nation of Indians
St. Regis Mohawk Tribe
Tonawanda Seneca Nation
Tuscarora Nation

1330.1 SUBCOMMITTEES

Area committees establish subcommittees as needed to support preparedness and planning responsibilities. The subcommittee Chair must be an appointed member of the AC. The FOSC can designate members to participate in appropriate subcommittees.

Examples of subcommittees listed below, or others, may be activated when deemed necessary:

- Sub-Committee on Sensitive Area Assessment
- Sub-Committee on Command and Control Issues (ICS/Unified Command System (UCS))
- Sub-Committee on Operational Response
- Sub-Committee on Response Planning
- Sub-Committee on Administration and Exercises
- Subcommittee on Science and Technology
- Subcommittee on Training

1400 NATIONAL AND REGIONAL RESPONSE SYSTEMS

1410 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 tiered response and preparedness mechanism that supports pre-designated FOSC in coordinating national, regional, local government agencies, industry, and responsible party during a response.

Most local agencies that respond to emergencies utilize some form of ICS. Although response to oil spill incidents will be managed through the Unified Command (UC), local agencies will likely utilize internally some form of ICS for interfacing with other local agencies. UC is in fact an element of ICS. They are identical with the exception of designation of the IC. In ICS, one individual, usually the first arriving fire company officer, assumes the role of IC. Due to the expansive scope of large oil spills, a UC is utilized. Here the federal and state Operations Section Chiefs (OSC), the local agency IC, and the Responsible Party's (RP) Incident Manager work together to resolve the incident. The ICS/UC provide a method for different agencies, organizations, and individuals to work together toward a common goal, in an organized, productive, efficient, and effective manner during emergencies. The systems consist of procedures for controlling personnel, facilities, equipment, and communications during all phases of an incident. Both are designed to evolve from the time an incident begins, through initial attack and stabilization, to long-term control, and finally, to resolution of the incident. These systems are adaptable to any type of incident whether fire, explosion, hazardous substances release, or oil spill. Structure can be established and rapidly expanded depending on changing conditions of the incident.

Solving any problem, especially one as complex as a major oil spill is easier to do if broken down into parts. Under these systems the incident organization structure develops in a modular fashion, based on the size of the incident. The incident's staff builds from the top down, and additional sections or functions are added as required by the scope of the incident. One person usually can manage small incidents where larger operations require independent management of various command responsibilities. If the number of divisions and groups exceed the IC's spanof-control, branches can be utilized to further organizationally divide the incident into manageable areas. Divisions and groups can be assigned to various branch directors. ICS allows response agencies to operate with a common, consistent, and pre-established organizational structure and with standard operating procedures. Pre-determined standard names and terminology are used for organizational elements. Plain English is used instead of complicated codes for radio communications. Incident communications are planned, controlled, and managed using a communications network.

1410.1 SPILL OF NATIONAL SIGNIFICANCE (SONS)

A SONS is that rare, catastrophic spill event which captures the nation's attention due to its actual damage or significant potential for adverse environmental impact. 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 of federal, state, tribal, local and private resources to contain and clean up. As per the NCP (40 CFR 300.323), a discharge may be classified as a SONS only by the Administrator of the USEPA for discharges occurring in the inland zone, and only the Commandant of the USCG for discharges occurring in the coastal zone.

The response to a SONS event must be a coordinated response that integrates the FOSCs response organization with the SONS response organization. If a discharge occurs in the coastal zone and is classified as a substantial threat to the public health or welfare of the U. S. (40 CFR 300.320 (a) (2)), or the necessary response effort is so complex that it requires extraordinary coordination of federal, state, tribal, local and private resources to contain and clean up the discharge, the Commandant may classify the incident as a SONS under the NCP.

The NCP describes, in part, the federal government's responsibility for strategic coordination and support of FOSC when responding to a SONS. To meet these responsibilities, the lead agency may establish an ICS Unified Area Command (UAC). Depending on the lead agency, the Commandant of the USCG or the USEPA Administrator may classify a discharge as a SONS. The Commandant or Agency Administrator may name an ICS Area Commander (ICSAC). The ICS AC will establish an Area Command organization. Pursuant to 40 CFR 300.323, the ICS AC will:

- Communicate with affected parties and the public.
- Provide strategic coordination of federal, state, tribal, local and international resources at the national level.

- This strategic coordination will involve, as appropriate, the National Response Team (NRT), the RRT, the Governor(s) of the affected state(s), and the mayor(s) or other chief executive(s) of local government(s). • Coordinate with the senior corporate management of the RP(s).

1420 NATIONAL RESPONSE FRAMEWORK

Domestic incident management and crisis response mechanisms have grown steadily in the last two decades. In 1992, national response planning originated with the Federal Response Plan, which focused on federal roles and responsibilities during a disaster. In 2003, in compliance with Homeland Security Presidential Directive/HSPD-5: Management of Domestic Incidents, the newly established DHS published the National Response Plan (NRP) as the first national plan integrating all levels of government, the private sector, and NGOs into a common incident management framework. In 2008, the NRF, which superseded the NRP, was developed to incorporate lessons learned after Hurricane Katrina. With the continued maturation of the NRF and the requirements set forth in the 2011 Presidential Policy Directive /PPD-8: National Preparedness, the mandate for integrated whole community plans across five mission areas - Prevention, Protection, Mitigation, Response, and Recovery - is stronger.

The NRF is a guide to how the Nation conducts all-hazards response. It is built upon scalable, flexible, and adaptable coordinating structures to align key roles and responsibilities across the Nation. The NRF presents the guiding principles that enable all response partners to prepare for and provide a unified national response to disasters and emergencies – from the smallest incident to the largest catastrophe. The NRF defines the key principles, roles, and structures that organize the way we respond as a Nation. It describes how communities, tribes, states, the federal government, and private sector and non-governmental partners apply these principles for a coordinated, effective national response. The NRF is always in effect, and elements can be implemented at any level at any time.

The NRF also includes Incident Annexes that address specific categories of contingencies or hazard situations requiring specialized application of NRF mechanisms. The Incident Annexes are available in the National Preparedness Resource Library. Details relating to requesting and receiving assistance, as well as the authorities under which assistance is provided, are available on the NRF Resource Center. Response Partner Guides, information on Stafford Act and nonStafford Act assistance, all annexes, and a listing of legal authorities are available on the Web site.

1430 NATIONAL RESPONSE TEAM ROLE IN INCIDENT RESPONSE

The NRT's membership consists of fifteen federal agencies with responsibilities, interests, and expertise in various aspects of emergency response to pollution incidents. The USEPA serves as chair; and the USCG serves as Vice-Chair, except when activated for a specific incident. 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 as requested by an FOSC via an RRT during an incident. NRT assistance usually takes the form of

technical advice, access to additional resources/equipment, or coordination with other RRTs. The following is a list of NRT members and their functions:

Environmental Protection Agency (USEPA):
The USEPA chairs the NRT, co-chairs the standing RRT's, provides pre-designated FOSCs for the inland zone, provides Remedial Projects Managers (RPM's) for remedial actions, and generally provides Scientific Support Coordinators for the inland zone. The USEPA provides expertise on environmental effects of releases and on environmental pollution control techniques. The USEPA provides legal expertise on the interpretation of CERCLA and other environmental statutes. The USEPA may enter into a contract or cooperative agreement with the appropriate state to implement response actions.

United States Coast Guard (USCG):
The USCG provides pre-designated FOSCs for the coastal zone, co-chairs the standing RRT's, and serves as the NRT vice-chair. The USCG staffs and administers the National Response Center (NRC); maintains continuously-manned facilities that can be used for command, control, and surveillance of releases in coastal waters; and serves as fund manager for the oil spill liability trust fund (OSLTF). The USCG's NSF is especially trained and equipped to respond to major pollution incidents. In water pollution incidents, in which the USCG has financial responsibility jurisdiction, the USCG ensures the responsible parties, both U.S. and foreign, are able to compensate the U.S. and other impacted parties through the Certificate of Financial Responsibility Program (COFR).

Federal Emergency Management Agency (FEMA):
FEMA provides guidance, policy, and program advice, and technical assistance in hazardous materials and radiological emergency preparedness activities (planning, training, and exercising) to state and local governments. During responses, FEMA provides advice and assistance to the lead agency on coordinating relocation assistance and mitigation efforts with other federal agencies, state, and local governments, and the private sector. FEMA may enter into an agreement with the appropriate political entity to implement relocation assistance during responses.

Department of Defense (DOD):
The DOD must take all action necessary with regard to releases of oil or hazardous substances where the release is on, or the site source of the release is from, a facility or vessel under jurisdiction, custody, or control of the DOD. The DOD may also, consistent with its operational requirements and at the request of the FOSC, provide locally deployed USN oil spill equipment and provide response assistance to other federal agencies upon request. The USN also has an extensive array of specialized equipment and personnel available for use in ship salvage, shipboard damage control, and diving. The USACE has specialized equipment and personnel for removing navigation obstructions and accomplishing structural repairs.

Department of Energy (DOE):
Except as otherwise provided in Executive Order 12580, the USDOE provides FOSC/ RPMs that are responsible for taking all response actions with respect to releases of hazardous substances

where either the release is on, or the sole source of the release is from, any facility or vessel under its jurisdiction, custody, or control. In addition, under the NRF, the USDOE provides advice and assistance to other FOSC/RPMs for emergency actions essential for the control of immediate radiological hazards.

Department of Agriculture (USDA):
The USDA has scientific and technical capability to measure, evaluate, and monitor, either on the ground or by use of aircraft, situations where natural resources including soil, water, wildlife, and vegetation have been impacted by oil or hazardous substances. The USDA may be contacted through Forest Service emergency staff officers who are the designated members of the RRT. Agencies within USDA with relevant expertise are: The Forest Service, the Agriculture Research Service, the Soil Conservation Service, the Food Safety and Inspection Service, and the Animal and Plant Health Inspection Service.

Department of Commerce (USDOC):
Through the NOAA, the USDOC provides scientific support for responses and contingency planning in coastal and marine areas, including assessments of the hazards that may be involved, predictions of movement and dispersion of oil and hazardous substances through trajectory modeling, and information on the sensitivity of coastal environments to oil or hazardous substances. NOAA provides scientific expertise on living marine resources it manages and protects. It also provides information on actual and predicted meteorological, hydrologic, ice, and oceanographic conditions for marine, coastal, and inland waters, as well as, tide and circulation data.

Department of Health and Human Services (USDHHS):
The USDHHS is responsible for providing assistance on matters related to the assessment of health hazards at a response and protection of both response workers and the public's health. The USDHHS is delegated authorities under CERCLA relating to a determination that illness, disease, or complaints may be attributable to exposure to a hazardous substance, pollutant, or contaminant. Agencies within USDHHS that have relevant responsibilities, capabilities, and expertise are the Agency for Toxic Substances and Disease Registry and the National Institutes for Environmental Health Sciences.

Department of the Interior (USDOI):
The USDOI has expertise on and jurisdiction over a wide variety of natural resources and federal lands and waters as well as certain responsibilities for Native Americans and U. S. Territories. The USDOI may be contacted through Regional Environmental Officers, who are the designated members of RRTs. Bureaus and offices with relevant expertise are: USFWS, USGS, Bureau of Indian Affairs, Bureau of Land Management, Minerals Management Service, National Park Service (NPS), Bureau of Reclamation, Office of Surface Mining and Reclamation Enforcement, and Office of Insular Affairs.

Department of Justice (USDOJ):

The USDOJ provides expert advice on complicated legal questions arising from discharges or releases, and federal agency responses. In addition, the USDOJ represents the federal government, including its agencies, in litigation relating to such discharges or releases.

Department of Labor (USDOL):
The Occupational Safety and Health Administration (OSHA) and the state operating plans approved under the Occupational Safety and Health Act of 1970, have authority to conduct safety and health inspections of hazardous waste sites to assure that employees are being protected and to determine if the site is in compliance with safety and health standards and regulations. On request, OSHA will provide advice and assistance regarding hazards to persons engaged in response activities.

Department of Transportation (USDOT):
The USDOT provides response expertise pertaining to transportation of oil or hazardous substances by all modes of transportation. Through the Research and Special Programs Administration (RSPA), USDOT offers expertise in the requirements for packaging, handling, and transporting regulated hazardous materials. RSPA promulgates and enforces the Hazardous Materials Regulations. RSPA provides technical assistance in the form of Emergency Response Guidebooks and, in a joint effort with FEMA, has developed Hazardous Material Information Exchange. RSPA also provides planning support in the development of protective action decision strategies and exercise scenarios.

Department of State (USDOS):
The USDOS takes the lead in the development of international joint contingency plans. It also helps to coordinate an international response when discharges or releases cross international boundaries or involve foreign flag vessels. Additionally, USDOS coordinates requests for assistance from foreign governments and U.S. proposals for conducting research at incidents that occur in waters of other countries.

Nuclear Regulatory Commission:
The Commission responds, as appropriate, to releases of radioactive materials by its licensees, in accordance with the Nuclear Regulatory Commission Incident Response Plan (NUREG-0728). In addition, the Commission will provide advice to the FOSC/ RPM when assistance is required in identifying the source and character of other hazardous substances releases where the commission has licensing authority for activities utilizing radioactive materials.

General Services Administration (GSA)
GSA is responsible for carrying out the policy and regulatory functions assigned to it by Congress, as one of the central management agencies of the federal government. GSA collaborates with customer agencies and stakeholders to develop policies for the implementation of federal laws, executive orders and other executive branch guidance.

1430.1 REGIONAL RESPONSE TEAM ROLE IN INCIDENT RESPONSE

The RRT (consisting of a representative from each state in the region and representatives from 15 federal agencies) acts as a regional body responsible for regional planning and coordination of preparedness and response actions involving oil and hazardous substances. The RRT coordinates assistance and advice to the FOSC in the event of a major or substantial spill.

It is the policy of the RRT that response actions on non-federal lands should be monitored or implemented by the most immediate level of government with authority and capability to conduct such activities. The first level of response will generally be the responsible party (RP), followed by local government agencies, and followed by state agencies when local capabilities are exceeded. When incident response is beyond the capability of the state response, USEPA or USCG is authorized to take response measures deemed necessary to protect public health or welfare or the environment from discharges of oil or releases of hazardous substances, pollutants, or contaminants. The need for federal response is based on evaluation by the FOSC.

1430.2 CANUSLAK AND THE CROSSBORDER CONTINGENCY PLAN

Link to CANUSLAK Annex

The Great Lakes Water Quality Agreement (GLWQA), first signed in 1972, and renewed in 1978 and 1980, with an ongoing rewrite occurring now, expresses the commitment of Canada and the United States, to restore and maintain the chemical, physical and biological integrity of the Great Lakes Basin Ecosystem, and includes a number of objectives and guidelines to achieve these goals. New annexes to the GLWQA address atmospheric deposition of toxic pollutants, contaminated sediments, groundwater, and non-point sources of pollution. Annexes are also added to incorporate the development and implementation of remedial action plans for Areas of Concern and lake-wide management plans to control critical pollutants. Article six of the GLWQA, entitled Joint Contingency Plan, states:

Annex one of the CANUSLAK, as mentioned or reviewed, shall be maintained in force for the Great Lakes. The USCG and the Canadian Coast Guard shall, in cooperation with other affected parties, identify and provide detailed Supplements for areas of high risk and of particular concern in augmentation of CANUSLAK. It shall be the responsibility of the USCG and the Canadian Coast Guard to coordinate and to maintain the Plan and the Supplements appended thereto.

The purpose of the Plan is to provide for coordinated and integrated response to pollution incidents in the Great Lakes System by responsible federal, state, provincial and local agencies. The Plan supplements the national, provincial and regional plans of the parties.

The Plan was developed to facilitate quick response to incidents involving both the U. S. and Canada. The plan supports the movement of resources to support incident response activities. In case of a pollution/marine incident related emergency or exercise that may occur in the U.S. or Canada, which would require emergency assistance from the U.S./ Canadian Coast Guards or agencies/contractors working in conjunction with the U.S./ Canadian Coast Guard, a call from the appropriate USCG will be made notifying the following:

- U.S. Customs and Border Protection (USCBP)
- Canada Border Services Agency (CBSA)
- U.S. Immigrations and Customs Enforcement (USICE)
- Citizenship and Immigration Canada

These notifications are designed to facilitate the expeditious movement of personnel and/or equipment across the U.S./Canada border when responding to marine related emergencies or during exercises and drills that assist agencies in preparing for marine emergencies.

1440 INCIDENT MANAGEMENT

The NIMS and the NRF are two fundamental documents, which form the basis of a comprehensive, integrated approach to domestic incident management. The use of NIMS and NRF is mandated by both law and Presidential policy for all domestic responses. These key documents assign roles and responsibilities and guide interagency response coordination and operations. In addition to NIMS and NRF, there are other documents that may guide responses to specific types of incidents.

The Contingency Preparedness Planning Manual, Volume 4: Incident Management and Crisis Response, COMDTINST M3010.24 describes the USCG connectivity to NIMS and the NRF. It mandates specific preparedness and response management activities within the USCG to ensure connectivity with all levels of interagency governance during disaster preparedness and response activities.

1440.1 NATIONAL INCIDENT MANAGEMENT SYSTEM

The NIMS is a systematic, inclusive approach to guide departments and agencies at all levels of government, NGO, and the private sector for working together seamlessly and assimilating divergent capabilities, cultures, and objectives for incidents spanning all hazards - regardless of cause, size, location, or complexity - in order to reduce loss of life, harm to the environment, and loss of property. The NIMS is guided by four principles that establish the fundamental basis for influencing incident management practice in the U. S. and promoting a universal culture for managing emergencies. Each principle provides a clear and consistent lens through which to understand and use NIMS while also framing the ongoing implementation of NIMS across jurisdictions and organizations. These principles are: Universal Applicability, Standardization, Scalability, Flexibility, Adaptability, and Unity of Effort.

1440.2 INCIDENT COMMAND SYSTEM (ICS)

The ICS is a fundamental element of incident management. The use of the ICS provides standardization through the following 14 management characteristics, each of which contributes to the strength and efficiency of the overall system:

1. Common Terminology
2. Modular Organization

3. Management by Objectives
4. Incident Action Planning
5. Manageable Span of Control
6. Incident Facilities and Locations
7. Comprehensive Resource Management
8. Integrated Communications
9. Establishment and Transfer of Command
10. Chain of Command and Unity of Command
11. Unified Command
12. Accountability
13. Dispatch/Deployment
14. Information and Intelligence

Like other portions of the NIMS, the ICS is a flexible, scalable, and adaptable management approach to meet the needs of any incident. The ICS, therefore, provides a core mechanism for coordinated and collaborative incident management, allowing it to address a broad spectrum of incidents from small to complex, planned and unplanned, and both natural and human-caused.

A principle ICS reference is the: Incident Management Handbook (IMH), although multiple agencies have ICS guides available for use. The IMH is an excellent reference to keep and use during a response. In addition, see Section 2000 for more guidance on ICS and UC issues. The Coast Guard has also developed the USCG IMH "app" for use on both IOS and Droid "smart phones".

1450 AREA EXERCISE MECHANISM

The opportunity to exercise this plan and components of this plan presents itself via the National PREP. The PREP guidelines satisfy the exercise requirements for USCG, USEPA, Pipeline and Hazardous Materials Safety Administration (PHMSA) and Bureau of Safety and Environmental Enforcement (BSEE). The PREP was developed to establish a workable exercise program, which meets the intent of OPA 90 for spill preparedness. PREP was developed to provide a mechanism for compliance with exercise requirements, while being economically feasible for government and oil industry to adopt and sustain. PREP is a unified federal effort and satisfies the exercise requirements for all federal agencies, which adheres to its guidelines. PREP represents minimum guidelines for ensuring adequate response preparedness. Additional information on PREP can be found by within the NPREP Guidelines.

The Area Exercises are divided into three classification categories: Equipment Deployment Drills, IMT Discussion-Based Exercises and Operations-Based, Functional or Full-Scale Exercises. The scope and objectives of Area exercises are detailed in the PREP guidelines. Members of the AC and response community will be involved in each type of exercise to some degree, varying from the confirmation of a phone number to assisting in the design of a scenario and performing as a controller or evaluator of the exercise. Participating in PREP and utilization of PREP guidance will ensure that all federal exercise requirements mandated by OPA 90 have been met.

Commercial vessel and waterfront facility response plan holders are required to meet the pollution response exercise requirements under OPA 90. Although participation in PREP satisfies these requirements, PREP is a strictly voluntary program. Plan holders are not required to follow PREP guidelines and, if they choose not to, may develop their own exercise program that complies with regulatory exercise requirements. ACP holders (USCG/USEPA) are required to follow PREP guidelines.
The PREP Guidelines outline the frequency and types of exercises plan holders should conduct to meet exercise requirements of the appropriate response plan regulations and how plan holders can take credit for exercises when they respond to an actual incident.

1500 STATE/LOCAL RESPONSE SYSTEMS

Each state governor is requested to designate one state official to represent the state on the appropriate RRT. The state's office/representative may participate fully in all activities of the appropriate RRT. Each state governor is also requested to designate a lead state agency that will direct state-lead response operations. This agency is responsible for designating the lead state response official for federal and/or state-lead response actions, and coordinating/communicating with any other state agencies, as appropriate. Local governments are invited to participate in activities on the appropriate RRT as may be provided by state law or arranged by the state's representative. Indian tribes wishing to participate should assign one person or office to represent the tribal government on the appropriate RRT. Appropriate state, tribal and local officials will participate as part of the response structure as provided in each GRP.

In addition to meeting requirements for local emergency plans under SARA Title III, state and local government agencies are encouraged to include contingency planning for responses, consistent with the NCP, RCP, and ACP in all emergency and disaster planning.

For facilities not addressed under CERCLA or CWA, states are encouraged to undertake response actions themselves or to use their authorities to compel potentially responsible parties to undertake response actions.

States are encouraged to enter into cooperative agreements pursuant to the applicable CERCLA sections to enable them to undertake actions authorized under subpart E of the NCP. Requirements for entering into these agreements are included in subpart F of the NCP. A state agency that acts pursuant to such agreements is referred to as the lead agency. In the event there

is no cooperative agreement, the lead agency can be designated in a Memorandum of Agreement (MOA) or other agreement.

Because state and local public safety organizations would normally be the first government representatives at the scene of a discharge or release, they are expected to initiate public safety measures that are necessary to protect public health and welfare and that are consistent with containment and cleanup requirements in the NCP, and are responsible for directing evacuations pursuant to existing state or local procedures.

OHIO

Ohio EPA is divided into five regulatory divisions that play different roles in environmental protection. Each division issues permits to regulate industries that pollute in a specific area, like air emissions or wastewater discharges to rivers and streams. The permits include requirements for operating, monitoring, and reporting compliance. There are a few core responsibilities that each division of Ohio EPA must fulfill. These are:

- Reviewing permit applications and issuing permits to facilities.
- Investigating citizen complaints.
- Monitoring to make sure all environmental standards are met (usually accomplished by collecting samples of air, water, or soil and testing them for pollutants in a laboratory; and reviewing sampling and monitoring data submitted by a facility).
- Providing technical assistance to help regulated facilities obey environmental laws and permit requirements.
- Taking enforcement action against facilities that do not obey environmental laws and permit requirements.

Ohio EPA's Site Assessment & Brownfield Revitalization Program (SABR), in conjunction with the Ohio Department of Development, helps manage the Clean Ohio Revitalization Fund by serving as the contact for property owners of brownfields or contaminated sites that are not entered into a cleanup program (e.g., VAP, remedial response, Superfund, Resource Conservation and Recovery Act of 1976 (RCRA) corrective action).

Toll-free hotlines are operated by each district office to offer advice and information, and to assist anyone who wants to report an alleged violation of Ohio's environmental laws (see numbers above). You may also contact Ohio EPA's Public Interest Center at (614) 644-2160.

A statewide toll-free number (1-800-282-9378) is available 24 hours a day to report spills and other environmental emergencies.

PENNSYLVANIA

The emergencies to which DEP responds can also be divided into these groups. The first of these include those emergencies, which do not pose a significant threat to the response personnel

(e.g., an oil spill, a water shortage, or a food-borne illness). The second group includes those emergencies, which although they do pose a risk to the response personnel, are within the normal range of duties of the responsible program staff (e.g., a forest fire, a mine accident, or a fixed nuclear facility incident). The third group includes hazardous materials releases to the air, ground, or water, which are beyond the response capabilities of the normal program staff, due to the specialized sampling, mitigation, and personal protective equipment and training required. For the purpose of clarification in this plan, the term "emergency" shall refer to all three of the above groups; and the term “hazardous materials incident” shall refer specifically to this last group.

The Environmental Emergency Response Program's mission is to ensure prompt response to the above first two groups through coordination of the regular program staffs and to form and train emergency response teams to respond to hazardous materials incidents. The Environmental Emergency Response Program is structured to protect the natural environment and to protect the public health and safety at the above-listed emergencies by providing timely assistance to the organization or persons primarily responsible for the control of the emergency. This might be a DEP program, a fire chief, the police, elected officials, a facility owner, or a federal agency. For the purposes of this manual, these parties, who are responsible for the response, will be called "Incident Commanders." The Environmental Emergency Program is not structured to provide those services normally under the province of these incident commanders, nor is it structured to preempt the incident commanders' prerogatives in carrying out their duties. It is a program which provides consultation in the techniques to be used for a particular situation to best protect public health and the environment and which provides coordination of DEP multi-program responses.

An important aspect of DEP's program is the tenet that the person responsible for causing the problem is responsible for all aspects of correcting the problem. In the case of spills, local elected officials, through their emergency response agencies, are generally responsible for providing immediate containment and mitigation, at least until the responsible party can take over the response. Mitigation, containment, and clean-up are generally not proper functions of the Emergency Response Program. However, all personnel involved with this program will carry, in their vehicles and in the vans, a small quantity of commonly used containment supplies and equipment. They will use this equipment in a limited number of cases under special circumstances (e.g., a dire emergency, they are first on the scene, low hazard exposure to the DEP personnel). Additionally, the department's Regional Emergency Response Program Managers are authorized to enter into emergency contracts on behalf of the department, when the responsible party or the first responders are unable or unwilling to act; and immediate action is necessary to protect the public health or the environment.

NEW YORK

Being worked on by New York DEC officials.

STATE RESPONSE SYSTEMS

OHIO

Being Developed

PENNSYLVANIA

COMMUNICATIONS AND NOTIFICATIONS

1. AVAILABILITY

DEP maintains a twenty-four hour, seven days per week availability to receive calls regarding environmental emergencies, natural disasters, or man-made disasters.

The Director, Environmental Emergency Response, primary Emergency Preparedness Liaison Officer (EPLO) to Pennsylvania Emergency Management Agency (PEMA), can be reached, when on duty, by commercial phone or pager. The secondary and tertiary EPLOs can also be reached in this manner. In addition to notification by PEMA, the director or his alternate can be notified independently during major disasters involving activation of the federal, national, or regional contingency plans. Each regional office, and the central office, contracts with an answering service to receive off-hour calls. Each office shall have, at all times, someone available to receive these calls from the answering service, either by being available at a number which the answering service is made aware of or by being within pager range. Direct referral by the answering service is preferred; and, the capability to patch or forward a call directly to the DEP employee should be a requirement of the answering service contracts where available. The DEP employee who receives these calls will have the technical expertise to evaluate the severity of the incident and will have sufficient authority to contact, form, and dispatch an emergency response team. When personnel other than the Emergency Response Program Manager or the assistant serve in this capacity, the number of such backup personnel should be minimized so that they maintain a familiarity with the emergency response program duties and responsibilities.

2. NOTIFICATION

Notifications to the Department; Notification of environmental emergencies can come from a number of sources, including; fire services, police, emergency medical services, county emergency management agencies, PEMA, EPA, the USCG, regulated industries, or the general public. Regional ERPM's are encouraged to develop personal contacts with the organizations in their regions who may be calling or DEP for assistance so that the regional personnel may be contacted directly. These regionally initiated requests are handled directly by the regions.

a. Incidents involving potential or actual evacuations, injury or death, major road closings, or train derailment, or major spills or discharges, must be reported to the Director, Environmental Emergency Response (EER).

b. Calls referred to the regions from central office may simply be referrals on which no further reports are required or they may require continuing communications. In general, if PEMA becomes involved, the Director, EER, must be kept advised of the status of DEP's involvement until the incident is closed out. The specific requirements for call back will be transmitted with the initial discussions with the central office.

Notifications by the Department:

a. It is the responsibility of the Emergency Response Program Manager or the employee serving in this capacity, to initiate the information flow and assure that the appropriate DEP program staff, the Fish Commission, the County Emergency Management Agencies, the Community Relations Coordinator, the Director, EER, and other parties are notified as appropriate.

b. DEP program staff is responsible for making their own notifications, e.g., Water Supply and Community Health notifies downstream water users, Bureau of Water Quality Management (BWQM) notifies affected sewer authorities, the CRC notifies the media when appropriate, and the Director, EER, notifies senior staff, PEMA, and other affected regions or states.

3. COMMUNICATIONS

a. The department has an extensive VHF radio network that enables virtually statewide communication among technical staff in the field and the regional offices, district offices, and central office.

b. Each department facility maintains a base station console.

c. All of the emergency response vehicles and large numbers of program vehicles are equipped with mobile radios.

d. Portable radios are pooled for field assignment, should out-of-vehicle use be necessary.

e. The mobile radios assigned to the Emergency Response Teams are capable of accessing PSP, PEMA, and counties radio frequency to facilitate coordination during incidents.

f. Department EPLOs maintain current office, home, and pager phone numbers with PEMA to assure availability should the Emergency Operation Center (EOC) be activated or some other response from the Department is requested. The EPLOs maintain a current on/off hour phone list of Emergency Response Program Managers (ERPM) and senior department management.

g. The Director, EER, has direct access to the Secretary during off-hours.

h. The Director, EER, maintains two phone lines at his residence in order to more easily accommodate emergency messages.

i. The Director, the ERPMs, and Assistant ERPMs also have mobile cellular telephones installed in their vehicles

j. In the event of activation of the National or RCPs, the Director, EER, or alternate Director, can be contacted on a twenty four-hour basis by the RRT Coordinator.

4. ORGANIZATION AND RESPONSIBILITIES

a. Regional Emergency Response Program Manager:

(1) Receives notification of incident from PEMA, EPA, the Coast Guard, County EMA's, fire companies, state or local police, the DEP regulated community, the DEP staff, the statewide duty officer, Director EER, or the general public.

(2) Makes initial determination whether an immediate response is necessary and whether problem is under Regional Director's authority.

(3) If no immediate response is necessary, logs relevant information, and forwards to appropriate program area next business day.

(4) If problem is not under Regional Director's authority, refers to the Director, Environmental Emergency Response, or the appropriate DEP program area.

(5) If an immediate response is necessary, formulates and coordinates the response through the emergency response staff, the volunteer teams, and the appropriate program bureaus. Manages response from his home, on-site, or the regional office (if wide area radio coverage is necessary for the response).

(6) Arranges for necessary staff, equipment, and supplies on scene at the incident.

(7) Notifies the Director EER or any major incidents, any incidents involving injuries or death, major highway closings, train derailments, evacuations, or any other incidents of a politically or publicly sensitive nature.

(8) Keeps Director informed of the progress of these major incidents, as decided during initial notification.

(9) Ensures downstream water users notified of any potential impacts from pollution.

(10) Arranges for containment, mitigation, and clean-up of incident, either through the responsible party, a local fire company, or through emergency contract procedures.

(11) Serves as DEP team leader on scene at an incident.

(12) Provides technical assistance to fire, police, and county EMA's in responding to emergency incidents.

(13) Provides a liaison to a specified Area EOC.

b. Director, EER:

(1) Receives notification of incident from EPA, the USCG, County EMA's, fire companies, state or local police, the DEP regulated community, the DEP staff, the Regional Emergency Response Coordinator, the DEP regulated community, PEMA, or the general public.

(2) Refers incidents to the appropriate regional ERPM, or the appropriate program area.

(3) Notifies the Secretary and appropriate deputies of any major incidents, any incidents involving injuries or deaths, major highway closings, train derailments, evacuations, or any other incidents of a politically or publicly sensitive nature.

(4) Notifies PEMA of any of the above major incidents as soon as confirmation is received from on site or as soon as their need for involvement becomes clear.

(5) Coordinates with other commonwealth agencies to obtain needed assistance at emergency incidents.

(6) Authorizes expenditures of emergency funds to contain, mitigate, or clean-up incidents, when necessary to protect the public health.

(7) Deploys emergency response representatives to the State EOC as requested by PEMA, for the coordination of Department emergency activities.

c. Regional Emergency Response Staff.

(1) Serve as technical consultants at emergency incidents to provide consultations on the levels of concern, the potential paths of dispersion, the areas of impact, and protective actions for the public and for the responders.

(2) Provide real-time monitoring around the area of an incident to depict the area affected and assist in defining the need for various control zones.

(3) Provide assistance in acceptable methods of containment and clean-up and ensure work proceeds in an environmentally acceptable manner.

(4) Collect samples at emergency incidents to attempt to characterize the materials involved and the extent of the contamination.

(5) Assist other DEP program areas by providing needed resources and assistance during emergency situations.

d. Field Operations Programs.

(1) Air Quality Control.

(a) Provides assistance in modeling releases of hazardous materials.

(b) Provides real-time meteorological information at nineteen stations across the state on a 24-hour basis.

(2) Water Supply and Community Health.

(a) Warns downstream water users of potential contamination and recommends protective actions.

(b) Samples water supplies and emergency water supplies.

(c) Assists in providing emergency supplies of drinking water.

(d) Inspects evacuation centers, mass care centers, and temporary housing to ensure safe water and sanitary conditions.

(e) Reports any information on damage to public water supply systems to Emergency Response Program Manager or Director Environmental Emergency Response for collation and transmittal to PEMA.

(f) Supplies technical advice in the repair or replacement of public water supply systems damaged during a disaster.

(g) Supplies technical advice and assistance in air, water, food, or vector transmitted diseases.

(h) Conducts field surveys in coordination with the Department of Health of actual or potential public health hazards.

(i) Disseminates information of federal financial assistance available to the operators of publicly owned water supply systems.

(j) Provides staff assistance for the development and promulgation of water conservation orders.

(k) Coordinates emergency sources of water or interconnections with other suppliers for purveyors who are experiencing shortages due to insufficient or contaminated supplies.

(l) Provides technical assistance to water suppliers on conservation or rationing measures.

(m) Prepares and maintains the State Water Plan and other water supply plans identifying communities and water supply systems with potential drought, yield, distribution, drinking water quality, and other water supply problems.

(n) Cooperates with federal, state, county, municipal, and other agencies in planning and implementation of water supply improvements.

(o) Assures the development of appropriate drought and water supply emergency plans by water suppliers.

(p) Cooperates with basin commissions, state, and other agencies in the development and implementation of comprehensive interstate and regional drought and water supply emergency plans.

(3) Waste Management.

(a) Provides assistance at spills of any materials that have a potential adverse impact on the environment or on public health.

(b) Provides spill containment and mitigation activities commensurate with degree of risk posed by the incident.

(c) Provides assistance in disposing of materials resulting from the clean-up of an emergency or pollution incident.

(d) Maintains detailed records of toxic waste sites in the Commonwealth.

(e) Disseminates information of federal financial assistance available to the operators of solid waste facilities.

(4) Water Quality Management

(a) Provides assistance at spills of any materials which impact ground or surface water.

(b) Provides spill containment and mitigation activities commensurate with degree of risk posed by the incident.

(c) Conducts sampling of ground or surface water during an environmental emergency or pollution incident.

(d) Reports any damage or disruption of sewage disposal facilities to ERPM or EER Director for collation and transmittal to PEMA.

(e) Supplies technical advice in the repair or replacement of sewage disposal facilities damaged in a disaster.

(f) Disseminates information of federal financial assistance available to the operators of sewage disposal systems.

NEW YORK

New York State Hazardous Material Emergency Contingency Plan defines the responsibilities of State agencies and provides operational guidance to insure their proper coordination in responding to emergencies involving hazardous materials and petroleum. The plan coordinates state government efforts with local government and industry, manages and coordinates actions of state agencies, assists Federal agencies as needed and provides a system for the orderly transition from local management to state management of response activities.

New York State DEC is the designated lead state agency for emergencies resulting in contamination of surface or groundwater's from spills or releases of hazardous materials and petroleum. In the event that the Governor issues a State Disaster Emergency Declaration, the New York State Division of Homeland Security and Emergency Services (NYSDHSES) is responsible for advising appropriate federal agencies of the emergency and establishing a State RRT to ensure the availability of appropriate assistance within the affected area.

The state RRT will be organized geographically along SEMO regional boundaries. Each RRT will consist of the NYSDHSES Regional Director for the affected area, representatives from State agencies, a National Guard Liaison officer and a field representative of the American Red Cross. The state RRT analyzes and assesses the impact of the event, provides technical assistance to local officials as necessary, and advises the Governor of a recommended course of state action. The state RRT does not preempt the lead state agency's responsibilities, nor interfere with normal state emergency operational or command post operations.

LOCAL RESPONSE SYSTEMS:

In the coastal counties NY, PA, and OH, located within the Eastern Great Lakes Area, local government holds the responsibility for initial response to a HAZCHEM incident, and the local fire chief is the incident commander for managing the emergency response to such an incident.

Many local cities, towns, and municipalities have HAZMAT teams/emergency service units capable of providing initial response to the emergency event, for mitigating its effects and for protecting public health and welfare and the environment.

1600 NATIONAL POLICY & DOCTRINE

1610 PUBLIC AND PRIVATE RESOURCE UTILIZATION

OPA 90 reaffirmed the basic principle that the primary source of an oil spill preparedness and response system in the U.S. should be implemented and maintained by the private sector. It is not, nor should it be, the USCG or USEPA intent to compete with the commercial oil and hazardous materials pollution response industry. The utilization of government resources in lieu of commercial resources can place the government in a competitive environment. This is not the intent of OPA 90, as it defeats the incentive for commercial enterprise to maintain equipment and trained personnel in a competitive market. USCG's pre-positioned response equipment, other publicly owned response equipment, and other initiatives under the USCG's oil spill response program may 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. [Link to D9 Trailer INST16465.1]

The FOSC has the authority and responsibility in accordance with the NCP 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 UC, when the RP 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 USEPA, USCG, USDOD, 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.

1620 BEST RESPONSE CONCEPT

The term "Best Response" means a response organization will effectively, efficiently, and safely respond to oil spills, minimizing consequence of pollution incidents and to protect our national environmental and economic interests.

"Best Response" equals a successful response based on achievement of certain key success factors (i.e. things that a response must accomplish to be considered successful) as follows:

- Human Health
  - No public injuries
  - No worker injuries
- Natural Environment
  - Source of discharge minimized
  - Source contained
  - Sensitive areas protected
  - Resource damage minimized
- Economy
  - Economic impact minimized
- Public Communication
  - Positive media coverage
  - Positive public perception
- Stakeholders Support
  - Minimize stakeholder impact
  - Stakeholders well informed
  - Positive meetings
  - Prompt handling of claims
- Organization
  - Standard response management system
  - Sufficient/efficient resources

When conducting an oil spill response, IC/UC and their Command and General Staffs should always consider the "Best Response" concept while managing operational and support/coordination functions. Additional information on "Best Response" Concept is listed in Chapter 20 of the USCG IMH.

IC/UC and their Command and General Staffs need to closely monitor how well incident objectives, strategies, and tactics are addressing "Best Response" and key response functions, and to make appropriate adjustments where necessary to ensure maximum potential for success.

1630 FISH AND WILDLIFE ACTS COMPLIANCE

1630.1 MIGRATORY BIRDS

A large number of international treaties and domestic laws have been enacted that provide protection for migratory birds. Legal authorities may be categorized as primary or secondary.

Primary authorities are international conventions and major domestic laws that focus primarily on migratory birds and their habitats. Secondary authorities are broad-based domestic environmental laws that provide ancillary but significant benefits to migratory birds and their habitats.

Primary Federal Authorities for Migratory Birds and Their Habitats

Primary authorities of the United States for migratory birds may be divided into those that protect bird populations and those that protect bird habitats. Authorities which protect bird populations include: Lacey Act of 1900, Weeks-McLean Law of 1913, Migratory Bird Treaty Act of 1918, Endangered Species Act of 1973, four international conventions (treaties) with Canada, Mexico, Japan and the former Soviet Union, Ramsar Convention, Antarctic Treaty, Bald Eagle Protection Act, Waterfowl Depredations Act, Fish and Wildlife Conservation Act, and the Wild Bird Conservation Act. Primary authorities for protecting bird habitats include: Duck Stamp Act, Wetlands Loan Act, Emergency Wetlands Resources Act, Migratory Bird Conservation Act and the North American Wetlands Conservation Act. Several of these authorities may come into play during an emergency response, most notably the following:

Bald Eagle Protection Act of 1940

The Bald Eagle Protection Act provides for the protection of the bald eagle (the national emblem) and the golden eagle by prohibiting, except under certain specified conditions, the taking, possession and commerce of such birds. The 1972 amendments increased penalties for violating provisions of the Act or regulations issued pursuant thereto and strengthened other enforcement measures. Rewards are provided for information leading to arrest and conviction for violation of the Act.

Migratory Bird Treaty Act (MBTA) of 1918

The Migratory Bird Treaty Act (MBTA) implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico, Japan and the Union of Soviet Socialists Republics further expanded the scope of international protection of migratory birds. Each new treaty has been incorporated into the MBTA as an amendment and the provisions of the new treaty are implemented domestically. These four treaties and their enabling legislation, the MBTA, established federal responsibilities for the protection of nearly all species of birds, their eggs and nests.

The MBTA made it illegal for people to "take" migratory birds, their eggs, feathers or nests. Take is defined in the MBTA to include by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing or transporting any migratory bird, nest, egg, or part thereof. In total, 836 bird species are protected by the MBTA, 58 of which are currently legally hunted as game birds. A migratory bird is any species or family of birds that live, reproduce or migrate within or across international borders at some point during their annual life cycle.

The USFWS, Division of Migratory Bird Management, issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, educational, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal.

On November 26, 2003, the USFWS established a new category of migratory bird permit, namely, bird rehabilitation (50 CFR Parts 17, 21 and 22). Rehabilitation permits take the place of the old special use permits for rehabilitation by specifically authorizing migratory bird rehabilitation, including rehabilitation of migratory bird species listed as threatened or endangered under the Endangered Species Act. The new permits, applicable to approximately 2500 bird rehabilitators nationwide (veterinarians are exempt), set specific requirements to take, temporarily posses, or transport any migratory bird for rehabilitation purposes. However, any person who finds a sick, injured, or orphaned migratory bird may, without a permit, take possession of the bird in order to immediately transport it to a permitted rehabilitator.

Prior to entering the location of an oil or hazardous material spill, a permitted rehabilitator must obtain authorization from the FOSC and a designated representative of the USFWS. All activities within the location of a spill are subject to the authority of the FOSC. The USFWS is responsible for the disposition of all migratory birds, dead or alive, and for overseeing migratory bird rehabilitation by permitted organizations, such a Tri-State Bird Rescue and Research or International Bird Rescue. Facilities used in migratory bird rehabilitation activities should conform as closely as possible with the facility specifications contained in the USFWS policy *Best Practices for Migratory Bird Care During Oil Spill Response*. Caging dimensions should follow standards developed by the National Wildlife Rehabilitators Association and the International Wildlife rehabilitation Council (*Minimum Standards for Wildlife Rehabilitation, 2000).*

1630.2 MAMMALS

Marine Mammal Protection Act of 1972 (MMPA)

The Marine Mammal Protection Act (MMPA) established a federal responsibility to conserve marine mammals. Management of sea otter, walrus, polar bear, dugong, and manatee is vested with the Department of the Interior's USFWS. The Department of Commerce's NOAA is responsible for managing cetaceans (whales and dolphins) and pinnipeds (seals and sea lions), other than the walrus. Under the MMPA, it is illegal to harass, hunt, capture or kill, or attempt to harass, hunt, capture or kill any marine mammal. Some marine mammals receive additional protection under the Endangered Species Act.

The NOAA Fisheries Office of Protected Resources works in collaboration NOAA Fisheries Regions, Fisheries Science Centers and Partners to develop and implement a variety of programs for the protection, conservation and recovery of the approximately 175 mammal stocks listed under MMPA. The USFWS has similar programs for mammals under its jurisdiction.

1630.3 FISH

The USFWS has management authority for Anadromous fish species, inter-jurisdictional (coastal) fishes, and inland threatened or endangered species under a variety of laws including, but not limited to the Endangered Species Act, Fish and Wildlife Conservation Act, Atlantic Stripped Bass Act and the Anadromous Fish Conservation Act. The NOAA has management authority over marine, estuarine and Anadromous species under a variety of laws including the

Endangered Species Act, Magnuson-Stevens Fishery Conservation and Management Act and the Anadromous Fish Conservation Act. The individual states have responsibility for all fishes within their state boundaries, except where federal law supersedes.

It is unlikely that large numbers of adult fish in large bodies of water would be killed by petroleum discharge. However, suffocation can occur in small water bodies if oxygen transport across gill surfaces is obstructed by a coating of oil or dissolved oxygen levels fall below sustainable amounts. If there is a fish kill, prompt collection and documentation should be accomplished in coordination with the appropriate management authority in order to avoid secondary impacts on predatory mammals and birds. Chronic exposure to low concentrations of petroleum hydrocarbons in water, sediment or food produces sub lethal effects, including changes in heart and respiratory rate, enlarged liver, reduced growth, fin erosion, a variety of biochemical and cellular changes, and reproductive and behavioral responses. Various groups of fishes and their varied life stages differ in susceptibility to petroleum products. Generally, the egg and larval stages are most sensitive, followed by juveniles and adults.

Magnuson-Stevens Fishery Conservation and Management Act of 1996

This law, more popularly known as the Sustainable Fisheries Act, amended the Fishery Conservation and Management Act of 1976. The amendments mandate the Secretary of Commerce to promulgate guidelines for identification of essential fish habitat by Fishery Management Councils. Section 305(b) (2)-(4) outlines a process for the National Marine Fisheries Service (NMFS) and Councils to comment on activities proposed by federal agencies that may adversely impact areas designated as essential fish habitat. Essential fish habitat is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, growth and maturity.

The consultation process is usually integrated into existing environmental review procedures, such as the Endangered Species Act or Fish and Wildlife Coordination Act. The NMFS provides the federal agency with essential fish habitat recommendations that would avoid, mitigate or offset the adverse impact of a proposed activity on essential fish habitat. The recommendations are advisory in nature, but the federal agency must respond within 30 days from the date the recommendations are received. If the federal agency chooses not to adopt the NMFS recommendations, it must provide an explanation.

National Marine Sanctuaries Act of 1972

The National Marine Sanctuaries Act (NMSA) authorizes the Secretary of Commerce to designate and protect areas of the marine environment with special national significance due to their conservation, recreational, ecological, historical, scientific, cultural, archeological, educational, or esthetic qualities as national marine sanctuaries. Day-to- day management of national marine sanctuaries has been delegated by the Secretary of Commerce to NOAA's Office of National Marine Sanctuaries. The primary objective of the NMSA is to protect marine resources, such as coral reefs, sunken historical vessels or unique habitats.

Thunder Bay National Marine Sanctuary is located in northwestern Lake Huron; Thunder Bay is adjacent to one of the most treacherous stretches of water within the Great Lakes system.

Unpredictable weather, murky fog banks, sudden gales, and rocky shoals earned the area the name "Shipwreck Alley." Today, the 4300-square-mile Thunder Bay National Marine Sanctuary protects one of America's best-preserved and nationally- significant collections of shipwrecks. Fire, ice, collisions, and storms have claimed over 200 vessels in and around Thunder Bay. To date, nearly 100 shipwrecks have been discovered within the sanctuary. Although the sheer number of shipwrecks is impressive, it is the range of vessel types located in the sanctuary that makes the collection nationally significant. From an 1844 sidewheel steamer to a modern 500foot-long German freighter, the shipwrecks of Thunder Bay represent a microcosm of maritime commerce and travel on the Great Lakes.

1630.4 ENDANGERED SPECIES ACT (ESA)

The Endangered Species Act (ESA) of 1973

This law was enacted to conserve and recover threatened and endangered species and the ecosystems upon which they depend. The Act is administered by the USFWS in the Department of the Interior and the NMFS in the Department of Commerce. Under Section 7 of the ESA, federal agencies must consult with these trustee agencies on actions they take, permit, or fund which may jeopardize listed endangered species or adversely modify their designated critical habitat. During emergencies, such as disasters, casualties, national defense or security emergencies, and response to oil spills, the ESA allows for emergency consultation during the event, with formal consultation occurring after the event, if necessary.

Implementation of the Interagency Memorandum of Agreement for the Endangered Species Act

Signed by the USCG, USEPA, NOAA, USDOI, USFWS, and NMFS, aligns the consultation requirements with the pollution response responsibilities outlined in the NCP, 40 CFR 300. The MOA is intended to be used at the AC level primarily to identify and incorporate plans and procedures to protect listed species and designated critical habitat during spill planning and response activities.

A guidebook was developed for the MOA by the signatory agencies to further facilitate cooperation and understanding between the agencies involved in oil spill planning and response. This cooperation is highly successful when it is established before an incident occurs and should continue throughout an incident and the post-incident follow-up and review. By working proactively to identify the potential effects of spill response activities on species and their habitat, and then developing response plans and countermeasures, impacts to listed species and/or critical habitat can be reduced or avoided completely during an incident. Using the MOA guidebook, the following checklists were developed to assist FOSCs during Pre-Spill Planning, Emergency Response and Post Response activities.

[Link to ESA MOA]

1640 PROTECTION OF HISTORIC PROPERTIES NATIONAL HISTORIC PRESERVATION ACT (NHPA)

Section 106 of the NHPA provides that federal agencies are to take into account the effects of "federal or federally assisted undertakings" on histories properties that are listed in or eligible for inclusion in the National Register of Historic Places. An "undertaking" includes an environmental response coordinated by an FOSC. The NCP does not provide specific guidance for taking historic properties into account during emergency response to an actual or threatened release of a hazardous substance, pollutant or contaminant or to the discharge of oil or other pollutants. Also, emergency provisions contained in the regulations implementing Section 106 of the NHPA do not directly address requirements for such emergency responses.

As a result, several federal departments and agencies entered into a Programmatic Agreement on the Protection of Historic Properties (http://www.achp.gov/NCP-PA.html) during emergency response under the NCP to ensure that historic properties are taken into account in their planning for and conduct of the emergency response under the NCP. Generally, during pre-incident planning, historic properties and exclusions are identified to the fullest extent possible; notification lists are generated; and emergency response strategies are developed. During a federally-led emergency response in an area that has not been excluded, the FOSC will activate the agreed-upon mechanism for addressing historic properties, including notification of the identified parties, consult with them regarding historic properties that may be affected, assess the potential effects of emergency response, and develop and implement response activities. Note that if it is clear to the FOSC that no historical property is involved, then there is no need to obtain expertise or hire a Historic Properties Specialists to make such a determination. It is recognized that historic properties is only one of the many issues that FOSCs take into account when responding to a spill. The USDOI requires notification when any USDOI facility that is protected under the NHPA has been or may be impacted by a discharge of oil/hazmat. Each state has a State Historic Preservation Officer (SHPO). The SHPO can provide many important services to local governments and historic preservation commissions. The SHPO is designated by the Governor of each state. In some states, he or she serves directly in the Governor's cabinet or executive office. In other states, the SHPO may be an official in an archives department, a state historic society, or a state museum.

Under NPS regulations, a staff of appropriate preservation officials, in most cases including historians, architectural historians, historical architects, and archaeologists, must assist each SHPO. Academic institutions, historical and archeological societies, and other preservationoriented groups through contracts or cooperative agreements also assist many SHPOs.

Most SHPOs receive their primary funding from their state legislatures. In addition, NPS provides SHPOs with grants-in-aid from the Historic Preservation Fund (HPF), a special fund created by the National Historic Preservation Act. HPF grants must be matched with non-federal funds or in-kind contributions.

The NHPA established certain SHPO responsibilities. These include the following:

- Ensuring comprehensive statewide historic preservation planning.
- Conducting a statewide survey to identify historic properties.

- Nominating properties to the National Register of Historic Places.
- Assisting local governments in developing historic preservation programs and in becoming certified to participate in the national program.
- Advising and assisting in federal, state, and local historic preservation projects.
- Participating in review of federal, state, and local undertakings that may affect historic properties.
- Providing public information, education, training, and technical assistance in historic preservation.

Under NPS regulations, SHPOs may also participate in NPS certification of properties and projects for historic preservation tax incentives. In addition, SHPOs carry out duties under state laws, and seek to advance the interests of historic preservation generally in their states. For example, many SHPOs:

- Conduct preservation conferences and workshops.
- Distribute state grants and loans for preservation.
- Maintain and interpret state-owned historic properties.
- Conduct programs to acquire and administer historic preservation easements.
- Administer state legislation to protect historic properties from non-federal construction and land-use projects.
- Administer state legislation relating to archeological resources, shipwrecks, and other special kinds of historic properties.
- Publish newsletters, scholarly publications, and popular books and brochures.
- Administer state history museums and conservation laboratories.
- Develop and support state and local preservation statutes.
- Help state and local authorities use preservation in primary and secondary curricula and in public education generally.
- Provide technical assistance to owners of historic properties.

[Link to SHPOs]

1650 CLEANUP ASSESSMENT PROTOCOL (HOW CLEAN IS CLEAN)

40 CFR 300.320 states: "Removal shall be considered complete when so determined by the FOSC in consultation with the Governor(s) of the affected state(s). When the FOSC considers removal complete the OSLTF removal funding shall end." Due to the differences in incident type and complexity, the FOSC will take all issues and agency concerns into consideration prior to making the "Removal Complete" assessment. Any group(s), or individual(s) with issues or concerns regarding an incident clean up, should forward them via the Liaison Officer (LOFR) or their respective Governor's office.

1650.1 USE OF CHEMICAL AGENTS

The FOSC must choose the best method from available response tools in any incident. The physical recovery and removal of oil is the preferred cleanup technique. Under certain conditions, however, chemical agents can be an effective tool. There are no pre- approved uses of chemical agents in the Great Lakes. If chemical use is considered, the RCP guidelines are intended to aid the FOSC in making a decision. [Link to RCPs]

USEPA has compiled the NCP Product Schedule, a list of chemicals counter-measures which the FOSC and/or PRP may consider for use during a spill emergency. The Product Schedule does not authorize or pre-approve use of any listed products. The FOSC may not authorize use of a product that is not listed on the Product Schedule.

1650.2 DISPERSANT PRE-APPROVAL/MONITORING/DECISION PROTOCOL

Use of dispersants or other oil emulsifiers is not pre-approved anywhere in the Great Lakes. The FOSC may not authorize use of a product that is not listed on the Product Schedule.

1650.3 IN SITU BURN (ISB) APPROVAL/MONITORING/DECISION PROTOCOL

In order to minimize environmental impacts and facilitate effective cleanup of an oil spill, responders have a limited number of techniques available to them. These include mechanical methods, use of certain chemical countermeasures, and ISB. In situ burning involves the controlled burning of oil that has spilled from a vessel or a facility, at the location of the spill. Under certain specific conditions, ISB may offer a logistically simple, rapid, inexpensive, and relatively safe means for reducing shoreline impacts of an oil spill. Moreover, because a large portion of the oil is converted to gaseous combustion products, the need for collection, storage, transport, and disposal of recovered material can be substantially reduced. ISB may be able to remove a large amount of spilled oil before spreading and drifting of the spill fouls shorelines and threatens wildlife. In certain circumstances, such as oil spilled in ice conditions, burning may be the only viable response technique. Authorization of ISB is subject to consultation and concurrence from the state and USDOI. Considerations for use should include an analysis of oil location and potential impact of smoke on downwind populations.

See Sections 1660 and 3270.

1650.4 BIOREMEDIATION APPROVAL/MONITORING/DECISION PROTOCOL

The objective of bioremediation is to accelerate the rate of hydrocarbon degradation due to natural microbial processes by bio-stimulation or bio-augmentation.

Incident–specific RRT approval is required; products must be on the NCP Product Schedule to be considered for use.

- Verify need for applicable state requirements.

- Prior to listing, products must submit efficacy test results to be listed on the Product Schedule. The evaluation criteria were established by a scientific panel under the USEPA Bioremediation Action Committee and are noted as minimal standards for acceptance.
  - The test uses Alaska North Slope crude oil with water-oil control, oil-nutrients, and oil-agent.
  - Samples are taken at day 0, 7, and 28 for GC/MS analysis of alkanes and aromatics, and gravimetric change in weight after 28 days.
  - The standard for listing is: The products need to perform statistically significantly better than the control.
  - The conditions of the efficacy test are ideal: closed, well-mixed flasks where neither nutrients nor microbes are lost from the system, competition from indigenous microbes is minimal, and aeration is good.
  - Performance in the field will most certainly differ.

See Section 3280.

1660 SPECIALIZED MONITORING OF APPLIED RESPONSE TECHNOLOGY (SMART)

SMART establishes a monitoring system for rapid collection and reporting of real-time, scientifically based information, in order to assist the UC with decision-making during ISB or dispersant operations. SMART recommends monitoring methods, equipment, personnel training, and command and control procedures that strike a balance between the operational demand for rapid response and the UC's need for feedback from the field in order to make informed decisions. SMART is not limited to oil spills. It can be adapted to hazardous substance responses where particulate air emission should be monitored, and to hydrocarbon-based chemical spills into fresh or marine water. For additional SMART information and guidance see http://response.restoration.noaa.gov/smart.

1660.1 ALTERNATE RESPONSE TOOL EVALUATION SYSTEM (ARTES)

The OSC then can make an informed decision on the use of the proposed tool. A set of forms has been developed for use in the ARTES process.

ARTES was designed by workgroups of Regional Response Teams (RRTs) II and III. (RRTs are teams of federal and state response agencies.) ARTES is now in place in most RRTs. http://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/resources/alternativehttp://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/resources/alternative-response-tool-evaluation-system-artes.htmlresponse-tool-evaluation-system-artes.html

1670 SENSITIVE SECURITY INFORMATION (SSI) RELATING TO ACPs

The NRT tasked the NRT Preparedness Committee with developing a list of sensitive information types and implementation guidelines for removing and reposting this information from the ACPs and RCPs so that the public could obtain access to the plans. As a result, the attached list of 12 types of sensitive information attempts to make an accommodation between removing all information that terrorists might find helpful and going "too far" by removing information that is of particular value to the incident planning and response communities. The list of 12 types of sensitive information has been reviewed by USCG Intelligence, Port Security and web content officials and deemed "reasonable and justifiable."

1670.1 IMPLEMENTATION

ACPs and RCPs containing any of the itemized types of sensitive information are considered for official use only and may be distributed only at the plan administrator's (e.g., RRT Co-Chair or other individual designated by the RRT Co-Chair, DRAT) discretion.

1670.2 RCPs

As of December 31, 2003, RCPs posted on the internet should not contain any sensitive information.

1670.3 ACPs

As of December 31, 2003, ACPs posted on the internet should not contain any sensitive information.

1670.4 ITEMIZATION OF SENSITIVE INFORMATION

The following types of sensitive information should have been removed from all GRPs, ACPs and RCPs:

- Personal contact information for agency personnel to include their home addresses and phone numbers (unless this phone number is used as an agency emergency contact notification).
- Personal contact information of chemical and petro-chemical facility personnel to include their names, home addresses, and phone numbers.
- Petro-chemical and chemical facility information, to include: facility schematics showing pipe and tank locations; products and hazardous materials handled including volumes, types, and locations; transfer schedules; and/or security measures.
- Locations of radiation sources in the region (lists of facilities with licenses and what type of source).
- Maps or diagrams depicting hazardous material plume trajectories (in the event of a release), based on actual products transported, stored, or manufactured in the area. (Note: Oil spill trajectories as they relate to possible scenarios are not considered sensitive.)

- Hazardous Materials (HAZMAT) and WMD scenarios based on actual products transported, stored, or manufactured in the area.
- Bulk chemical and liquefied hazardous gas carrier schedules and routes. (Note: Many LNG/LPG vessels have moving and/or fixed Safety Zones (33CFR165) associated with them; however, their routes are not identified in the regulations and likewise should not be made available through an ACP.)
- Railroad references when detailing bulk HAZMAT shipments.
- Oil, chemical and natural gas pipeline diagrams.
- Locations of public and private drinking water systems including intakes, pumping stations, wells, and other key delivery components.
- Hazmat and public health resource listings including hospitals able to assist with decontamination and disposal of biologically contaminated material.
- Terrorism annexes (for all plans that have included them).

The AC will review the respective ACP's to ensure the 12 types of sensitive information listed above are removed as appropriate and reposted for Internet access in accordance with the NRT ACP-RCP Internet Security Technical Assistance Document of 12 Aug 03.

2000 COMMAND

2100 UNIFIED COMMAND

The NCP requires FOSCs to direct response efforts and coordinate all other actions at the scene of a discharge or release. The NCP further states that the basic format for the response management system is a structure that brings together federal, state, tribal, local agencies and responsible party, to achieve an effective and efficient response. This approved structure is NIMS/ICS Unified Command (UC).

ICS UC is an application of ICS used when there is more than one agency with jurisdiction or when incidents cross-political boundaries. Agencies work together through designated members of the UC to establish their designated Incident Commanders at a single ICP to establish a common set of objectives and strategies in an Incident Action Plan (IAP). This is accomplished without losing or abdicating authority, responsibility, or accountability. UC is responsible for overall management of the incident by bringing together a single command structure thereby enhancing preparedness and response and recovery activities. UC is not a "decision by committee".

The AC adopted ICS/UC as the basic model for operating a coordinated response. Under the UC structure, federal government, state, and responsible party will each provide an IC, who will consult with each other and share decision-making authority regarding spill response and cleanup management issues. Depending on the circumstances of the incident, a local or tribal entity may

also provide an IC. Together, these ICs will jointly serve as UC. In doing so it brings together the expertise, resources, and equipment of many organizations so that the incident can be handled in the safest, quickest, and most efficient manner.

The majority of incidents typically have UC spill response from local/county response agencies, state response agencies, USCG, USEPA and responsible parties and or their representatives. Once notified (e.g., NRC, State Duty Officer, agency to agency), these responders assemble on scene, determine the extent of the incident, quickly discuss options, establish objectives, and initiate unified response strategies and tactics to mitigate the incident. This cooperative relationship has worked well over the years and is the cornerstone for response to any incident. Common sense, recognition of others statutory responsibilities, and a spirit of cooperation during an incident are paramount. In unforeseen rare situations where UC consensus is not attained, the FOSC is charged with resolving the issue. If the issue warrants, the FOSC may consult the respective RRT for guidance.

While the UC structure is an excellent vehicle (only nationally recognized vehicle) for coordination, cooperation, and communication, the duly authorized representatives must make the system work successfully. A strong command – single IC or UC, is essential to an effective response.

To be considered for inclusion as a UC representative, an organization must:

- Have jurisdictional authority or functional responsibility under law or ordinance for the incident.
- The incident or response operations must have impact on the organization's AOR.
- The organization must be specifically charged with commanding, coordinating, or managing a major aspect of the response.
- The organization must have the resources to support participation in the response.

Unified Commanders must be able to:

- Agree on incident objectives and priorities.
- Have the capability to sustain a 24 -hour- 7 day-a-week commitment to the incident.
- Have the authority to commit agency or company resources to the incident.
- Have the authority to spend agency or company funds.
- Agree on an incident response organization.
- Agree on the appropriate Command and General Staff position assignments to ensure clear direction for on-scene tactical resources.
- Commit to speak with "one voice' through the Public Information Officer (PIO) or Joint Information Center (JIC), if established
- Agree on logistical support procedures.
- Agree on cost-sharing procedures, as appropriate.

The primary objective for the UC is to "Minimize the Consequences of Pollution Incidents". Response goals, referred to as "Critical Success Factors" are noted in section 2100.1. In addition, the "Best Response Concept Doctrine" is listed in section 1620 of this plan. It identifies areas that must be done well in order to conduct a successful response.

2100.1 AREA COMMAND

The purpose of an ICS-AC is to oversee the management of an exceptionally large or highly complex incident that impacts a broad area, focusing primarily on strategic assistance and direction, and resolve competition for scarce response resources. An ICS- AC 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 ICS-AC also prioritizes incident activities, allocates or reallocates 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- specific objectives and managing incident-specific tactical operations and support. Chapter 14 of the IMH can be used to facilitate Area Command responsibilities.

2100.2 CRITICAL SUCCESS FACTORS

Response Organization

- Objectives established & communicated
- Clarity in Leadership and Responsibility at all levels
- Sufficient & efficient resources

The Natural Environment

- Source discharge minimized
- Spill effectively contained/controlled
- Sensitive areas protected
- Resources damage minimized

Public Communication

- Accurate and timely information
- Positive media coverage of response
- Positive public perception

Human Health and Safety

- No spill related public injuries, illness, or deaths

- No response worker injuries, illness, or deaths

Stakeholder Service and Support

- Minimize impact to Stakeholders
- Stakeholders well informed
- Positive meetings with Stakeholders
- Prompt handling of damage claims

2100.3 PLANNING CYCLE

The period of initial response and assessment occurs in all incidents (NCP Phase I - II). Shortterm responses (small in scope and/or duration) can be coordinated simply using the ICS 201 briefing form. More complex, longer responses will likely require the IC to identify a dedicated Planning Section Chief (PSC). The PSC must arrange for transition to the operational period planning cycle.

Planning cycle meetings are identified in detail in Chapter 3 of the IMH. The planning cycle meetings, briefings, and information ascertained during the planning cycle lead to the development of the IAP.

The IAP is a plan containing general objectives reflecting the overall strategy for managing the incident. It may include the identification of operational resources and assignments. It may also include attachments that provide direction and important information for management of the incident. The IAP guides the next operational period's operations. The IC/UC specifies the operational period duration, typically 12 or 24 hours. Short operational periods still require completion of a full planning cycle and the generation of an IAP. As conditions warrant, and the incident progresses, the UC will likely lengthen the operational period to 48/72/96 or more hours as applicable. IAP contents can be found on the USCG Homeport website. The Planning "P" represents the daily cycle of scheduled meetings and briefings. It is based upon an operational period that can be modified by the UC to meet the changing needs of a response. Further explanation of the planning cycle can be found in Chapter 3 of the USCG IMH.

2110 COMMAND REPRESENTATIVES

2110.1 INCIDENT COMMANDER

The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site. On many incidents, command is carried out by a single IC. The IC is selected based on qualifications and experience. The IC may have Deputy IC's who may be from the same agency or from an assisting agency. The Deputy IC must have the same qualifications as the IC, as they must be ready to take over that position at any time.

A typical oil or hazardous substance incident may likely begin with the local Fire Chief or County Sheriff as the IC. As the responders from the various regulatory agencies with jurisdiction arrive, these agencies will, whenever possible and practical be organized under the Unified Command Structure, which includes, but not limited to:

- The pre-designated FOSC:
  - USCG
  - USEPA
- The State On-Scene Coordinator (SOSC):
- The Local On-Scene Coordinators (LOSC):
  - Fire Chief
  - County Emergency Management Agency
  - County Sheriff
- Tribal OSC, as applicable
- Responsible Party Representatives
  - RP
  - QI
  - Spill Management Team Leader

The IC Initial Checklist is provided in the IMH as a job aid that can be used on all oil and hazardous substance incidents:

2110.2 FEDERAL ON-SCENE COORDINATOR (FOSC)

The FOSC is the pre-designated federal official responsible for ensuring immediate and effective response to a discharge or threat of discharge of oil or hazardous substance(s).

- USCG pre-designated FOSCs - In accordance with the NCP the USCG shall provide FOSCs for oil discharges, including discharges from facilities and vessels under jurisdiction of another federal agency, within or threatening the coastal zone (Great Lakes are considered in the Coastal Zone). In general the USCG Captains of the Port (COTP) shall serve as designated FOSCs for areas in the coastal zone for which an ACP is required under CWA section 311(j). The USCG shall NOT provide pre-designated FOSCs for discharges or releases from hazardous waste management facilities or similarly chronic incidents (USCG is not FOSC for remedial actions).
- USEPA pre-designated FOSCs - In accordance with the NCP the USEPA shall provide FOSCs for discharges or releases into or threatening the inland zone, and shall provide RPMs for federally funded remedial actions, except in the case of state-lead federally funded response. USEPA Regional Administrators shall designate FOSCs for areas in the inland zone for which an ACP is required under CWA section (j). USEPA will also

assume all remedial actions at National Priorities List (NPL) sites in the coastal zone, even where removals are initiated by the USCG.

- USDOD and USDOE FOSCs - In accordance with the NCP for releases of hazardous substances, pollutants, or contaminants, when the release is on, or the sole source of the release is from, any facility or vessel, including vessels bareboat-chartered and operated, under the jurisdiction, custody, or control of USDOD, USDOE, or other federal agency: (1) In the case of USDOD, or USDOE, USDOD or USDOE shall provide FOSCs/RPMs responsible for taking all response actions; and (2) In the case of a federal agency other than USEPA, USDOD, or USDOE, such agency shall provide FOSCs for all removal actions that are not emergencies and shall provide RPMs for all remedial actions.

Upon receipt of notification of a discharge or release, the FOSC is responsible for conducting a preliminary assessment to determine:

- Threat to human health and the environment.
- The responsible party and its capability to conduct the removal.
- Feasibility of a removal or the mitigation of impact.

FOSC responsibilities in the event of a discharge or release include the following:

- Notify and Coordinate with other federal, state, tribal and local agencies.
- Determine whether proper response actions have been initiated.
- Collect information:
  - Concerning the discharge or release.
  - Spill source and cause.
  - The identification of potentially responsible parties.
  - The nature, amount, location, direction, and time of discharge.
  - Pathways to human and environmental exposure.
  - Potential impact on human health, welfare, and safety, and the environment.
  - Possible impact on natural resources and property.
  - Priorities for protecting human health and welfare and the environment.
  - Estimated cost for the response. - Consult with RRT members as needed for incident specific issues.

2110.3 STATE ON-SCENE COORDINATOR

The highest-ranking, most qualified representative of the impacted Great Lakes state that will fill the role of Incident Commander on the Unified Command. In addition, his or her staff will be part of the UC response organization and will perform the following duties:

- Determine and implement appropriate response strategies in consultation with other members of the UC.
- Provide and coordinate state resources to the response effort as needed to accomplish combined cleanup objectives.
- Identify and maximize the protection of environmental sensitive areas. Determine Resources at Risk.

2110.4 LOCAL ON-SCENE COORDINATOR

The highest-ranking, most qualified representative of the local government (city, county) will fill the role of Unified Commander. The focus of local responders is usually directed toward abating immediate public safety threats. The degree of local response will depend upon the training and capabilities of local responders relative to the needs of the specific emergency.

- Determine and implement appropriate response strategies in consultation with other members of the UC.
- Provide security for all on-scene forces and equipment.
- Provide expertise and historical knowledge concerning local spill impact specifics.
- Provide expertise on local resources and equipment to mitigate the incident.

2110.5 TRIBAL ON-SCENE COORDINATOR

The United States has a unique relationship with Indian tribal governments. In treaties, the United States has guaranteed the right of Indian tribes to self-government and to exercise inherent sovereign power over their members and territory.

The Bureau of Indian Affairs (BIA) within the USDOI acts as the principal agent for the U. S. in carrying on the government-to-government relationship that exists between the U. S. and Federally recognized Indian tribes. The BIA also acts as the principal agent of the United States in carrying out the U. S. Government's responsibilities as trustee for the property it holds in trust for the benefit of federally recognized tribes.

The highest-ranking, most qualified representative will fill the role of Unified Commander if applicable. Normally, the impacted Tribe (or representative) is a designated natural resources trustee for Native American communities. Response capabilities of Tribes within this Great Lakes vary.

- Tribes with natural resources departments provide technical and scientific support.
- Determine Resources at Risk.
- Provide expertise, cultural site information and historical knowledge concerning local spill impact specifics.

2110.6 RESPONSIBLE PARTY REPRESENTATIVE

The highest-ranking, most qualified representative of the RP will fill the role of Unified Commander. In addition, his or her staff will be expected to staff part of the UC's response organization within the Operations, Planning, Logistics, and Admin/Finance sections.

As defined in OPA 90, each responsible party for a vessel or a facility from which oil is discharged, or which poses a substantial threat of a discharge, into or upon the navigable waters or adjoining shorelines or the EEZ is liable for the removal costs and damages specified in Subsection (b) of Section 1002 of OPA 90. Any removal activity undertaken by a responsible party must be consistent with the provisions of the NCP, the RCP, the ACP/GRP, and the applicable vessel/facility response plan required by OPA 90. If directed by the FOSC at any time during removal activities, the responsible party must act accordingly.

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 CERCLA (42 U.S.C. 9601 et seq.).

- The first response role of the RP is making notification of an incident to appropriate agencies and other responders in accordance with applicable laws and response plans.
- Cooperate with local public safety agencies. This includes providing full access to properties, information, and expertise of the company. The RP conducts whatever response actions are necessary and for which their personnel are trained and equipped. This can include turning valves off, plugging leaking containers, and evacuating employees. It may include firefighting by industrial fire brigades. All of these response activities are done under the direction of a public safety IC.
- Provide QI as applicable and required by, Title 33, CFR Part 155.
- Activate the facility or vessel Response Plan if applicable.
- The RP will often contract with specialized Oil Spill Removal Organizations (OSROs) to perform cleanup and mitigate a spill under the direction of the IC, UC or FOSC.
- Responsible for Natural Resource Damage Assessment NRDA in conjunction with natural resource trustees.
- Responsible for response costs and other damages caused by their spill.
- The RP should conduct inquiries into the cause of the incident. This is often done with the participation or oversight of state or federal agencies. The RP should then revise prevention, preparedness, and response measures accordingly.

2120 GUIDANCE FOR SETTING RESPONSE OBJECTIVES

IC's are responsible for providing direction and guidance to the Incident Management Team (IMT). The UC must analyze the overall requirements of the incident and determine the most appropriate direction for the management team to following during the response. This is accomplished by making key decisions, setting management team priorities, developing response objectives and assigning work tasks to primary staff within the IMT. Chapter 4 of the IMH can

be used by Command to help facilitate their responsibilities. The information/examples provided in Chapter 4 can be used as is or modified in response to specific risk applications. To aid the IC/UC, the IMH has pre- approved initial generic UC objectives under the categories of Safety, Oil Spill, Environmental, and Management.

The priorities of response objectives must be carefully considered since they vary from case to case, but generally they are as follows in accordance with the NCP:

- Safety of Life and Health
- Stabilize the Situation
- Control the source (Containment)
- Complete Notifications
- Coordinate Response Actions
- Protect Sensitive Areas
- Recover Product
- Clean Impacted Areas
- Rehabilitate Wildlife/Resources
- Customize Response Organization
- Communication Flow (Internal and External)
- Document Response

2130 GENERAL RESPONSE PRIORITIES

The first level of response will generally be the RP, local response agencies, and state response agencies when local capabilities are exceeded. When the incident response is beyond the capability of the state response, USEPA or USCG FOSCs are authorized to take response measures deemed necessary to protect the public health or welfare or the environment from discharges of oil or hazardous substances, pollutants, or contaminants. The need for a federal response is based on an evaluation by the FOSC.

Local officials are usually in command of an incident and the RP for the incident is required to cooperate with and aid the local IC or UC. In most states, the role of state agencies that respond during the early stages of an incident is to provide technical advice to local commanders as soon as possible on public safety issues. Seldom will state or federal authorities assume command from local fire or police commanders for short-term, on-site, public safety-related issues. However, on some incidents, both SOSCs and FOSCs may respond due to unique issues of the incident. An FOSC command structure is shown in the USCG IMH.

The UC structure identifying a multi-agency Type I, II, or III incident is also outlined by UC position element. The five types of incidents per ICS are:

- Type I Incident - Highly Complex National Interest (National)

- Type II Incident - Very Complex Regional to National (District)
- Type III Incident - Non-Routine Local Interest (Unit Level)
- Type IV Incident - Routine (Unit Level)
- Type V Incident - Initial (Unit Level)

2140 COMMAND POST LOCATIONS

The field location at which primary tactical-level, on-scene incident command functions are preformed. The locations of command posts vary depending on the incident type and complexity. Most require a fixed location; however some incidents require a mobile command post (remote incidents). The ICP recommendations are outlined in the individual GRPs under the Logistics Section. See: GRPs

2200 SAFETY OFFICER (SOFR)

The SOFR or Site Safety and Health Officer (SSHO) is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The SOFR will recommend measures for assuring personnel safety and assess and/or anticipate hazardous and unsafe situations. The SOFR will correct unsafe acts or conditions through the regular 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-Specific Site Safety and Health Plan (SSHP), and includes safety messages in each IAP. Only one SOFR will be assigned for each incident. The SOFR may have assistants, as necessary, and the assistants may represent assisting agencies or jurisdictions. Safety assistants may have specific responsibilities such as operations, hazardous materials, etc.

The Site Safety and Health Supervisor(s) (SSHS) or Assistant Safety Officer(s) (ASOFR) is a mandatory position under 29 CFR 1910.120. The SSHS is the individual(s) in the field responsible for enforcing the SOFRs SSHP. The SSHS must be on-site at all times while the SOFR may be at other locations.
As determined by the scale of the operation, federal and/or state Occupational Safety and Health Administration (OSHA) compliance officers may be on-scene. They will be consulted to determine applicability of OSHA regulations. They will also assess the safety posture and procedures of the response organization. They will also recommend/ order changes as appropriate after consultation with the SOFR. Other duties include, but may not be limited to the following:

- Oversee all safety matters for entire response organization. Coordinate changes in procedure with FOSC.
- Ensure response operations are being conducted in accordance with all federal, state, and local safety regulations or guidelines.
- Review and approve all SSHP prepared by contracted site safety supervisors.
- Ensure all field level personnel are properly equipped with necessary safety equipment.

- Liaison with federal and state OSHA representatives.

Additional information regarding this position under ICS can be found in Chapter 6 of the USCG IMH. See 9700 Section for example Site Safety Plans.

2200.1 U.S. AND STATE OSHA REPRESENTATIVES

The OSHA conducts safety and health inspections of hazardous waste sites to ensure employees are protected and to determine compliance with its regulations. OSHA will provide the FOSC with advice, guidance, and assistance regarding hazards to persons involved in removal or control of oil or chemical spills and precautions necessary to prevent endangerment of their health and safety. The assigned SOFR should establish communication with OSHA representative at the beginning stages of a medium or large spill.

2210 SITE CHARACTERIZATION

Site Characterization information is listed in the Hazardous Substance Annex.

2220 SITE SAFETY PLAN DEVELOPMENT

Sample Site Safety Plans can be found on the USCG Homeport website.

2300 PUBLIC INFORMATION OFFICER

The PIO is a key staff member supporting the incident command structure. The PIO represents and advises IC/UC on all public information matters relating to the management of the incident. The PIO handles media and public inquires, emergency public information and warnings, rumor monitoring and response, media monitoring, and other functions required to coordinate, clear with appropriate authorities, and disseminate accurate and timely information related to the incident particularly regarding information on public health and safety and protection.

The PIO is responsible for developing and releasing information about the incident to the media, to incident personnel, and to other appropriate agencies and organizations. Only one primary PIO will be assigned for each incident, including incidents operation under UC and multijurisdictional incidents. The PIO may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions. Agencies have different policies and procedures relative to handling of public information. Duties include:

- Determine from the IC/UC if there are any limits on information release.
- Develop material for use in media briefings.
- Obtain IC/UC approval of media releases.
- Inform media and conduct media briefings.
- Locate a suitable location for media briefings.

- Manage the JIC if established.
- Brief Command on PIO issues and concerns.

In accordance with the NCP, when an incident occurs, it is imperative to give the public prompt, accurate information on the nature of the incident and actions underway to mitigate the damage. FOSCs/RPMs 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.

In accordance with the NCP, in the case of all CERCLA removal or enforcement actions a spokesperson shall be designated by the lead agency. The spokesperson shall inform the community of actions taken, respond to inquiries, and provide information concerning the release. All news releases or statements made by participating agencies shall be coordinated with the FOSC/RPM. The spokesperson shall notify, at minimum, immediately affected citizens, state and local officials, and, when appropriate, civil defense or emergency management agencies.

The PIO must ensure on-scene conferences or briefings are carefully coordinated to ensure efforts to control the incident site are not disrupted or inadvertently place media personnel in harm's way. For press briefings, efforts should be made to find a location that provides convenient access for federal, state, tribal and local officials and is large enough to accommodate the anticipated number of media personnel.

Members of the media may also approach personnel at an incident site. They should be referred to the PIO and follow the incident/agency policies and procedures of the IC/UC through the PIO. Agency representatives on scene may answer questions regarding their particular role.

Additional information regarding this position under ICS can be found in Chapter 6 of the USCG IMH.

2310 PROTOCOL FOR ACCESS/TIMING OF MEDIA BRIEFINGS

The question of media access to spill sites may arise during emergencies. In general, it should be the UC's policy to allow media access when public resources are concerned, with reasonable guidelines to protect personal safety and preclude interference with response activities.

The PIO must work through and seek permission from the UC before allowing media access to the emergency scene or ICP. The PIO should obtain permission and legal counsel before releasing photos or video footage on private property, both for purposes of conserving legal evidence and potential violation of owners' rights.

The general public's opinion of response efforts is not always based upon what action has been taken, but upon what information they received. Supplying information to the media is a critical

component of spill response and is a primary function of the FOSC. Early and accurate news releases serve to minimize public apprehension and to enhance their faith in the response community. The NRT provides Risk Communication guidance for Oil Spill Response and additional information regarding risk communications at https://www.nrt.org/.

The following general guidelines are provided:

- Timely and accurate information should be provided to protect public health and obtain public cooperation, and to assist in guarding against further environmental damage.
- Clear communication by spill response authorities is essential for the delivery of accurate information to avert misinformation or rumors sometimes engendered by an emergency.
- The FOSC must immediately establish and maintain his/her position as chief articulator of an incident. It is the FOSCs and SOSCs role - not the role of the spiller or others-to deliver public statements regarding the effects of a spill, including evaluations of a spill's size, extent, nature, dangers to public health or resources, details of the response plan, the FOSCs expectations for response plan implementation, degree of success or lack of success of a spill response, and the anticipated long-term effects of a spill.
- When a spill occurs, the FOSC must immediately open communications with local government officials of affected communities, conveying facts needed by residents for their own response activities and protection of public health and resources. Initial phone calls to establish communication channels with local governments and appropriate organizations, such as fishermen and native groups, should be followed by regular updates through spill bulletins, press releases, and briefings.

2310.1 DAILY PRESS BRIEFINGS

During a significant spill with a rapidly developing situation and presence of a large number of reporters, a briefing held daily at a pre-established time (10:00 am and/or 3:00 pm is recommended) is one of the most useful means of delivering information. This is an opportunity for the FOSC and other spokespersons to brief the press and answer their questions, and for other key staff members to follow up with important data. For example, if applicable, natural resource managers should present information on wildlife and fisheries impacts or public health authorities may offer their findings on contamination of local subsistence foods. It is the PIO's duty to work with the FOSC to prioritize information according to importance, point out backup factual material and other sources, provide written information for distribution, and conduct the press briefing. Early morning is the best part of the day for the PIO to coordinate the day's press activities and ensure everyone receives written information and background facts. These press briefings may relieve the FOSC and other spokespersons of some of the pressure of interviews throughout the remainder of the day, as well as free reporters to proceed with fieldwork.

2310.2 NEWS RELEASES/PRESS RELEASES/FACT SHEETS

News releases should be reserved for announcements of major decisions, policy changes, or new developments. They must report on items that are actually news, should summarize issues

clearly, and provide quotes from decision-makers that encapsulate and clarify the UC's position. Distribution should be to affected communities and response agencies in addition to the media. Fact sheets should be prepared and updated regularly to present key data needed by the press or public, such as amounts of oil or hazardous substance spilled or cleaned up, or wildlife mortalities. If operations permit, these sheets should be reviewed by applicable sections prior to release. The PIO can be used to facilitate this process. Background papers should be written to amplify and clarify complex issues and the UC's related actions and policies. A press release should tell the who, what, when, where and how of an incident. Once these basic elements are developed, the press release should address items of specific concern to the media and public.

Incident News (http://incidentnews.noaa.gov/) is a website that is maintained by the Emergency Response Division, Office of Response and Restoration, NOAA, in support of the USCG. This site contains information provided and approved by the UC for specific spill incidents. Information is posted on the site as it becomes available. The timing of updates depends on the nature of each spill and resources available to post the material. The date of updates is noted on each page. During rapidly-evolving events, the site might be updated several times per day. In the later phases of a response, the site might be updated once per week.

2310.3 SOCIAL MEDIA IN A RESPONSE

For smaller Coast Guard cases - like a minor pollution response, local SAR case or maritime event – Area, Districts, Sectors and units should collaborate to use pre-existing Coast Guard social media sites to communicate as outlined in the Coast Guard External Affairs Manual.

For the use of social media in a USCG-led crisis/response, reference the Social Media Field Guide, a compliment to the National Response Team Joint Information Center (NRT JIC) Model.

2320 JOINT INFORMATION CENTER

A JIC is a physical location where personnel with public information responsibilities from organizations involved in incident management activities can co-locate to perform critical emergency information, crisis communications, and public-affairs functions. Typically an incident specific JIC is established at a single, on-scene location, in coordination with federal, state, tribal and local agencies depending on requirements of the incident. An incident specific JIC develops, coordinates, and disseminates unified news releases. News releases are cleared through IC/UC, to ensure consistent messages, avoid release of conflicting information, and prevent negative impact on operations. A JIC may be established within or near the ICP where the PIO and staff can coordinate and provide information on the incident to the public, media, and other agencies.

During a major oil spill, hazardous substance response or marine disaster where media activity is expected to last several days, the UC should establish a JIC to coordinate public affairs activities

of participating agencies and parties. It is established to handle the joint public information needs of all groups participating in the response.

The role of the JIC includes:

- Providing multiple phone lines for incoming calls, manned by knowledgeable individuals.
- Ensuring state/federal government public affairs representatives are available to the media.
- Issuing press releases to the media and providing copies to response officials.
- Scheduling and coordinating news conferences and media briefings.
- Providing the RP an opportunity to coordinate their media efforts with those of the FOSC.
- The JIC will only issue "official" releases approved by the FOSC in consultation with the other UC's. Individual groups or agencies may issue releases from this Center provided that it is on own agency letterhead and stated that it is not a JIC release.

2330 RISK COMMUNICATION

Risk communication is maximizing public safety by presenting information to the public in a timely and professional manner during emergency situations. Maximum cooperation is needed from the public to ensure safe response efforts. Today, ICs have responsibility to communicate risks to the public concerned with terrorism, homeland security, environmental disasters, and other events. The UC is the trusted specialist the public is looking for to answer and address questions and concerns.

Examples of situations involving risk communication include, but are not limited to the following:

- Alerts (severe weather, maritime security level changes)
- Disease outbreaks
- Hazardous material releases
- Toxic contamination
- Major bridge or building collapse
- Terrorist attack

Three equations resulting in successful Risk Communication:

- Perception equals reality
- Goal equals trust and credibility
- Communication equals skill

2330.1 COMMUNICATING RISKS DURING THE INITIAL PHASE (FIRST 24 HOURS)

Work with the LOFR to identify stakeholders listed in the GRPs. Examples of stakeholders include, but are not limited to the following:

- USEPA
- Mariners Advisory Committee
- Facility managers
- Vessels agents
- Other agencies specifically involved in an incident/event

Get the word out in emergency situations through widespread distribution of material to ensure effective communication (press releases, Marine Safety Information Bulletins/Broadcast Notice to Mariners, press conferences, public meetings)

During an initial response, first responders may need to brief the public on inherent safety concerns. Prepare, review, remain calm and know your audience.

2330.2 COMMUNICATING RISKS DURING THE PROJECT PHASE (BEYOND 24 HOURS)

Develop a plan of action by working with stakeholders and LOFR to organize and disseminate information to the public. Use the following checklist to prepare for a speaking engagement:

- Time, Place and Date of public appearance
- Incident/Event name: Time Place and Date of Incident/Event
- Introduction: statement of personal concern, statement of organization commitment, and purpose and plan for the meeting
- Key messages: supporting data of the Incident specifically impacting the public
- Public involvement: names and concerns of who are helping, the organizations they represent, and their specific area of responsibility (if a volunteer group has been set up now is a good time to mention how the community can get involved). Let the public know what they can do to help (whether that is evacuating, staying indoors, or reporting suspicious activity)
- Conclusion: summary statement
- Questions and answers: practice anticipated questions and responses • Presentation material: handouts, audios, etc.

2340 MEDIA CONTACTS

Descriptions and contact information for local, state and tribal newspapers, television stations and radio stations can be found in each GRP. [Link to GRPs]

2400 LIAISON OFFICER

Incidents that are multi-jurisdictional, or have several agencies involved, may require the establishment of a LOFR position. Only one primary LOFR will be assigned for each incident, including incidents operating under UC and multi-jurisdiction incidents. The LOFR may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions. The LOFR is assigned to the incident to be the point of contact for assisting and or cooperating agency representatives. Duties include:

- Serve as the initial point of contact for participating federal, state, tribal and local agencies with a vested interest in the response.
- Assist in establishing and coordinating interagency contacts.
- Coordinate activities of visiting dignitaries.
- Maintain a spill response summary distribution list for public and private entities requesting spill response status reports.
- Receive and coordinate all calls from public and private entities offering assistance or requesting information.
- Monitor incident operations to identify current or potential inter-organizational problems.
- Identify public and private concerns related to the status and effectiveness of the spill response.
- Brief IC/UC on agency issues and concerns.

Additional information regarding this position can be found in Chapter 6 of the USCG IMH.

2410 TRUSTEES

The NCP designates trustees who are to act on behalf of the public as trustees for natural resources and outlines the responsibilities of those trustees.

40 CFR 300 Trustees for Natural Resources designation and responsibilities.

In 1990, Congress enacted OPA 90, 33 USC 2701, et seq. OPA 90 authorizes the following natural resource trustees:

- Secretary, USDA
- Secretary, USDOC
- Secretary, USDOD
- Secretary, USDOE

- Secretary, USDOI
- Leader(s) of state resource agencies (designated by the governor of each state)
- Leader(s) of federally-recognized Indian tribes (designated by the governing body of any Indian tribe)
- Leaders of foreign government resource agencies (designated by the head of any foreign government)

To seek compensation for injuries to natural resources caused by the discharge of oil. For purposes of this document, these groups are referred to as either "trustees" or trustee agencies. The Lead State Trustee generally is selected based upon the types of natural resources affected by the spill.

2410.1 NOTIFICATION OF USDOI

The USDOI Regional Environmental Officer for Regions II, III and V must be contacted in the following circumstances:

- All reported oil discharges that equal or exceed 5,000 gallons in the Great Lakes.
- All reported releases of hazardous substances that exceed the reportable quantity (RQ) in the Great Lakes.
- All reported discharges or releases of hazardous substances of any size that may affect USDOI administered facilities or National Wildlife Refuge System as well as any Indian Reservation.
- All reported discharges or releases of any size that have impacted or threaten populations of federally listed species or designated critical habitats protected under the ESA.
- All reported discharges or releases of any sizes that have impacted or threaten "historic properties" protected under the NHPA.
- All reported discharges or releases of any size that have resulted in fish kills or have impacted migratory birds.

2410.2 NATURAL RESOURCE DAMAGE ASSESSMENT AND RESTORATION (NRDAR)

The overall goals of the NRDAR process are to restore the injured natural resources to pre-spill conditions and to obtain compensation for all documented losses of natural resources and services that occur between the spill and the return to baseline (pre-spill) conditions. In general, the NRDAR process may require several phases to complete, including individual phases of documenting injuries, assessing damages, settling claims, and undertaking restoration programs. This document addresses the NRDAR process only during initial stages while response efforts are underway. This document attempts to describe the NRDAR process, identify principle participants in NRDAR activities, and clarify the relationship of NRDAR to ICS. NRDAR is separate from the response and is not part of the ICS. However, and as mentioned in the previous section, the FLAT coordinate the NRDAR process with the LOFR in ICS in order to

minimize interference, share resources and information and avoid duplication of effort. This information provided here is to allow an RP to understand the NRDAR process. Additional information is provided concerning funding for NRDAR activities and the requirements for specific federal, state, and local permits necessary to collect information for assessments of natural resource damages.

2410.3 NRDAR REPRESENTATIVES

The NRDAR Representatives are responsible for coordinating NRDAR needs and activities of the trustee team. NRDAR activities do not occur within the structure, processes, and control of ICS. However, in the early phases of a spill response, NRDAR activities may overlap with environmental assessment activities. Since NRDAR is carried out by natural resource trust agencies and/or their contractors, personnel limitations may require staff to perform both NRDAR and response activities simultaneously. Therefore, NRDAR representatives should remain coordinated with the spill response organization through the LOFR, and may need to work directly with the IC/UC, Planning Section, Operations Section, and the NOAA SSC to resolve any problems or address areas of overlap. This includes close coordination with the LOFR for obtaining timely information on the spill and injuries to natural resources. While NRDAR resource requirements and costs may fall outside the responsibility of the Logistics and Finance/Admin Sections, coordination is important. The NRDAR Representatives will coordinate NRDAR or injury determination activities. The Federal Lead Administrative Trustee (FLAT) (see Section 2410.5) should:

- Attend appropriate planning meetings to facilitate communication between NRDAR Team and IC/UC.
- Provide status reports.
- Coordinate with the LOFR or IC/UC in absence of an LOFR, to assure that NRDAR field activities do not conflict with response activities and to request logistical support for NRDAR field activities.
- Seek FOSCs cooperation in acquiring response-related samples or results of sample analysis applicable to NRDAR; (e.g., spilled petroleum product from source and/or oil from contaminated wildlife).
- Support IC/UC information needs through the PIO.
- Interact with appropriate units to collect information requested by the NRDAR team.
- Obtain necessary safety clearances for access to sampling sites.
- Coordinate with other organizations to identify personnel available for NRDAR.
- Identify site access, transportation support, logistics requirements and staffing needs to the proper ICS elements.

2410.4 NOTIFICATION PROCEDURE FOR INITIATING NRDAR ACTIONS

In the event of an oil or hazardous substances spill, the FOSC shall ensure that potentially affected federal, state, tribal and foreign natural resource trustee representatives are promptly

notified by telephone. Prompt notification pursuant to the NCP enables the trustees to quickly initiate a NRDAR for the purpose of restoring natural resources and lost uses to pre-spill conditions. [See GRPs] [Link to RRT contact list]

It is highly desirable for natural resource trustees to coordinate their NRDAR activities and to consult with local governments and interest groups from the affected area to produce a single NRDAR for all injuries to public trust resources. The trustees are encouraged to coordinate these activities with the efforts of cooperative RP to the extent that trustee responsibilities are not compromised.

2410.5 IDENTIFICATION OF FEDERAL AND INCIDENT LEAD ADMINISTRATIVE TRUSTEE

Executive Order 12777 (October 22, 1991) requires the federal natural resource trustees to select a representative as the FLAT. In general, the FLAT serves as the federal contact for all aspects related to damage assessment, resource restoration, and federal funding for NRDAR activities. Depending on the resources affected and other relevant factors, it might be appropriate for most administrative duties to be undertaken by a lead trustee from a non-federal agency. In such cases, a FLAT would still be selected to work with the representatives of the OSLTF to secure federal funds to initiate the damage assessment. All other administrative duties regarding damage assessment activities would be coordinated by the non-federal lead trustees. This lead trustee or trustee agency shall be selected by consensus of all participating trustees. The trustees will notify the USCG of the FLAT selection and, when appropriate, non-federal lead trustee as soon as possible after an oil spill.

2410.6 NRDAR AND ICS

One objective of ICS is to reduce or eliminate duplication of efforts by numerous response agencies, while attempting to control or contain the spill and mitigate possible impacts of spilled oil. A small group consisting of the FOSC, SOSC, local IC, and a representative of the RP from the UC, and coordinates and directs the actions of the response.

Concerns of affected local governments related to spill response or cleanup are generally presented to the UC through a Multi-Agency Coordination (MAC) group representative. The local government claims for spill damages associated with services provided by natural resources should be coordinated with the Trustee NRDAR Team to avoid overlap within assessments.

Assessment of injuries and damages resulting from spilled oil need to begin as soon as possible following initial release of a pollutant. This necessitates that NRDAR activities be conducted simultaneously with response efforts and coordinated through the UC. Portions of the NRDAR process should be aligned with ICS to improve communication, expedite both response and NRDAR activities, and make efficient use of personnel and equipment. To avoid potential conflicts in duties, it is recommended that members of the NRDAR Team not have responsibilities for spill cleanup or general response activities.

The primary role of the NRDAR Team is to document a pathway for the spilled oil, measure levels of injuries resulting from the spill, and determine damages. The UC, in contrast to the NRDAR Team, focuses primarily on response, cleanup, and minimizing impacts of the oil spill. Although the UC and NRDAR Team often have different responsibilities and needs, some of their activities overlap and require coordination. Examples of activities to be coordinated immediately following a spill include collecting samples (e.g. access to restricted sites, sampling prior to changes to natural resources, using equipment (boats, helicopters, etc.), communications, surveying spill sites, identification of protective measures and potential need for emergency restoration.

Uninterrupted communication between the UC and the NRDAR Team is essential to ensure that needs and efforts of the NRDAR Team are not in conflict with response strategies and activities selected by the UC. Information concerning, for example, the spill trajectory forecasts, cleanup strategies, and beach and port closures should be made available to the NRDAR Team to assist sample and data collection in a timely fashion. Conversely, information concerning potential injuries to natural resources caused by oiling or response techniques should be made available to the Planning Section before implementation of cleanup responses by the Operations Section.

It is important to note that the RP is part of the UC but may not necessarily be part of the trustees' coordinated NRDAR activities. For this reason, the NRDAR Team must remain separate from ICS to ensure that statutory responsibilities of the trustees are not compromised. The trustees retain the option of inviting the RP to participate in all or part of the damage assessment process. Some NRDAR activities, however, are best coordinated with the UC. The NRDAR Team will provide an agency Representative(s) (AREP) to the LOFR of ICS to present the needs of the NRDAR Team and other response information to the incident command. The NRDAR Representative(s) will also act as historian or recorder of information critical for an accurate assessment of spill damages and will attend appropriate incident command meetings to secure knowledge of the up-to-date response activities.

Additional information regarding this position can be found in the USCG [IMH] and the [NPFC User Reference Guide].

2420 INVESTIGATORS

Investigators from federal, state, and local agencies will not formally be a part of ICS. While investigation personnel may report to individuals who are part of the IC/UC, investigators should be separate so as not to introduce polarizing forces into the UC System. The initial point of contact shall be the LOFR.

2430 AGENCY REPRESENTATIVES (AREP)

In many multi-jurisdiction incidents, an agency or jurisdiction may send an AREP who is not on direct tactical assignment, but is there to assist in coordination efforts. An AREP is an individual assigned to an incident from an assisting or cooperating agency who has been delegated authority

to make decisions on matters affecting that agency's participation at the incident. AREPs report to the LOFR or to the IC/UC in the absence of the LOFR. AREPs should:

- Ensure that all agency resources are properly checked in at the incident.
- Attend briefings and planning meetings as required.
- Provide input on the use of agency resources unless resource Technical Specialists are assigned from the agency.
- Cooperate fully with the IC/UC and the General Staff on agency involvement at the incident.
- Ensure the well-being of agency personnel assigned to the incident.
- Advise the LOFR of any special agency needs or requirements.
- Report to home agency dispatch or headquarters on a pre-arranged schedule.
- Ensure all agency personnel/equip are properly accounted for prior to departure.
- Ensure all required agency form, reports, and documents are completed prior to Demob.
- Have a debriefing session with the LOFR or IC/UC before demobilizing.

Additional information regarding this position under ICS can be found in Chapter 6 of the USCG IMH.

2440 U.S. COAST GUARD INTERNATIONAL COORDINATING OFFICER (ICO)

Act as coordinator between ICP in U.S. and Canada. Communicate and coordinate planned response actions between both Command Posts. Guidance for this can be found in the [CANUSLAK Annex].

2450 STAKEHOLDERS

Stakeholders are any person, group, or organization affected by and having a vested interest in the incident and/or the response operation. Oil spill and hazardous substance response stakeholders include environmental, economic, and political stakeholders. Stakeholder listings are captured throughout this Plan (local, state, tribal, federal, NRDAR, volunteers, etc).

2500 INTELLIGENCE OFFICER (INTO)

The analysis and sharing of information and intelligence are important elements of ICS. The INTO has the responsibility to provide command intelligence information that can have a direct impact on the safety of response personnel and influence the disposition of maritime security assets involved in the response. In this context, intelligence includes not only national security or other types of classified information, but also other operational information such as risk assignments, weather information, geospatial data, structural designs, toxic contaminant levels, and utilities and public works data that may come from a variety of different sources.

Information and Intelligence must be appropriately analyzed and shared with personnel, designated by the IC/UC, who have a "need-to-know" to ensure they support decision-making.

Within IC/UC the Intelligence position can be a General Staff position or an Intelligence Unit or Intelligence Technical Specialist under the direction of the PSC or Intelligence Group under the direction of the FOSC.

Regardless of how it is organized, the information and intelligence function is responsible for developing, implementing, and managing information-related security plans and operations as directed by the IC/UC. These can include information security and operational security activities, as well as the complex task of ensuring sensitive information of all types (e.g., classified information, sensitive security information (SSI), sensitive law enforcement information, proprietary and personal information, or export- controlled information) is handled in a way that not only safeguards information but also ensures it gets to those who need access to it so they can effectively and safely conduct their missions. The information and intelligence function also has the responsibility for coordinating information-security and operational security matters with public awareness activities that fall under the responsibility of the PIO, particularly where such public awareness activities may affect information or operation security.

The INTO has the following responsibilities:

- Collect and analyze incoming intelligence information from all sources.
- Determine the applicability, significance and reliability of incoming intelligence information.
- As requested, provide intelligence briefing to the IC/UC.
- Provide Intelligence briefings in support of the ICS Planning Cycle.
- Provide Situation Unit with periodic updates of intelligence issues that impact the incident response.
- Review IAP for intelligence implications.
- Supervise, coordinate, and participate in the collection, analysis, processing, and disseminate of intelligence.
- Establish liaison with all participating law enforcement agencies including the CGIS, FBI/JTTF, State and Local police departments.
- Prepare all required intelligence reports and plans.
- As the incident dictates, determine the need to implant Intelligence Technical Specialists in the Operations or Planning Sections.

Additional information regarding this position under ICS can be found in Chapter 9 of the USCG IMH.

2510 AGENCIES THAT MAY SUPPORT THE INTELLIGENCE OFFICER

The following agencies may support the Intelligence Officer:

- USCG Field Intelligence Support Team (FIST)
- FBI Field Intelligence Group (FIG)
- State Police Intel
- USICE (Intel Analysts
- USCBP (Analysts)

3000 OPERATIONS

3010 THE OPERATIONS SECTION ORGANIZATION

The Operations organization is designed to be highly flexible so that it can be used during any type of emergency. Unlike the other Sections in the ICS organization, Operations builds from the bottom up, only adding layers of management to maintain span of control when the size of the Operations Section requires more focused oversight.

3020 INITIAL RESPONSE ACTIONS OF THE OPERATIONS SECTION CHIEF

Typically, the first responder will act in the capacity of both initial IC and as OSC. As OSC, there are several key actions you must undertake to ensure operations are properly managed.

These actions include:

- Conducting an initial assessment of the situation to determine:
  - Incident Priorities: (Oil Spill Example) - Safeguard Environment (Note: this information can also be taken from ICS 201 or obtained through discussion with IC)
- Strategic Priorities, examples:
  - Contain the source
  - Remove oil from water surface
  - Protect environmental areas
  - Recover oil from impacted shoreline
  - Make tactical decisions
  - Review excerpts from the ACP/GRP to validate tactical decisions.
- Conduct an operational risk assessment on each tactical decision to evaluate safety concerns using either:
  - Green/Amber/Red (GAR) Model
  - Operational Hazard Work Sheet
- Begin building the Operations Section around tactical decisions to assign Team Leaders, Group Supervisors, and Branch Directors and to formalize the communications chain

(see section below: Consideration for organizing the Operations Section). Later on, this organization may change during the ICS Tactics Meeting.

- Document actions taken on an ICS-201, Incident Briefing Form.

The OSCs information on the ICS-201 should include:

- Operations organization
- Resources on scene
- Resources ordered
- Initial tactical actions
- Maintain an ICS-214, Unit Log

3100 OPERATIONS SECTION ORGANIZATION

The Operations Section is responsible for all operations directly applicable to the primary mission. The Operations Section is responsible for developing detailed operational plans with representatives from federal, state, tribal, local and RP organizations based on UC objectives. The Operations Section collects information from field level sources, assessing the situation, communicates with and makes recommendations to the UC.

3100.1 ORGANIZATION OPTIONS

Additional organization options are listed in Chapter 20 of the IMH. An organizational chart of the Operations Section and its subordinate units is listed. It serves as an example and is not meant to be all-inclusive. The functions of the Operations Section must be accomplished during an incident; however, they can be performed by one individual or can be expanded, as needed, into additional organizational units with appropriate delegation of authority. A brief description of each position is provided in the subsequent pages.

The Operations Section and the OSC in particular, works together with the Planning Section, following the Planning P to help generate the IAP, which identifies the operational tactics and strategies to support and mitigate the incident.

3100.2 SPECIAL TEAMS

Some of the special teams that may be requested to provide support during a salvage operation include:

- USCG Atlantic Strike Team (AST)
- Marine Safety Center - Salvage Emergency Response Team • Navy Supervisor of Salvage and Diving (SUPSALV)
  [See NAVSUPSALV example request message Section 9745]
- USACOE

- American Salvage Association

[See Special Teams Manual in 9700 Section]
[See Chaffey Amendment in 9700 Section]

3110 OPERATIONS SECTION CHIEF

The OSC is responsible for the management of all tactical operations directly applicable to the primary mission. The OSC will normally be selected from the organization/agency with the most jurisdictional responsibility for the incident. The OSC activates and supervises organization elements in accordance with the IAP and directs its execution. The OSC also directs preparation of operational plans; requests or releases resources, monitors operational progress and makes expedient changes to the IAP as necessary; and reports such to the IC. The OSC may have Deputy OSCs who may be from the same agency or from an assisting agency. The Deputy OSC must have the same qualifications as the person for whom they work, as they must be ready to take over the position at any time. Duties include:

- Evaluate and request sufficient Section supervisory staffing for both operational and planning activities.
- Supervise Operation Section field personnel.
- Implement the IAP for the Operations Section.
- Evaluate on-scene operations and make adjustments to organization, strategies, tactics, and resources as necessary.
- Ensure the Operations Section personnel execute work assignments following approved safety practices.
- Assemble/disassemble task force, strike teams as appropriate.
- Identify utilize staging areas.
- Evaluate and monitor current situation for use in next operational period planning.
- Convert operational incident objectives into strategic and tactical options.
- Coordinate and consult with PSC, SOFR, technical specialists, modeling scenarios, trajectories, etc., on selection of appropriate strategies and tactics to accomplish objectives.
- Identify kind and number of resources required to support selected strategies.
- Develop work assignments and allocate tactical resources based on strategic requirements.
- Participate in the planning process and the development of the tactical portions of the IAP.
- Develop recommended Demob list and receive and implement applicable sections of the Demob plan.

Additional information regarding this position can be found in Chapter 7 of the USCG IMH.

3110.1 FORECASTED OPERATIONS INCIDENT ACTION TIMELINES

Position specific job aids can be found on the USCG Homeport webpage. The OSC Job Aid contains useful references and checklists related to incident action timelines.

3200 RECOVERY AND PROTECTION BRANCH

The Recovery and Protection Branch is responsible for overseeing and implementing protection, containment and cleanup activities established in the IAP. Because this branch is so diverse in its operations, it may be divided into the following groups:

- Protection Group
- On Water Recovery Group
- Shoreside Recovery Group
- Disposal Group
- Decontamination Group Additional information regarding this position can be

found Chapter 20 of the USCG IMH.

3210 PROTECTION GROUP

The Protection Group is responsible for the proper deployment of containment, diversion, exclusion and sorbent boom/materials in designated locations and implements proper cleanup methods using the following guidelines:

- Ensure proper protection strategies are in place with proper deployment of diversion and exclusion booming techniques. Continue to evaluate booming strategies.
- Ensure cleanup methods are appropriate for area being cleaned. Consult the Environmentally Sensitive Index (ESI) listing (NOAA & USEPA sensitivity atlases) and input from the Trustees.
- Do not conduct cleanup with methods that cause more damage than the oil that would have been removed.
- Ensure workers know what to look out for, avoid, or protect.
- If dispersants, burning, or use of other chemicals is a viable option, seek approval and plan logistics early.
- Each incident is different and may require extensive research to determine the appropriate cleanup method(s). All available resource information should be used to determine what is appropriate. These include, but are not limited to, Scientific Support Coordinator (SSC), AST, State Trustee resources, and Manufacturer and/ or users of the chemical involved.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3210.1 CONTAINMENT AND PROTECTION OPTIONS

See the GRPs for detailed containment and protection options.

3220 ON WATER RECOVERY GROUP

The On Water Recovery Group is responsible for managing on water recovery operations in compliance with the IAP. The Group may be divided into Strike Teams, Task Forces, and Single Resources. Duties include:

- Direct, coordinate and assess effectiveness of on water recovery actions.
- Modify protective actions as needed.
- Direct the delivery, deployment and operation of skimmers
- Provide a field status of skimming operations to the OSC.
- Maintain estimates of recovered product.
- Identify resource support needs.
- Ensure recovery and temporary storage systems are adequate and operate properly.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3220.1 RECOVERY OPTIONS

On water recovery options will likely include Spilled Oil Recovery System (SORS), small boat skimming systems and sorbent materials. See the GRPs for a listing of oil spill recovery options within the AOR.

3220.2 TEMPORARY STORAGE

Storage of recovered oil during on water recovery operations will likely consist of tankage on board recovery vessels, oil bladders (dracones, sea slugs, etc), and 55 gallon drums to small portable tanks. Oil contaminated debris collected on water can be placed in containers which should be lined to prevent further contamination. The Oil Spill Removal Organization (OSRO) will likely be tasked with ensuring proper temporary storage is available for and during recovery operations.

3230 SHORESIDE RECOVERY GROUP

The Shoreside Recovery Group is responsible for managing shoreside cleanup operations in compliance with the IAP. Duties include:

- Direct, coordinate and assess effectiveness of shoreside recovery actions.

- Modify protective actions as needed.
- Report on the efficiency of Shoreside recovery and cleanup methods.
- Ensure adequate and proper temporary storage is in place.
- Identify resource support needs.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3230.1 SHORELINE CLEANUP OPTIONS

Shoreline Cleanup Options include No Action, Passive Cleanup (sorbent materials) Operations, Manual Cleanup operations, Mechanical Cleanup operations and alternative countermeasures. See Great Lakes Shoreline Cleanup Guidelines listing pre-approved specific RRT Region cleanup guidelines. These guidelines identify the cleanup objective, cleanup description, applicable shoreline types, when to use the cleanup option, biological constraints, and environmental effects.

3230.2 PRE-BEACH CLEANUP

Pre-beach cleanup should be evaluated and conducted if deemed necessary. Pre-beach cleanup will likely include removal of debris, trash, and the like, prior to impact, in an effort to limit the amount of contamination requiring proper disposal. Pre-beach cleanup can be a very effective way to lessen disposal volume.

3230.3 STORAGE REQUIREMENTS

Adequate and proper storage is necessary to enable oily debris to be collected safely and securely at the spill location or sites. Storage can be limited to a few 55 gallon drums or can be tank trucks, baker tanks, or small to large storage tanks. It is essential that the storage device be compatible for the recovered material and meet USDOT and/or USEPA requirements as applicable. Roll on/off dumpsters can be used to collect large amounts of oil contaminated debris, while salvage drums can be used for smaller quantities. It is essential that the dumpster or similar storage device be lined with plastic material to prevent further contamination and leakage.

3240 DISPOSAL GROUP

The Disposal Group is responsible for coordinating onsite activities of personnel engaged in collecting, storing, transporting, and disposing of waste materials. Depending on the size and location of the spill, disposal groups may be further divided into teams, task forces, and single resources. Duties include:

- Direct the collection, temporary storage, transportation, recycling, and proper disposal of recovered wastes.
- Manage temporary storage sites and prevent secondary discharges or cross contamination.

- Ensure compliance with all hazardous waste laws and regulations, specifically RCRA requirements.
- Confirm laboratory waste characterization results and prepare RCRA manifests as required. Note: Ensure a HAZARDOUS WASTE MANIFEST is generated for disposals involving 5 gallons or more of petroleum products as dictated USEPA (RCRA Hot Line 1-800-424-9346). Disposals of less than 5 gallons or 50 lbs. must comply with RCRA but may not require a manifest.
- Maintain accurate records of recovered material.
- The FOSC will ensure that all wastes generated will be adequately characterized and appropriate disposal will be arranged, regardless of whether it is a federal or RP lead incident.
- Determine temporary and ultimate disposal sites as appropriate. Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3240.1 WASTE MANAGEMENT AND TEMPORARY STORAGE OPTIONS

A waste is any solid, liquid, or contained gaseous material that is not of any further use, and either is recycled or thrown away. According to RCRA, a hazardous waste is a waste that because of its quantity, concentration, or physical, chemical, or infectious characteristic, it may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or pose a substantial hazard or potential hazard to human health and the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. A hazardous waste also must be a "solid waste" as defined in RCRA as "garbage, refuse, or sludge or any other water material." A solid waste can be a solid, semisolid, a liquid, or a contained gas. Presently there are two ways a material may be classified as a "hazardous waste". If the waste is "Listed" under RCRA regulations (40 CFR 261.20 – 261.24) or if it has one of the following four characteristics: ignitability, corrosivity, reactivity, and toxicity, as listed in 40 CFR 261.

Any discussion of the disposal of oil or hazardous material recovered during clean-up of a discharge or release in the Great Lakes Zone must first recognize the location of the removal site will play a major role in the disposal method decision-making process. In addition, each of the eight states within the zone has its own state laws and regulations. Therefore, each incident will be unique and only generalities can be made concerning some aspects of disposal. In the interest of conservation, individual state laws will not be repeated in this plan.

3240.2 DECANTING POLICY

Large quantities of oily-water/fluids are typically generated during an oil spill response, as a result of skimming and vacuuming operations. These collected fluids consist mostly of water with suspended hydrocarbons that eventually float to the surface. 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 into the containment or recovery point with minimal impact. Decanting therefore increases the effective on-site storage capacity and equipment operating time. Oil recovery operations can continue as long as there is a place to store the recovered fluids. Once field storage capacity is reached, skimming/vacuuming operations must terminate until additional storage is provided. 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 accidental discharged oil can be contained and recovered. Approval to decant during a response, although unlikely, must be requested and approved through the IC/UC, with concurrence from the respective RRT. The decision making process for incident specific RRTs, is outlined in each RCP.

3250 DECONTAMINATION GROUP

The Decontamination Group Supervisor is responsible for decontamination of personnel and response equipment in compliance with approved statutes. Contaminated personnel and personnel entering contaminated areas shall be decontaminated in accordance with the instructions of the site SOFR. Duties include:

- Implement the Decontamination Plan.
- Determine resource needs.
- Direct and coordinate decontamination activities.
- Brief site SOFR on conditions.
- Establish the Contamination Reduction Corridor(s).
- Identify contaminated people and equipment.
- Supervise the operations of the decontamination element in the process of decontaminated people and equipment.
- Maintain control of movement of people and equipment within the Contamination Reduction Zone.
- Maintain communications and coordinate operations with the Entry Leader.
- Maintain communications and coordinate operations with the Site Access Control Leader.
- Coordinate the transfer of contaminated patients requiring medical attention (after Decon) to the Medical Group.
- Coordinate the handling, storage and transfer of contaminants within the contamination reduction zone.

Additional information regarding this position can be found Chapter 20 & 21 of the USCG IMH.

3250.1 SAMPLE DECON PLAN

Chapter 10 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities is available for reference. Chapter 10 of this OSHA manual covers Decontamination and Decon Plans.

3260 SMART PROTOCOL

See Section 1660 of this plan.

3270 IN-SITU BURNING

The ISB Operations Group Supervisor is responsible for coordinating all aspects of an ISB operation. For aerial ignition, the ISB Operations Group Supervisor works closely with the Air Tactical Group Supervisor. Duties include:

- Determine resource needs.
- Assist the Planning Section in the development of ISB operations and monitoring plans.
- Implement approved in-situ burn operations and monitoring plans.
- Manage dedicated in-situ burn resources.
- Coordinate required monitoring.

The ISB Operations Group Supervisor responsibilities are covered in Chapter 20 of the IMH.

3270.1 IN-SITU BURN OPTIONS

See Sections 1650.3 and 1660. [Link to RCPs]

3270.2 IN-SITU BURN CHECKLIST

See Appendix VI of the RRT5 RCP: In-Situ Burning of Oil as a Response Tool in Region 5.

3270.3 ISB PREAUTHORIZATION ZONES

Presently there are no pre-authorized ISB zones within the area covered by this plan. The Region II, III and V RRT's strongly recommend that ISB be considered as a means to avert potential oil spill impacts to beaches, wetland environments, and Great Lakes and inland resources. [Link to RCPs]

3270.4 TYPES OF ISB EQUIPMENT REQUIRED

If ISB equipment is required, the FOSC will consult with appropriate Subject Matter Experts through the respective RRT network to determine this requirement.

3280 BIOREMEDIATION

See Section 1650.4. [Link to RCPs]

3280.1 BIOREMEDIATION CHECKLIST

See Appendix V of the RRT5 RCP: Chemical Use Checklist in Region 5. [Link to RCPs]

3280.2 BIOREMEDIATION PREAUTHORIZATION ZONES

Presently there are no pre-authorized bioremediation zones within the area covered by this plan. The Region II, III and V RRT's recommend that bioremediation be considered as a means to avert potential oil spill impacts.

3280.3 TYPES OF BIOREMEDIATION RESOURCES REQUIRED

If bioremediation resources are required, the FOSC will consult with appropriate Subject Matter Experts through the RRT network to determine this requirement.

3300 EMERGENCY RESPONSE BRANCH

The Emergency Response Branch is primarily responsible for overseeing and implementing emergency measures to protect life, mitigate further damage to the environment, and stabilize the situation. This branch is divided into the following groups:

- Salvage Group (SMFF)
- Fire Suppression Group (SMFF)
- Hazardous Materials Group Additional information regarding this position under

ICS can be found in the USCG IMH.

3310 HAZARDOUS MATERIALS GROUP

The Hazardous Materials Group Supervisor is responsible for the implementation of the phases of the IAP dealing with the Hazardous Materials Group operations. The Hazardous Materials Group Supervisor is responsible for assignment of resources within the Hazardous Materials Group reporting progress of control operations and status of resources within the Group. The Hazardous Materials Group Supervisor directs overall operations the Hazardous Materials Group.

This activity will be conducted by the fire department/HAZMAT Team with jurisdiction over the location of the incident. USEPA can provide HAZMAT assistance. Duties include:

- Ensure the development of Control Zones and Access Control Points and placement of appropriate control lines.
- Evaluate and recommend public protection options to the OSC or Branch Director.
- Establish environmental monitoring of hazard site for contaminants.
- Ensure recommended safe operational procedures are followed.
- Ensure proper personnel protective equipment is selected and used.

Additional information regarding this position can be found in Chapter 21 of the USCG IMH.

3320 INITIAL EMERGENCY RESPONSE PROCEDURES

Additional information regarding this position can be found in Chapter 3 of the USCG IMH.

3330 EVACUATION PROCEDURES

The decision to evacuate an area due to safety of the public will normally be decided by the County Emergency Management Coordinator, the Fire Chief or the County Sheriff. See the specific county Emergency Operation Plans or contact the County Emergency Managers listed in Section 5000 this plan.

3400 AIR OPERATIONS BRANCH

3410 AIR OPERATIONS BRANCH DIRECTOR (AOBD)

The AOBD is responsible for all aspects of incident aircraft from supporting tactical operations to logistical support of the aircraft. The primary responsibilities of the AOBD are outlined in the USCG IMH, including:

- Request declaration or cancellation of restricted air space area.
- Providing enforcement of safety regulations.

Additional information regarding this position can be found in Chapter 7 of the USCG IMH.
[Link to Temporary Flight Restriction Information]
[See 9700 on how to establish Temporary Flight Restrictions]

3420 AIR TACTICAL

The Air Tactical Group Supervisor is primarily responsible for tactical operations of aircraft and aircrews. Including coordination and scheduling of aircraft operations intended to locate, observe, track, shrivel, support dispersant applications, or other deliverable response application techniques, or report on incident situation when fixed and/or rotary-wing aircraft are airborne at an incident. Duties include:

- Participate in AOBD planning activities.
- Inform AOBD of group activities. • Coordinate activities with AOBD.

- Identify resources/supplies dispatched for Air Tactical Group.
- Obtain assigned ground-to-air frequency for airbase operations from COML or Incident Radio Comms Plan (ICS 205-CG).
- Inform AOBD of capability to perform night flying service.
- Ensure compliance with each agency's operations checklist for day and night operations.
- Debrief as directed at end of each shift.

Additional information regarding this position can be found in Chapter 7 of the USCG IMH.

3420.1 AERIAL SURVEILLANCE

The Air Tactical Group Supervisor performs aerial surveillance coordination activities with airborne fixed and/or rotary wing aircraft. Aerial Surveillance to locate, observe, track, and support dispersant applications or other response application techniques, including reporting incident situation. This includes oil spill tracking, observation and remote sensing. These aerial missions will be coordinated with scientific and technical specialists. Findings will be reported up the IMT chain of command to support Operations and Planning Sections. The Air Tactical Group Supervisor briefs AOBD and updates Situation Unit Leader (SITL).

3420.2 PROCEDURES FOR TEMPORARY FLIGHT RESTRICTIONS

In all cases, the Federal Aviation Administration (FAA) and/or nearest airport which could be affected should be contacted. Notice to Airmen (NOTAM) or similar advisories can be posted/broadcasted by the FAA to alert aviators to possible environmental hazards/concerns. Likewise, response personnel and media engaged in assessment or follow-up spill site surveillance need to be fully aware of FAA and/or USDOD controlled airspace and any hazards or restrictions that may exist. See the FAA NOTAM website for more information.

3430 AIR SUPPORT

The Air Support Group Supervisor is primarily responsible for supporting aircraft and aircrews. This includes providing fuel and other supplies; providing maintenance and repair of aircraft; keeping records of aircraft activities; and providing enforcement of safety regulations. Also managing Helibases and Helispot operations, and maintaining liaison with fixed-wing air bases. Duties include:

- Participate in AOBD planning activities.
- Inform AOBD of group activities.
- Identify resources/supplies dispatched for the Air Tactical Group.
- Request special air support items from appropriate sources through Logistics Section. • Determine the need for assignment of personnel and equipment at each airbase

- Coordinate activities with the AOBD.
- Obtain assigned ground-to-air frequency for airbase operations from COML or Incident Radio Coms Plan (ICS 205-CG).
- Inform AOBD of capability to perform night flying service.
- Ensure compliance with each agency's operations checklist for day and night operations.
- Ensure dust abatement procedures are implemented at Helibases and Helispots.
- Provide crash-rescue service for Helibases and Helispots.
- Debrief as directed at the end of each shift.

Additional information regarding this position can be found in Chapter 7 of the USCG IMH.

3430.1 AIRPORTS AND HELIBASES

See Section area specific GRPs for a listing of Airports and Helibases. Helibase is a location within the general incident area for parking, fueling, maintenance, and loading of helicopters.

3500 STAGING AREAS (STAM)

The STAM is under the direction of the OSC and is responsible for managing all activates within the STAM.

Additional information regarding this position under ICS can be found in Chapter 7 of the USCG IMH.

3510 SECURITY

Security for the staging areas will be coordinated between the USCG and the local law enforcement in the area.

Additional information regarding this position under ICS can be found in the USCG IMH.

3600 WILDLIFE BRANCH

The Wildlife Branch Director is responsible for minimizing wildlife injuries during spill responses; coordinating early aerial and ground reconnaissance of wildlife at the spill site and reporting results to the SITL; advising on wildlife protection strategies, including diversion booming placement, ISB, and chemical countermeasures; removing of oiled carcasses, employing wildlife hazing measures as authorized in the IAP; and recovering and rehabilitating impacted wildlife. A central Wildlife Processing Center should be identified and maintained for evidence tagging, transportation veterinary services, treatment and rehabilitation storage, and

other support needs. Activities of private wildlife care groups, including those employed by the RP, will be overseen and coordinated by the Wildlife Branch Director.

This branch is composed of two working groups: Wildlife Recovery Group and the Wildlife Rehabilitation Center.

3610 FISH AND WILDLIFE PROTECTION OPTIONS

In addition to wildlife initially impacted after the release or spill, continued exposure should be considered in planning due to migrating wildlife re-entering contaminated areas during clean-up activities. Several options available to the FOSC/UC include hazing and capture/re-release. Any such measures should be evaluated through the Environmental Unit with appropriate recommendations made in accordance with applicable laws and regulations.

Additionally, measures to protect wildlife may include all or a combination of the following:

- Preventing the spill from reaching areas where wildlife are located by either containing, deflecting or recovering the material.
- Deterring wildlife from entering areas already affected by contamination.

Wildlife deterrence devices or methods are generally grouped into visual or auditory, or a combination of both. The types of equipment used and sources for their acquisition can be found in the Fish and Wildlife and Sensitive environments portion of the External Annex to this plan. In an emergency, the USFWS, state wildlife agency, or local USDA Wildlife Services office may be able to locate and provide limited amounts of this equipment.

3620 RECOVERY

The Wildlife Recovery Group Supervisor is responsible for coordinating the search for collection and field tagging of dead and alive impacted wildlife and transporting them to processing center(s). This group should coordinate with the SITL in conducting aerial and group surveys of wildlife population in vicinity of the spill. They should also deploy acoustic and visual wildlife hazing equipment as needed.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3620.1 WILDLIFE RECOVERY OPERATIONS AND PROCEDURES

If exposure of birds and other wildlife to oil occurs, an immediate decision must be made concerning the capture and rehabilitation of oiled birds and other wildlife. That decision must be made in consultation with appropriate state and federal natural resource trustees, because state and federal permits are usually required for such activities. The USDOI has statutory responsibilities (delegated to USFWS) for the protection of migratory birds and federally listed threatened and endangered species. If wildlife other than migratory birds or federally listed species are found injured, the responsible agency would typically be the state wildlife agency. See Section 4800 for required permits. [See GRPs]

The USFWS and state natural resource agency are responsible for overseeing spill response activities relative to their effects on fish and wildlife resources. These oversight responsibilities are carried out under the overall direction of the FOSC. In some instances, the federal and state agencies will participate in activities such as hazing, capture, relocation and release of wildlife. Those natural resource agencies typically do not conduct treatment or rehabilitation of injured trust resources. However, all wildlife rescue and rehabilitation efforts will be directed by USFWS and/or the state wildlife agency, including the approval of a qualified wildlife rehabilitator (QWR). The USFWS and state wildlife resource agencies will usually recommend that the RP or FOSC enter into a contract with a QWR. In all cases where a QWR is utilized, the USFWS and state natural resource agencies will remain in an oversight role. Oversight responsibilities include, but are not limited to, the identification and certification of a QWR; the supervision/oversight of injured wildlife collection, handling, cleaning and associated veterinary care; the release of successfully rehabilitated wildlife to the wild; and/or the disposition of carcasses to labs and evidence storage. The Fish and Wildlife and Sensitive Environment section of the GRPs contain guidance on rehabilitation facilities, equipment and training requirements.

3620.2 RECOVERY PROCESSING

Detailed information concerning capture and recovery of birds is contained in the USFWS - Best Practices for Migratory Bird Care during Oil Spill Response. Only trained individuals should undertake the capture and treatment of oiled birds, and teamwork is essential to minimize additional stress to the birds.

The USFWS's Division of Law Enforcement (DLE) is responsible for investigating suspected and alleged violations of federal wildlife laws including the Migratory Bird Treaty Act, 16 USC 703 *et seq.,* the ESA, 16 USC 1538 *et seq.*, the Eagle Protection Act, 16 USC 668a *et seq.,* the National Wildlife Refuge Act, 16 USC 668dd *et seq.,* and several others. Wildlife injuries, mortalities and habitat impacts resulting from spills can constitute violations of DLE - enforced laws. Agents of DLE may be required to initiate investigations during the spill response phase in order to document violations and collect evidence in a timely manner. It should be emphasized that maintaining chain of custody is paramount when handling wildlife that may be considered evidence for potential litigation. DLE agents will need to establish chain of custody from the onset of any capture or recovery. These officers will normally coordinate their activities with the FOSC or other on scene law enforcement personnel. Additionally the USFWS agents can insure that responders possess the necessary federal permits and that wildlife-related response activities are accomplished in accordance with applicable law and permit provisions.

Processing procedures will be specified as incident specific criteria dictates.

3620.3 CARCASS RETRIEVAL AND PROCESSING

When collecting carcasses during capture activities, capture teams should receive guidance from natural resource management agencies as to which carcasses to collect and how to record the location and condition of the carcass prior to collection. Oiled carcasses should be collected in

accordance with spill-incident specific instructions and chain of custody protocols as provided by the natural resource management agencies. Each carcass should be photographed then placed in an individual bag or wrapped in aluminum foil; labeled with date, time, location, and collector's name; and taken to a designated morgue location.

3630 WILDLIFE REHABILITATION

The Wildlife Rehabilitation Center Manager is responsible for the oversight of facility operations including receiving oiled wildlife at the processing center, recording essential information, collecting necessary samples, and conducting triage, stabilization, treatment, transport, and rehabilitation of oiled wildlife. The Wildlife Rehabilitation Center Manager is responsible for assuring appropriate transportation to appropriate treatment centers for oiled animals requiring extended care treatment.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

3630.1 WILDLIFE REHABILITATION OPERATIONS

The contamination of wildlife by oil has a high public impact, which must be recognized by the FOSC, the UC, and members of the RRT. Public interest, inquiries, criticism, and demands for the cleaning of affected wildlife can seriously hamper the FOSCs ability to proceed with mitigation of the spill. Early inspection of impacted or potentially impacted areas known to be wildlife habitat should be made by the FOSC, and at first sign of wildlife involvement, the FOSC should contact the USDOI on the respective RRT to request organization and supervision of the wildlife protection efforts. Funding will be required either from the responsible party or the pollution fund for these efforts. The following brief synopsis outlines the three elements of a wildlife conservation program:

- Protection: Hazing devices and removal of dead impacted wildlife may be helpful in keeping other wildlife from impacted areas. Baiting clean areas is another method of protecting unoiled wildlife.
- Collection: Only trained collectors should be allowed to participate, due to safety considerations such as (1) the potential for contact with pollutants; (2) physical hazards involved in the handling of wildlife; and (3) the potential for additional stress placed on the wildlife involved. Federal and state permits are required for collection of most wildlife.
- Rehabilitation: This medical procedure should be done by trained and permitted supervision. In addition to trained and permitted rehabilitators, considerable additional resources – including trained volunteers, supplies, and facilities – are critical to a timely and effective rehabilitation effort.

The Wildlife Branch must coordinate its efforts with the NRDAR Unit via the LOFR and Resources at Risk Specialists within the Environmental Unit of Planning. Federal Trustees from the USFWS and state trustees, as well as Tribal Trustees, will have personnel in these cells. This coordination must start up early if these cells are activated.

If the decision is made, in consultation with the applicable natural resource trustees, to go forward with wildlife rehabilitation, a standard set of identified criteria will be used by USFWS and state wildlife agencies in selecting or recommending a QWR. The NCP in 300.210 (4)(ii)(h) requires the fish and wildlife input to identify and secure the means of providing, if needed, the minimum required OSHA and USEPA training for volunteers, including those who assist with injured wildlife. The OSHA Hazard Communication Standard (HAZCOM) should be used as a standard for communicating the potential hazards to individuals involved in assisting injured wildlife. HAZCOM applies to wildlife rehabilitation organizations because petroleum and hazardous chemicals are considered a human health hazard. Besides chemical hazards, other hazards such as mechanical, physical and biological hazards are also present during rescue and rehabilitation activities.

Workers must be aware of and trained on dealing with these hazards as well. Training elements should include field and facility concerns on the behavior of impacted birds, proper animal restraint, and personal protective equipment and clothing to protect workers from blood-borne pathogens and zoonoses (diseases transmittable from animals to humans). Personnel health and safety concerns relating to wildlife rescue and rehabilitation should be considered in all plans and actions when dealing with contaminated wildlife. The Fish and Wildlife and Sensitive Environment portion of the External Annex contains additional information on safety, training and potential risks associated with wildlife rescue and rehabilitation. In addition the USFWS - Best Practices for Migratory Bird Care During Oil Spill Response, Chapter 4 contains specific information on stabilization and rehabilitation.

Also, detailed information on this topic can be found in the respective USEPA region's RCP, Fish and Wildlife and Sensitive Environments portion of the External Annex. Specific permits required by wildlife handlers are discussed in Section 4810.

3630.2 REHABILITATION FACILITIES

Facility needs usually focus on the majority of species affected by a petroleum discharge, which are generally birds. Facility requirements can vary significantly, depending on overall size of response, species and age of wildlife contaminated, the type of contaminant, the season/weather, the location of the spill, and the rehabilitation effort.

The facility needed will vary according to the needs of the specific spill situation, and should be determined by the QWR experienced in oil spill response work. A suitable facility must have a large open space on the ground floor that can easily be configured and reconfigured to accommodate the changing needs of this unique form of wildlife rehabilitation. All rehabilitation efforts should be accommodated under one roof. A warehouse, armory, motor pool or convention hall that is accessible to a trained labor force is within reasonable distance from hotel accommodations and has adequate parking and exterior grounds could meet this requirement. The facility may be located up to 3-4 hours from the spill site, provided that onscene stabilization is administered prior to transport. An oil spill stabilization site can be located at the time of the spill. The Responsible Party should be proactive in this effort.

3630.3 FACILITY REQUIREMENTS AND EQUIPMENT NEEDS

Facility needs usually focus on the majority of species affected by a petroleum discharge, which historically are avian.
Facility requirements can vary depending on the following factors:

- Anticipated number of animals
- Types and number of species
- Age of wildlife contaminated
- Type of contaminant
- Season/Weather
- Location of the spill
- Facility availability

The most appropriate facility, will vary according to the specific needs of the spill situation, and should be selected by a QWR, experienced in oil spill response work at the time of a spill.

Because facility requirements can vary significantly, a permanent facility is not always advisable, and may actually be an impediment. A suitable facility must have a large open space on the ground floor that can easily be configured and reconfigured to accommodate the changing needs of this unique form of wildlife rehabilitation. All rehabilitation efforts should be accommodated in connected or adjacent buildings whenever possible. Experience has taught that a tent or other outdoor situation is often inefficient and unsuitable. A warehouse, armory, motor pool or convention hall that is accessible to a trained labor force, is within reasonable distance from hotel accommodations, and has adequate parking and exterior grounds could be a suitable facility. Considerations for a suitable facility should include at a minimum:

- Site Safety
- Hot and Cold Water Capacity
- Electric & Lighting
- HVAC Systems
- Communications

If a wildlife rehabilitation center is situated in a secure site, e.g., military installations or refinery, procedures for allowing entry for a fluctuating volunteer work force must be developed. If the facility is located more than a 30-45 minute drive from the spill site, on-scene stabilization must be administered prior to transport. An oil spill stabilization site can be located at the time of a spill.

It is recommended that a list be assembled of potential real estate within the identified high-risk areas, and the sites be physically reviewed by a representative of the wildlife response group

with major spill response experience. Once the actual facilities have been identified, all costs, availability, and contract information should be reviewed with the GRP. See Chapter 6 of the USFWS - Best Practices for Migratory Bird Care During Oil Spill Response, for more specific information on facility requirements and the respective GRPs for additional wildlife rehab organizational information.

3630.4 REHABILITATION PROCEDURES

The goal in rehabilitating wildlife during an oil spill response is the release of a healthy individual back into its natural environment. It should be noted that only trained personnel should administer this type of care. The Safety Data Sheet (SDS) for the spilled contaminant should be reviewed prior to handling contaminated wildlife. All chemical hazards to humans also apply to the affected bird or other wildlife species. The steps in the rehabilitation process are outlined in much detail in the USFWS Best Practices attachment chapter 4.

The rehabilitation guideline process can be summarized in the following steps:

- Stabilization
- Evaluation and admission
- Euthanasia (covered by policy or plan with natural resource agency
- Necropsy
- Cleaning
- Husbandry

4000 PLANNING

The Planning Section plays a critical role in moving an incident from a reactive response to a proactive response. Regardless of the initial complexity of the incident the Planning Section must look far beyond the apparent situation and ask "What if?" The PSC must be aware of immediate challenges and those that lie on the horizon. The size of the Planning Section will be based on the needs of the incident.

4010 OPERATIONAL PERIOD

When you are working through the planning process, you are developing an IAP for the next Operational Period, not the Operational Period you are currently working in. You cannot enter the ICS Planning Process without defining the Operational Period. It is the IC/UC's responsibility to determine the Operational Period.

While Operations is conducting tactical operations during the current Operational Period, Planning is overseeing the development of the IAP that will guide response operations during the following Operational Period.

4020 PLANNING SECTION ORGANIZATION

The Planning Section is a part of the General Staff, and is responsible for collection, evaluation, dissemination and use of incident information and maintaining status of assigned resources. The Planning Section requires information to:

- Understand the current situation.
- Predict the probable course of incident events.
- Prepare strategies, plans and alternative strategies and plans for the incident. • Submit required incident status reports.

4100 PLANNING SECTION CHIEF

See Planning Section Chief Job Aid and the USCG IMH for additional information.

When an incident reaches the complexity or duration that a PSC is required, serious consideration should be given to immediately deploying a Resources Unit Leader (RESL) and a SITL to support the planning effort.

The PSC is responsible for:

- Providing current, accurate situation display and concise briefings in support of meeting schedule and UC expectations.
- Accurately tracking all resources through the use of T-cards or other resource tracking system and aggressive, pro-active field observers. Establishing and maintaining site control use of check in locations/recorders.

- Facilitating the Planning Process by conducting timely meetings in accordance with the meeting schedule and working closely with OSC, LSC, and Command Staff.
  - Determine the meeting schedule based on the operational period.
  - Additional information regarding meeting, briefings, agendas, and schedules can be found in the USCG IMH.
- Ensuring thorough documentation of all key decisions and incident related documents.
- Establishing and maintaining an 'open action' list of issues that must be accomplished. Ensuring that each issue on the list is assigned to the appropriate ICS command element (i.e. Operations Section) for completion.
- Ensuring a complete and thorough IAP is delivered in support of operations.
- Utilizing technical specialists in coordination with Operations to provide critical information r specialized opErations and planning efforts to support incident operations. Example of technical support includes: salvage plans, environmental impact statements, hazmat modeling, oil spill trajectories, and intelligence efforts etc.
- If an ICS-AC is established, ensure close coordination. Consult the guidance outlined in the ICS AC Job Aid.

Actions to take upon arriving at the incident command post:

- Get a situational brief from the IC/UC to collect information for the Resources and Situation Units (request a copy of the ICS- 201, Incident Briefing Form). At a minimum the briefing should include:
  - Information on committed resources
  - Resources ordered
  - Incident situation
  - Current and predicted weather
  - A predication on the course of events
  - Build the planning organization and order staff
  - Consider need for a Planning Deputy
- Establish Planning Section ICP 'footprint'
- Brief incoming personnel
- If appropriate, verify incoming personnel have lodging
- Start a Planning Section phone book
- Brief staff on your expectations
- Start a formal documentation process
- Determine need to assign a documentation specialist to the UC to document UC decisions and directions
- Start an ICS-214, Unit Log

4200 SITUATION UNIT LEADER CONSIDERATIONS

- Determine the number and type of staffing required and order immediately. Some variables to consider when estimating staffing needs:
  - Intensity of the operations being conducted
  - Size of the incident (is there a large command team in place)
  - Complexity of the incident (may require many technical specialist)
  - Duration of the incident (need to factor into your staffing needs the able to manage the Situation Unit 24 x 7)
- What type of technical specialists do you require (Geographic Information Specialists, weather specialists, plume modeling specialists, etc.)? • Determine the size of your workspace.

4210 SITL RESPONSIBILITIES

- Collect current incident information (potential methods):
  - Debrief division/group supervisors
  - Talk to technical specialist(s)
  - Gather information from meetings and briefings
  - Work with other members of the response team such as the SOFR
- Employ your Field Observers (FOBS).
- Brief your FOBS on expectations
- Prepare an incident map for the IAP

Additional information regarding this position can be found in Chapter 8 of the USCG IMH.

4220 USE OF FIELD OBSERVERS (FOBS)

- Ensure that the FOBS are knowledgeable in the type of incident they are collecting information on.
- Coordinate the FOBS field activities with the OSC. For safety purposes, the OSC must know who is in the field and where they are located.
- Ensure that the FOBS is properly outfitted with safety equipment and the tools needed to collect the incident information (i.e. maps, radio, transportation, etc.).
- Develop a list of things you would like the FOBS to collect while in the field.

For example:

- Progress of operations
- Boundaries of the incident
- Weather
- Wildlife impacted
- Tactical resources on the incident and their location (work with the RESL to see if they need this information collected remember ICS is teamwork)

Establish a time and method for the FOBS to report their findings. For example, when the situation you are facing is unclear or dynamic, you may want information communicated back to you every 30 minutes. The method may be by radio.

Additional information regarding this position can be found in Chapter 20 of the USCG IMH.

4230 ESTABLISH SITUATIONAL DISPLAYS

Establishing situational displays should include (list is not inclusive):

- The current incident objectives
- Summary of the status of the incident. This includes information on the incident itself (i.e. numbered of injured, buildings damaged, etc.) and information on response resources (i.e. number of ambulances, fire trucks, etc.)
- The current situation (i.e. incident boundaries, weather, tides & currents, etc.)
- Predictions and potential impacts of what could happen if weather does not cooperate and mitigation strategies do not have the desired outcome
- Schedule of meeting times and locations

The displays should be established in a manner that lets anyone examining them quickly capture the information they are looking for. Displays serve both responders and are a part of the historical record of the incident. The situation display map/chart is used for briefings and meetings, and the need for current and accurate information is absolutely essential.

The displays should never be moved. If the complexity of the incident requires a dedicated briefing area, a duplicate set of maps will have to be maintained.

4240 MEETINGS AND BRIEFINGS

Every formal meeting or briefing that takes place within the ICS Planning Process starts with a situational brief. This is to ensure decisions being made are grounded with the most current information. Deliver situational updates with accuracy and assure the highest informational integrity. Words and graphics must paint a picture of the current incident status and a glimpse into the future of what the status might be.

4300 RESOURCES

4310 ESTABLISHING A RESOURCE STATUS DISPLAY

The Resource Status Display is the culmination of a process that started with:

- Check-in of arriving resources using the ICS-211, Check-In Form.
- Field verification of resources that arrived on-scene before check-in was established,
- Communicate resources check-in information back to the Incident Command Post where Status Recorders transfer it to the appropriate colored T- card and placed in a Resource Status Display that shows its location on the incident.

The OSC is responsible for determining how an incident is divided into manageable units. The RESL uses that exact naming to identify location of operational resources

The RESL is responsible for establishing the naming of header cards for overhead personnel at the Incident Command Post. For example, a RESL may title a header card titled 'Command', and place the IC, LOFR, SOFR and PIO cards under it. For those working in the Planning Section, the RESL may label a header card Planning' and place all overhead personnel in Planning under that card.

4320 ROLE OF THE RESOURCES UNIT IN SUPPORTING THE OSC

The Resources Unit supports the OSC in filling unanticipated resource requirements during an Operational Period. The OSC can fill the requirement internally, through STAM by reassignment or through Resources Unit by identifying available resources and reassigning them. If no resources are available Resources Unit will submit a resource request through Logistics and notify Operations with an estimated time of arrival.

4330 RESOURCE UNIT ROLE IN THE ICS PLANNING CYCLE

The reason the RESL has established check-in, conducted field verification and established a resource status display is to support the Planning Process.

4340 VOLUNTEERS

Volunteers make up a special group of stakeholders who share commitment to protecting the environment. USEPA and USCG FOSCs may use the services of volunteers in oil spill responses in accordance with their statutory authorities and other applicable laws. The IC/UC should make that decision on a case-by-case basis, weighing the interests of the local volunteer community and benefits of volunteer efforts against health and safety concerns, resources needed for volunteer supervision and training, liability concerns, and other relevant issues.

As noted in the NCP, volunteers generally should not be used for physical removal of oilcontaminated materials. Typically, volunteers should be used for minimal risk activities.

In certain circumstances volunteers may be used for higher risk activities such as certain oiled wildlife cleaning activities if they have received appropriate training and personal protective equipment, as contemplated by the NCP volunteer requirements. Each GRP contains volunteer information for the respective geographic area. [Link to GRPs]

4340.1 NRT USE OF VOLUNTEERS GUIDELINES FOR OIL SPILLS

This NRT document provides guidance for FOSCs and ACs using or considering using volunteers during an oil spill incident. It was developed in response to incident lessons learned and contains information, examples, and tools to help with everything from coordination and outreach, to organization and oversight, and also includes tips on avoiding potential issues associated with utilizing a volunteer workforce. Though this document is comprehensive in nature, it is a guidance document and was not designed to preclude any existing laws or agencyspecific policies. This document will be evaluated and updated periodically by the NRT in an effort to incorporate future lessons learned and maintain relevance in the field. [Link to NRT Use of Volunteers Guidelines for Oil Spills]

4340.2 VOLUNTEER MANAGEMENT AND DOCUMENTATION

When volunteers are used to support an incident the IC/UC should establish the Volunteer Coordinator ICS position as part of the IMT. The Volunteer Coordinator is responsible for managing and overseeing all aspects of volunteer participation, including recruitment, induction, and deployment. There are (3) recommended ICS structure positions related to volunteers that are based on the level of volunteer interest.

- Low Volunteer interest: Establish a Volunteer Coordinator in accordance with the USCG IMH.
- Moderate to Heavy Volunteer Interest: A Volunteer Unit Leader (VUL) may be assigned in the Planning Section. The VUL will manage and coordinate the use of Volunteers through collaboration with Volunteer Organizations noted in the ACP.
- Heavy Volunteer Interest: The Command Staff shall be expanded to include a Volunteer Officer (VO) to coordinate with the LOFR, and the Planning and Operations Sections. The VO shall closely coordinate volunteer needs and requirements with the PSC.

In each case, the Volunteer Coordinator, Unit Leader, Officer will coordinate with the JIC and LOFR to publicize volunteer related information, such as alerts and training. Generally, the LOFR will be the first to receive external reports of volunteer interest due to outreach responsibilities of that position. If Volunteer interest exists, the LOFR should recommend establishment of a Volunteer Coordinator.

Due to potential hazards, safety/exposure concerns, and a potential for a lack of pre-established medical monitoring and training, volunteers may be best utilized away from incident hazards and exposures working in the ICP for the General Staff answering phones, documenting the incident on ICS 214s, acting as check-in recorders, and helping with food and water for responders. The

FOSC will work with the applicable ACs to facilitate volunteer outreach to identify Affiliated Volunteer Organizations (AVOs), and analyze their capabilities and resources regarding volunteer management and services. When possible, agreements with AVOs will be made.

4340.3 AVO RESOURCES AND CAPABILITIES

General information on AVO resources can be found at the Corporation for National and Community Service web page at: http://www.nationalservice.gov/. These resources are for general disaster response, but some may be available for support during oil spill response operations. VolunteeringInAmerica.gov hosts the most comprehensive collection of data on volunteering and civic engagement ever assembled, including data for every state and almost 200 cities. The data is collected through a partnership with the Census Bureau and the Bureau of Labor Statistics, and has been released annually since 2005. The web site has been substantially upgraded and is much more interactive for users who wish to retrieve and customize profiles of their local area's volunteering information. In addition, the website contains links to a number of other useful resources (including research reports, proven strategies, and effective practices) that are designed to help local nonprofit leaders target their recruiting efforts more effectively match local programs with available volunteer resources, fill service gaps, and do a better job of retaining their volunteers.

State Service Commissions provide Corporation funding to AmeriCorps state programs in their states through annual grant competitions. State Service Commissions are also charged with encouraging volunteering in their states. They often administer special volunteer initiatives. The State Service Commissions directory and information on the State Volunteer Coordinators can be found at: http://www.nationalservice.gov/.

Historically, volunteers have been involved in wildlife recovery and rehabilitation activities. The following two organizations have become recognized experts in oiled bird rehabilitation and most likely will be called upon to assist in this activity if there is a significant impact to birds and wildlife. A one-day workshop provided by either of these organizations gives an individual an introduction to rehabilitation procedures, allowing them to offer their future services (as volunteers or part-time staff) to a QWR during a spill involving wildlife.

4400 DOCUMENTATION UNIT LEADER (DOCL)

The role of the DOCL in an ICS organization provides the IC/UC the ability to create a documentation package from its inception to the point where litigation may occur. Before beginning duties a DOCL determines:

- Size and complexity of incident.
- Expectations of the FOSC ensure that you receive the FOSCs full support for Documentation as the repository for all documents during the response.
- Agencies/Organizations/Stakeholders involved.

Additional information regarding this position can be found in Chapter 8 of the USCG IMH.

4500 DEMOBILIZATION UNIT

Demobilization Unit is responsible for developing the Incident Demobilization Plan. On large incidents, demobilization can be quite complex, requiring a separate planning activity. Note that not all agencies require specific demobilization instructions.

Additional information regarding this position can be found in Chapter 8 of the USCG IMH.

4510 DISTRIBUTION OF THE DEMOBILIZATION PLAN

The Demobilization Plan should be distributed at least 24 hours prior to the release of the first resource. The following should receive a copy of the Demobilization Plan:

- IC/UC
- Command and General Staff
- RESL
- Documentation Unit (original copy)

4520 STEPS IN THE DEMOBILIZATION PROCESS

1. All unit leaders in Planning, Logistics and Finance/Administration identify any surplus resources at least 24 hours in advance of their anticipated demobilization time. The RESL will work with the OSC to identify operational resources.
2. Identified surplus resources for each Section are given to the Section Chief who will forward the tentative list of surplus resources to the Planning Section Demobilization Unit.
3. The Demobilization Unit will compile a tentative list of surplus resources from all Sections and send them to the IC/UC via the PSC.
4. IC/UC approves the list of resources to be demobilized.
5. Approved demobilization list is sent to the Resources Unit and to the appropriate Section Chiefs.
6. Section Chiefs notify the resources under their control that they have been approved for demobilization and the procedures to follow.
7. Demobilization Unit ensures that the check out process is followed.
8. Demobilization Unit sends completed Demobilization Check out forms to Documentation Unit for the historical record. [See 9700 Section for sample DeMob Plan]

4600 ENVIRONMENTAL UNIT

Environmental Unit Leader (ENVL) is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The ENVL prepares environmental data for the Situation Unit. Technical Specialists frequently assigned to the Environmental Unit may include:

- Scientific Support Coordinator
- Sampling Specialists
- Response Technologies Specialists
- Trajectory Analysis Specialists
- Weather Forecast Specialists
- Resources at Risk Specialists
- Shoreline Cleanup Assessment Team (SCAT)
- Historical/Cultural Resources Specialists
- Disposal Technical Specialists

The major responsibilities of the ENVL are:

- Identify sensitive areas and recommend response priorities.
- Following consultation with natural resource trustees, provide input on wildlife protection strategies (e.g., removing oiled carcasses, preemptive capture, hazing, and/or capture and treatment).
- 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 cleanup 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.

Following consultation with the FOSCs Historical/Cultural Resources Technical Specialist 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.

4600.1 WATER INTAKES SURFACE AND SUB-SURFACE

There are in excess of 100 water intakes in the Sector Buffalo area of responsibility. These intakes are used for a variety of purposes including:

- Supplying municipal water systems
- Providing cooling water
- Supporting manufacture processes, researchers

The intakes can be located at the water's surface, below the water's surface or on the river bottom. Oil or chemicals can have a disastrous effect on equipment, water supplies, manufacturing processes or power generating.

4600.2 WATER INTAKE NOTIFICATIONS

Water intake facilities need to be notified in the early stages of an oil spill or chemical release. Early notification will allow facilities the time to take precautionary measures. Shutting down procedures may be a complex task that requires several hours to several days to safely accomplish. The following methods can be utilized to assure intake facilities have notice of an incident that might impact their intakes:

- Ohio EPA 24 hour emergency hotline 800-282-9378
- Pennsylvania DEP 24 hour emergency hotline 717-787-4343
- New York State Department of Health (Duty Officer) 866-881-2809
- New York State Emergency Management Office 24 hour 518-292-2200 Important

Note: All notifications to the above agencies and water intake owners must be logged and reported to the Situation Unit Leader (SITL).

4610 SCIENTIFIC SUPPORT COORDINATOR

The SSC is one of the special technical advisors within ICS, as specified in the NCP. Though often seated with the Environmental Unit of a UC to support and liaise with the overall response effort, the NOAA SSC has a primary responsibility to serve the FOSC directly as a member of his/her staff. The SSC may be designated by the FOSC as principal advisors for scientific issues, communication with the scientific community and natural resource trustee agencies, and coordination of requests for assistance from state and federal agencies regarding scientific issues. The NOAA SSC and the scientific support team are available to the FOSC 24/7 by calling the assigned NOAA SSC directly.

Typical SSC response functions, at the request of the FOSC, include:

- Serving as ENVL.
- Providing scientific support for operational decisions, such as tradeoffs for use of alternative measures.
- Coordinating on-scene scientific activity, such as field sampling and integrating ongoing academic environmental studies into response needs.

- Integrating expertise form governmental agencies, universities, community representatives, and industry to assist the FOSC in evaluating the hazards and potential effects of releases and in developing response strategies.
- Facilitating the FOSC's communication with the FLAT for natural resources to ensure coordination between damage assessment data collection efforts and data collected in support of response operations.
- Coordinating required emergency consultations for protected resources (such as threatened and endangered species, cultural resources, sensitive habitats, etc.).

NOAA generally assigns SSCs to the USCG Districts in support of Sector planning and response needs. Each SSC is supported by a complete Scientific Support Team that includes expertise in:

- Oil slick trajectory forecasting and monitoring
- Pollutant transport modeling • Environmental chemistry
- Chemical hazard assessment
- Health and safety
- Information management
- Resources at risk
- Biological assessments
- Environmental tradeoffs of cleanup strategies
- Natural Resource Trustee issues

The Great Lakes SSC can be contacted at 206-849-9918. If the SSC cannot be reached, the NOAA Emergency Response Division (ERD) located in Seattle, WA can be contacted 24/7 at (206) 526-4911. Once the USCG calls the SSC for scientific support, the SSC then contacts the NOAA Science Support home team to provide several support products. Typically, generated products include:

- Initial trajectory report
- Oil fate information
- Weather forecast (thereafter once or twice a day)
- Current information; Tidal (n/a in Great Lakes)
- For inland spills, water level forecasts and river velocity estimates
- Continue collecting and updating incident information
- Information or fact sheets on pollutants, bio-sheens, etc.

When contacting the SSC for NOAA ERD modeling and trajectory information the FOSC should provide the SSC with the following information:

- Estimated date/time of the spill or release

- Type of Oil or Hazardous Substance
- Incident Location including Latitude and Longitude
- Estimated amount spilled or released
- Estimated length/size of slick
- Worst case potential discharge or release
- For continuous discharge or release, estimate amount in gallons per minute

Additional information can be found in the USCG IMH Chapter 20, [GRPs].

4700 TECHNICAL SPECIALISTS (THSP)

Certain incidents may require the use of THSP who have specialized knowledge and expertise. THSP are advisors with special skills needed to support the incident. THSP may function within the Planning section or be assigned anywhere in the ICS organization. If necessary, Technical Specialists may be formed into a separate unit. THSP major responsibilities include:

- Provide technical expertise and advice to Command and General Staff as needed.
- Attend meetings and briefings as appropriate to clarify and help resolve technical issues within area of expertise.
- Provide technical expertise during the development of the IAP and other support plans.
- Work with the SOFR to mitigate unsafe practices.
- Work closely with LOFR to help facilitate understanding among stakeholders and special interest groups.
- Be available to attend press briefings to clarify technical issues.
- Research technical issues and provide finding to decision makers.
- Troubleshoot technical problems and provide advice on resolution.
- Review specialized plans and clarify meaning.

A Legal Specialist will act in an advisory capacity during the response. A Human Resources Specialist is responsible for providing direct human resources services to the response organization, including ensuring compliance with all labor-related laws and regulations. Additional information regarding this position can be found in Chapter 8 and Chapter 20 of the USCG IMH.

4710 ENDANGERED SPECIES PROTECTION DURING OIL DISCHARGE EMERGENCY RESPONSE OPERATIONS

The Interagency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities under the FWPCA's NCP and the ESA MOA, which was signed by the USCG, among others, aligns the consultation requirements with the pollution response responsibilities outlined

in the NCP. This section is intended to assist FOSCs and IC/UC in areas where the pre-spill planning called for in the MOA has not yet been completed. It should not be used to replace existing ACP provisions developed pursuant to the MOA or existing regional guidance on implementation of the MOA. It should also not be used as a substitute for completing pre-spill planning called for in the MOA.

4710.1 THE ENDANGERED SPECIES ACT OF 1973

The ESA of 1973 (16 USC 1531 et seq) was enacted to conserve and recover threatened and endangered species and ecosystems upon which they depend. The Act is administered by USFWS in USDOI and NOAA's NMFS (NOAA Fisheries) in USDOC. Under Section 7 of the ESA, federal agencies must consult with USFWS and NOAA Fisheries (The Services) on actions they carry out, permit or fund that may affect listed species or designated critical habitat. ESA Section 7 requires that agencies ensure their actions are not likely to jeopardize listed species or destroy or adversely modify their designated critical habitat. During emergencies, such as disasters, casualties, national defense or security emergencies, and response to oil spills, the ESA allows for emergency consultation during the incident, with formal consultation occurring after the incident, if necessary. The emergency consultation procedures are described in the MOA.

4710.2 HOW THE MOA APPLIES TO THE FOSC

The MOA, signed by the USCG, USEPA, NOAA, USDOI, USFWS, and NOAA Fisheries in July 2001, aligns the ESA consultation requirements with the pollution response responsibilities outlined in the NCP (40 CFR 300). The MOA is intended to be used at the AC level primarily to identify and incorporate plans and procedures to protect listed species and designated critical habitat during pre-spill planning and response activities. In addition, a guidebook addressing the MOA was developed by its signatory agencies to further facilitate cooperation and understanding between the agencies involved in oil spill planning and response. This cooperation is highly successful when established before an incident occurs and needs to continue throughout an incident and post-incident follow-up and review. By working proactively to identify the potential effects of spill response activities on species and their habitat, and then developing response plans and countermeasures, impacts to listed species and/or critical habitat can be reduced or avoided completely during an incident.

4710.3 REFERENCES

Regulations regarding ESA consultation are found in 50 CFR 402, located at:

http://www.access.gpo.gov/nara/cfr/waisidx_04/50cfr402_04.html.

The Interagency Memorandum of Agreement Regarding Spill Planning and Response Activities under the FWPCA's NCP and the ESA

A Guidebook for the Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act

The Endangered Species Consultation Handbook, USFWS and NMFS

Appendix VII: Fish and Wildlife Annex to the USEPA RRT5/RCP

4720 CULTURAL AND HISTORIC PROPERTIES

4720.1 PROTECTION OF HISTORIC PROPERTIES DURING EMEGENCY RESPONSE OPERATIONS UNDER THE NCP

The *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* (PA), which was signed by the USCG, among others, requires consideration of historic properties in planning for and conducting emergency response under the NCP. The PA was developed to help federal agencies sufficiently comply with requirements of the statute. This document is intended to assist FOSCs and IC/UC in areas where 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 pre-spill planning called for in the PA.

4720.2 THE NATIONAL HISTORIC PRESERVATION ACT

On October 15th, 1966, Congress passed 16 USC 470, the NHPA, to preserve the historical and cultural foundations of our Nation. Under Section 106 of NHPA, federal agencies are required to consider the effects of their actions on historic properties and take steps to reduce or eliminate adverse effects.

4720.3 HOW THE PA APPLIES TO THE FOSC

The PA, which was signed by the Assistant Commandant for Marine Safety, Security and Environmental Protection on May 13, 1997, provides an alternative to the process in Section 106 of the NHPA. This ensures appropriate consideration of historic properties within the context of the NHPA during emergency response to a discharge or a release under the NCP. The alternative to following the process in the PA, including the pre-spill planning part of the process, is to follow the complete consultation process in Section 106 of the NHPA.
The PA states that the FOSC is responsible for ensuring that historic properties are appropriately considered in planning and during emergency response. During pre-spill planning activities, the

PA calls for identifying: (1) historic properties listed in, or determined to be eligible for listing in, the National Register of Historic Properties that might be affected by response to a release or spill; (2) unsurveyed areas where there is a high potential for the presence of historic properties; (3) geographic areas or types of areas where historic properties are unlikely to be affected; (4) parties that are to be notified in the event of a spill in a non-excluded area; (5) who will be responsible for providing expertise on historic properties to the FOSCs during emergency response (i.e., the FOSCs Historic Properties Specialist); and developing emergency response strategies to help protect historic properties.

Effective consideration of historic properties during emergency response in the absence of this advance planning is extremely difficult and may not be possible, so to take advantages of the benefits of the PA, FOSCs are to make every effort to conduct this planning effort and incorporate it into the GRPs in advance. During emergency response, FOSCs are responsible for initiating the agreed upon mechanism for addressing historic properties, namely activating the FOSCs Historic Properties Specialist. In turn, the FOSCs Historic Properties Specialist will: (1) notify and consult with parties identified in pre-incident planning and those applicable entities that are listed in the GRPs; (2) assess potential effects of emergency response strategies on historic properties; and (3) recommend to the FOSC response actions to help minimize or eliminate potential impacts to historic properties. [Link to GRPs]

4720.4 OBTAINING EXPERTISE ON HISTORIC PROPERTY MATTERS DURING EMERGENCY RESPONSE

One of the essential pre-spill planning elements is the identification of those responsible for providing reliable and timely expertise on historic properties to the FOSC during emergency response, i.e., the FOSCs Historic Properties Specialist. The PA provides that historic properties expertise and support may be obtained by the FOSC in any one of several ways:

- Implementing an agreement with state or federal agencies that have historic properties specialists on staff;
- Executing a contract with experts identified in ACPs; or
- Privately hiring historic properties specialists.

The PA specifies the professional qualifications and standards of a Historic Properties Specialist. It should be noted that only the FOSC and not the RP may contract with experts to serve as the FOSCs Historic Properties Specialist. An FOSC may only utilize a Pollution Removal Funding Authorization (PRFA) for funding the activation of a Historic Property Specialist during emergency responses to oil pollution incidents. OSLTF resources are not available for hiring of a specialist to assist with pre-spill planning activities.
If FOSCs choose to obtain historic properties expertise through executing contracts with appropriate archaeologists, it is possible to go through a solicitation process that includes technical input and assistance from appropriate SHPOs and federal land management agency cultural resources specialists. Blanket Purchase Agreements may then be established with one or more companies or with one or more named individuals who may be activated during emergency response to serve as the FOSCs Historic Properties Specialist(s). [Link to GRPs]

4720.5 REFERENCES

In the development of an IAP, refer to this document, its appendixes, and the PA. The PA may be found at: http://www.achp.gov/NCP-PA.html. For an example of implementation guidelines for the national PA, refer to the Alaska RRT website: http:// www.alaskarrt.org/.

The list of properties included in the NR may be found at: http://www.cr.nps.gov/nr/research/. However, the NR is not sufficient in helping to determine all of the properties that need to be considered in your ACP, as you must also consider properties that could be determined eligible for inclusion in the NR. For eligibility criteria, please refer to: http://www.nps.gov/history/nr/national_register_fundamentals.htm#start.

The following web page contains links to SHPOs, Tribal Preservation Officers, and Federal Preservation Officers: http://www.nps.gov/history/nr/national_register_fundamentals.htm#start.

Tribal information may be found at: http://www.nathpo.org/, http://www.hanksville.org/sand/contacts/tribal/, http://www.kstrom.net/isk/maps/US.html, and http://www.kstrom.net/isk/mainmenu.html.

4730 CONTINGENY PLANNING FOR GROUP V OIL (NON-FLOATING)

4730.1 INTRODUCTION

As defined in Title 33, Code of Federal Regulations part 154.1020 (facilities) and 155.1020 (vessels) Group V oils are classed as a "Persistent Oil." Persistent oil means a petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this subpart, persistent oils are further classified based on specific gravity as follows:

- Group II: specific gravity of less than .85
- Group III: specific gravity equal to or greater than .85 and less than .95
- Group IV: specific gravity equal to or greater than .95 and less than or equal to 1.0
- Group V: specific gravity greater than 1.0

Oils with a specific gravity of > 1.0, referred to as Group V oils, include some heavy fuel oils, asphalt products, and very heavy crude oils. Oils with a specific gravity greater than 1.0 may be neutrally buoyant or sink when spilled on water. Oils that sink to the bottom or remain suspended in the water column pose risks to certain resources that are not normally affected by floating oils. These resources include fish, shellfish, sea grasses, and other benthic (seabed) and water column biota. Submerged oil may also cause episodic re-oiling of shorelines. Federal rules governing oil spill contingency plans categorize petroleum cargoes according to their physical properties.

Vessels and terminals that handle Group V oils are required to include responses to spills of Group V oils in their facility response plans. The National Academy of Sciences has produced a report on the history, behavior and response of Non-Floating Oils titled, *Spills of Non-Floating Oils-Risk and Response*. Information from that report is summarized below and can be reviewed to consider recommendations and conclusions for response to spills of non-floating oils. The report is available at: http://www.nap.edu/openbook.php?isbn=0309065909.

4730.2 GROUP V OIL SPILL STATISTICS

From 1991-1996, 17% of the petroleum products transported on United States waters were heavy oils. Barges accounted for 44% of heavy oils transported and tank vessels accounted for 56%. Of all oil spills during this time frame, 23% were spills of heavy oils. Of this 23%, 20% exhibited non-floating oil behavior of sinking or becoming suspended in the water column. Barges were responsible for 80% of the volume of heavy-oil spills, 10 times higher than tank vessels. Most notable was the spill and response to the T/B MORRIS J. BERMAN spill, San Juan Puerto Rico on January 7th, 1994. All FOSCs should maintain a copy of the report titled "The Response to the T/B MORRIS J. BERMAN Major Oil Spill", dated 25 August 1995 and a copy of the report titled, "Tank Barge MORRIS J. BERMAN Spill Submerged Oil Recovery Operations", dated 26 July 1994. These two reports identify the cleanup recovery operations of 800,000 gallons of low API #6 oil that was discharged as a result of the grounding of the T/B MORRIS J. BERMAN.

4730.3 BEHAVIOR OF HEAVY OIL

Non-floating oils behave differently and have different environmental effects than oils that float. The water column and benthic resources are at greatest risk during spills of heavy oil due to the non-floating behavior once in the water. Non-floating oils also tend to weather at a much slower rate, resulting in extended impact to resources both over time and distance.

Although floating oil modeling and predictions are well developed, models and predictions of heavy-oil behavior are unverifiable and rarely used. There is a lack of supporting field data due to the complex nature of three-dimensional currents when oil sinks into the water column. Field data can be verified, but methods are very slow and labor intensive that make updating spill models difficult. Remote sensing equipment is very limited in its use because it cannot penetrate the water column.

4730.4 CONTAINMENT, RECOVERY AND RESPONSE

Technologies exist for the recovery and containment of non-floating oils, but few are effective and work only in very limited environments. Silt curtains and nets can be used for containment only if the currents are very weak with minimal wave activity. Recovery by nets and trawls is limited by the viscosity of the oil and net tow speeds. Manual methods for recovery are available, but they are extremely labor intensive and slow.

The lack of Group V oil spill recovery expertise and resources, especially at the local level, in responding to spills of non-floating oil poses a major difficulty to response. Because there are no specialized systems for the removal of non-floating oil, it has been difficult to adapt available equipment for response.

Area committees should maintain inventories of equipment, specialized services and protection priorities for non-floating oils. Response plans for facilities and vessels that handle non-floating oils must also be tested during exercises and conduct drills to ensure effective and efficient response.

Lessons learned from the T/B MORRIS J. BERMAN Major Oil Spill on Submerged Oil Response Techniques considered the following removal options:

- Set up a Submerged Oil Task Force made up of USCG, Spill Management Team, and Spill Cleanup Contractor personnel. Task Force personnel remained a separate element within the Operations Section.
- Divers and Dredging were utilized to great effect. Divers conducted underwater surveys, used snare and bagged congealed oil that was no longer pumpable from underwater sea grass and used underwater vacuum hoses to recover/suck submerged oil from the water column and or bottom.
- Deployed sorbent snare along the bottom to passively recover the oil. Limitations included hard-to weigh down the snare.
- Used heavy clamshell or scoop recovery equipment. Limitations included the need for a large vessel platform that could not be used in shallow water.
- Instituted the use of "airlift" recovery systems by divers. Limitations included the system only worked effectively in deep waters (deeper than 15 feet).
- Increased vacuum recovery rates by mobilizing more equipment and divers. Utilized a 4" suction hose with a 2" stinger for diver control. Limitations included the stinger was often times omitted due to the frequency of clogging.
- Increased hydraulic sludge pump recovery rates by mobilizing more equipment and divers.
- Instituted the use of dredge recovery equipment. Dredging posed formidable logistical problems and increased cost; however, the anticipated recovery rates outweighed these disadvantages.

Vessels: As a result of the USCG and MTSA of 2004, requirements for non-tank vessels operating with Group V oils as fuel are identified in Navigation Vessel Instruction Circular (NVIC) 01-05, Change – 1, titled Interim Guidance for the Development and Review of Response Plans for Non-tank Vessels. The NVIC applies to U.S. flag, Self- Propelled, NonTank Vessel ≥ 400 GT carrying oil of any kind as fuel for main propulsion. These requirements also apply to foreign flag vessels meeting the tonnage and oil criteria when operating on the navigable waters of the United States.

Specifically required within the NVIC, vessels which have Group V oils with a capacity over 2,500 barrels are required:

- Remote sensing, sonar or other similar methods to locate submerged oil.
- Dredges, Pumps or other equip to recover oil from the bottom.
- Response resources should be capable of being deployed within 24 hours of discovery of discharge to the port nearest the area where the vessel is operating.

Non-Tank Vessels and Facility Response Plans handling Group V oils must identify response resources that may be called upon to respond to a Group V oil spill. Non- Marine: Marathon Petroleum Company (MPC) is the largest domestic producer of asphalt, averaging 83,000 barrels per day asphalt production nationwide. Asphalt must be kept hot to remain a liquid and is generally shipped at temperatures exceeding 300 degrees Fahrenheit via barge, rail or truck. Pipelines cannot be used to move this product great distance's efficiently due to temperature constraints. MPC markets asphalt through 33 owned and operated or leased terminals located throughout the Midwest and Southeast. The MPC customer base includes approximately 900 asphalt paving contractors, government entities (states, counties, cities, and townships) and asphalt roofing shingle manufacturers.

4800 REQUIRED CORRESPONDENCE, PERMITS & CONSULTATION

There are a number of documents that are required from the USCG, USEPA, and other federal and state agencies. These include:

- Notice of Federal Interest for a Pollution Incident (NOFI)
- Authorization to Proceed (ATP); ATP Authorization Message; Obligation of Funds Message
- NPFC Notice of Designation
- Letter of Assumption
- Sample SITREP-POLREP
- Sample PRFA
- Sample CERCLA Administrative Order
- SCAT Forms
- Sample Press Release

4810 FEDERAL/STATE PERMIT REQUIREMENTS (WILDLIFE)

Federal and state permits generally allow the permit holder to collect, transport, possess, rehabilitate, euthanize, release, or band migratory birds. Some permit holders also have authority to handle threatened and endangered species under separate federal permits.
Each of these permits may encompass more than one species. If a bird were considered to be migratory, but also threatened or endangered, it must be covered under a threatened or

endangered species permit. If rescue and rehabilitation efforts are deemed to be necessary and worthwhile, the following federal permits apply:

Migratory Bird	Banding or Marking: (50 CFR 21.22)	A permit is required before any migratory bird is captured for the purpose of banding or marking.
	Special Purpose: (50 CFR 21.27)	May be issued for special purpose activities related to migratory birds, their parts, nests, or eggs.
Eagle Permits	(50 CFR 22)	These permits authorize the taking, possession, or transportation of bald eagle or golden eagles, or their parts, nests, or eggs for scientific or exhibition purposes.
Endangered Species	(50 CFR 17.22 & 17.32)	Permits are for scientific purposes, enhancement of propagation or survival, or for incidental take.

4820 FEDERAL/STATE PERMIT REQUIREMENTS (DISPOSAL)

See Section 3240. [See GRPs]

4830 FEDERAL/STATE PERMIT REQUIREMENTS (DREDGING)

Dredge permits are issued pursuant to Section 10 of the Rivers and Harbors Act of 1899, and Section 404 of the Clean Water Act (CWA), among several others. Dredging Permits are issued by the USACE Great Lakes and Ohio River Division Regulatory Program Manager through the District Offices. The contact information for the District Offices is located in the [GRPs] and at http://www.usace.army.mil/locations.aspx.

4840 FEDERAL/STATE PERMIT REQUIREMENTS (DECANTING)

See Section 3240.2.

4900 MARINE TRANSPORTATION SYSTEM RECOVERY UNIT (MTSRU)

The MTSRU is created for every incident that significantly impacts the Marine Transportation System (MTS). It will function alongside the resources, situation, documentation, and demobilization units. The MTSRU will track and report on the status of the MTS, understand critical recovery pathways, recommend courses of action, and provide all MTS stakeholders an avenue of input to the response organization. The MTSRU should be prominent in the regular

ICS planning cycle, including the situational brief, setting incident objectives, and allocating response resources.

The Marine Transportation Recovery Unit Leader (MTSL) is responsible for planning infrastructure recovery for Transportation Security Incidents (TSI) and other incidents that significantly impact the 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. The MTSL prepares transportation data for the SITL and daily situation briefs applying core Essential Elements of Information (EEIs). The major responsibilities of MTSL are:

- Support the Operation Section Staff elements established for MTS recovery.
- Identify, track, and report impacts to the MTS IAW EEIs.
- Coordinate and consult with MTS stakeholders. Solicit periodic and standardized feedback from impacted industries/stakeholders.
- Identify resources, agencies involved, and courses of action for recovery of public infrastructure such as ATON, communications systems, and federal channels.
- Prioritize recovery operations (including ATON, dredging, salvage, cleanup, repair, etc) as appropriate.
- Monitor economic consequences of recovery actions.
- Develop traffic management plans. Identify the need for and prepare any special advisories or orders (i.e. safety/security zone).
- Assess the need for MTS relief measures outside the impacted area. Implement measures (i.e. redirect cargos, establish alternate transportation modes) as necessary.
- Liaise with MTS Response Branch Director to execute operational objectives.

The MTSRU may liaison with a port coordination team or similar interagency/industry group currently established in the ports, and may be located and staffed as deemed appropriate by the IC/UC. In incidents that impact more than one port, Sector, or are of greater significance, District Commanders should include a MTSRU in the District response organization to help manage regional MTS issues, including impacts felt outside of the immediate response area.

Additional information regarding this position under ICS can be found in Chapter 8 of the USCG IMH.

5000 LOGISTICS

5010 LOGISTICS SECTION ORGANIZATION

Additional information regarding Logistics Section organization can be found in Chapter 10 of the USCG IMH.

5100 LOGISTICS SECTION CHIEF (LSC)

The LSC is a member of the General Staff and is responsible for providing facilities, services, and material in support of the incident. The LSC participates in development and implementation of the IAP and activates and supervises Branches and Units within the Logistics Section. Duties include:

- Plan the organization of the Logistics Section.
- Assign work locations and preliminary work tasks to Section personnel.
- Notify the Resource Unit of the Logistics Section units activated, including names and locations of assigned personnel.
- Assemble and brief Logistic Branch Directors and Unit Leaders.
- Determine and supply immediate incident resource and facility needs.
- In conjunction with the Command, develop and advise all Sections of the IMT resource approval and requesting process.
- Review proposed tactics for upcoming operational period for ability to provide resources and logistical support.
- Identify long-term service and support requirements for planned and expected operations.
- Advise IC/UC and other Section Chiefs on resource availability to support incident needs.
- Identify resource needs for incident contingencies.
- Coordinate and process requests for additional resources.
- Request and/or set up, expanded ordering processes as appropriate to support incident.
- Develop recommended list of Section resources to be demobilized and initiate recommendation for release when appropriate.
- Receive and implement applicable portions of the incident Demob Plan.
- Ensure the general welfare and safety of Logistic Section personnel.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5110 LOGISTICS SECTION PLANNING CYCLE GUIDE

The LSC is responsible for certain components of the IAP development. Certain meetings, briefings, and information gathering during the Planning Cycle lead to the IAP that guides operations for the next operational period. The meetings and events directly relevant to assembling the IAP are described in Chapter 3 of the USCG IMH. The IC/UC specifies the operational periods.

5200 SUPPORT BRANCH

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

- Identify Support Branch personnel dispatched to the incident.
- Determine initial Support operations in coordination with the LSC and SUBD.
- Prepare initial organization and assignments for support operations.
- Assemble and brief Support Branch personnel.
- Determine if assigned Branch resources are sufficient.
- Maintain surveillance of assigned Units work progress and inform the LSC of their activities.
- Resolve problems associated with requests from the Operations Section.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5210 SUPPLY UNIT

The Supply Unit Leader (SPUL) is primarily responsible for receiving, storing and distributing all supplies for the incident; maintaining and inventorying of supplies; and storing, disbursing and servicing non-expendable supplies and equipment. Duties include:

- Participate in Logistics Section/Support Branch planning activities.
- Determine the type and amount of supplies en route.
- Review the IAP for information on operations of Supply Unit.
- Develop and implement safety and security requirements.
- Order, receive, distribute and store supplies and equipment.
- Receive and respond to requests for personnel, supplies and equipment.
- Maintain an inventory of supplies and equipment.
- Service reusable equipment.
- Submit reports to the SUBD.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5210.1 OIL AND HAZARDOUS SUBSTANCES RESPONSE EQUIPMENT

USCG Response Resource Inventory System (RRI) for BOA Contractors and OSROs (registration required).

USCG response equipment inventory for the AOR is maintained by D9 DRAT. The resources within the inventory are managed and maintained by D9 DRAT and each FOSC within the district.

5220 FACILITIES UNIT

The Facilities Unit is primarily responsible for the set up, maintenance and demobilization of incident facilities, e.g., Base, ICP and Staging Areas, as well as security services required to support incident operations. Duties include:

- 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 pre-existing damage.
- Determine requirements for each facility including the ICP.
- Prepare layouts of incident facilities.
- Notify Unit Leaders of facility layouts.
- Activate incident facilities.
- Provide Facility Managers and personnel to operate facilities.
- Provide sleeping facilities; security services and food and water services.
- Provide sanitation and shower service as needed.
- Provide facility maintenance services e.g. sanitation, lighting, clean up, trash removal, etc.
- Inspect all facilities for damage and potential claims.
- Demobilize incident facilities.
- Maintain facility records.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

The Facilities Unit provides sleeping and sanitation facilities for incident personnel and manages Base operations. Besides contracting with local hotels or motels for sleeping arrangements, contacting the local EMA Directors and using their County Resources Manual may expedite locating several of these requirements.

5230 VESSEL SUPPORT UNIT

The Vessel Support Unit is responsible for implementing the Vessel Routing Plan for the incident and coordinating transportation on the water and between shore facilities. Since most vessels will be supported by their infrastructure, the Vessel Support Unit may be requested to

arrange fueling, dockage, maintenance and repairs of vessels on a case by case basis (see Section 5220). Duties include:

- Participate in Logistics Section/Support Branch planning activities.
- Coordinate the development of the vessel routing plan.
- 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 an inventory of support and transportation vessels.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5240 GROUND SUPPORT UNIT

The Ground Support Unit is primarily responsible for ensuring repair of primary tactical equipment, vehicles, mobile ground support equipment and fueling services; transportation of personnel, supplies, food and equipment in support of incident operations; recording all ground equipment usage time, including contract equipment assigned to the incident; and implementing the Traffic Plan for the incident. Duties include:

- Participate in Logistics Section/Support Branch planning activities.
- Develop and implement the Traffic Plan.
- Support out-of-service vessel resources.
- Notify the Resource Unit of all status changes on support and transportation vehicles.
- Arrange for and activate fueling, maintenance and repair of ground resources. •

  Maintain Support Vehicle Inventory and transportation vehicles (ICS-218)
- Provide transportation services IAW requests from LSC or SUBD.
- Collect use information on rented equipment.
- Requisition maintenance and repair supplies, e.g. fuel, spare parts.
- Maintain incident roads.
- Submit reports to SUBD as directed.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5300 SERVICE BRANCH

The Service Branch Director (SVBD), when activated, is under the supervision of the LSC, and is responsible for the management of all service activities at the incident. The SVBD supervises the operations of the Communications, Medical and Food Units. Duties 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 IAP
- Organize and prepare assignments for Service Branch personnel.
- Coordinate activities of Branch Units.
- Inform LSC of Branch activities.
- Resolve Service Branch problems.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5310 FOOD UNIT

The Food Unit Leader (FDUL) is responsible for supplying the food needs for the entire incident, including all remote locations, e.g., Staging Areas, as well as providing food for personnel unable to leave tactical field assignments. Duties include:

- Determine food and water requirements (for Responders/IMT/UC).
- Determine the method of feeding to best fit each facility or situation.
- Obtain necessary equipment and supplies.
- Ensure that well-balanced meals are provided.
- Order sufficient food and potable water from the Supply Unit.
- Maintain and inventory of food and water.
- Maintain food service areas, ensuring that all appropriate health and safety measures are being followed.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5320 MEDICAL UNIT

The Medical Unit under the direction of the SVBD, if established, or the LSC, and is primarily responsible for the development of the Medical Plan; providing medical care and overseeing health aspects 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 report and records. Duties include:

- Participate in Logistics Section/Service Branch planning activities.
- Establish the Medial Unit.
- Prepare the Medical Plan (ICS-206).
- Provide any relevant medical input into the planning process for strategy development.
- Coordinate with SOFR, Operations, Hazmat 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 form origin, care facility and 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 aspects of incident personnel including excessive incident stress.
- Respond to requests for medical aid, medical transportation, and medical supplies.
- In conjunction with Finance/Admin Section, prepare and submit necessary authorizations, reports, and administrative documentation related to injuries, compensation or death of incident personnel.
- Coordinate personnel and mortuary affairs for incident personnel fatalities.
- Provide oversight and liaison as necessary for incident victims among emergency medical care, medical examiner and hospital care.
- Provide for security and proper disposition of incident medical records.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

5400 COMMUNICATIONS UNIT

[See 9700 Annex for D9 Communications Plan]

This section is general in content. The details for each geographic region in the Eastern Great Lakes are located in the corresponding GRP and the 9700 Annex. The Communications Unit is responsible for developing plans for the effective use of incident communications equipment and facilities; installing and testing communications equipment; supervision of the Incident Communications Center; distribution of communications equipment to incident personnel; and maintenance/repair of communications equipment. Duties include:

- Determine Unit personnel needs.
- Prepare and implement the Incident Radio Communications Plan (ICS-205)
- Ensure the Incident Communications Center and the Message Center is established.

- Establish appropriate communications distribution/maintenance locations within the Base.
- Ensure communications systems are installed and tested.
- Ensure an equipment accountability system is established.
- Ensure personal portable radio equipment from cache is distributed per Incident Communications Radio Plan.
- Provide technical information as required on:
  - Adequacy of communications systems currently in operation. - Geographic limitation on communications systems - Equipment capabilities/limitations.
  - Amount and types of equipment available.
  - Anticipated problems in the use of communications equipment.
- Supervise Communications Unit activities.
- Maintain records on all communications equipment as appropriate.
- Ensure equipment is tested and repaired.
- Recover equipment from Units being demobilized.

Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

USCG VHF Frequencies:

Channel	**Frequency**	**Comments**
Marine Band Channel 81A	157.075 MHZ	A primary USCG operating frequency. Channel 81A is also the national marine pollution response coordination channel. This channel is a primary means of radio communications between the command, field teams, and contractor teams in pollution cases.
Marine Band Channel 83A	157.175 MHZ	USCG Auxiliary primary operating channel. COTP may preempt the use of this channel in emergencies.
Marine Band Channel 22A	157.100 MHZ	Primary USCG public liaison channel. Urgent marine broadcasts are announced on Ch 16 and are broadcast on 22A. During a pollution case, 22A may be used by USCG Stations to inform mariners of waterway hazardous conditions or restrictions.
Marine Band Channel 16	156.800 MHZ	International hailing and distress frequency. In a pollution case, 16 may be used by USCG Sector to alert mariners to urgent COTP information on Channel 22A. Only in the most extreme cases would MSU broadcast information directly on 16. NOTE: FCC regulations prohibit the use of Channel 16 by land mobile stations and non-SAR land fixed stations.

Marine Band Channels 21A and 23A	157.050 MHZ 157.150 MHZ	USCG operational channels controlled by the Sector Commander. During a pollution case or marine incident, information exchanged on these channels is relayed to command, unless conditions sufficiently urgent to require direct COTP use.
USCG Command and Control Channels	Various	USCG to USCG tactical communications.

Communications Capabilities:

Communications System	**Comments**
Portable Communications Trailers	Transportable Communications Center (TCC) units are self-contained, prepositioned, rapidly deployed USCG maintained communications modules that operate in the HF, VHF, and UHF bands. They can be used for ground to air, ground to ship, and point to point non-secure communications. The TCC consists of an air equipment shelter/trailer with installed electronic equipment and one portable generator. The use of this equipment shall be requested through CG District Nine Command Center at (216) 902-6117 (24 hours).
Teleconference Capability	The NRC is capable of establishing a teleconference of up to 60 participants. The system is intended for use in support of emergency response operations, but can be made available on a limited basis for routine matters. FOSCs and the RRT Chairs may request establishment of a teleconference by contacting the NRC Duty Officer at (800) 424-8802. UC staff may request emergency conferences at any time, but should provide one-day advance notice whenever possible. FEMA has a dedicated teleconference system. Contact FEMA Response and Recovery Division V at (312) 408-5500. CG District Nine Command Center at (216) 902-6117 (24 hours) has a teleconference line.
Cell Phones	FOSCs, their representatives, and most state and local response organizations are issued and utilize cell phones. It should be noted there is limited coverage in more remote areas.
Telefax/Scanners	Facsimile transmission is used to exchange complex information quickly and accurately to response agencies, technical experts and personnel with a need to know. Most agencies have a dedicated fax machine. Presently, scanned documents sent though computer systems seem to be used more frequently than facsimile.
Computer Communications Systems	Email allows direct and succinct information to be communicated to most individuals/agencies at anytime. Files, data, photos, and other information can be attached to standard messages. Email communication eliminates back-ups and busy signals on fax and phone lines; multiple communications can be forwarded simultaneously; data transfer is close to real-time. NOAA's First Class E-Mail system is an electronic communication network. Email can be sent or received between RRT and NRT members, contractors, and state and federal spill response agencies with accounts on the system.

USCG CAMSLANT C3I Deployable Contingency Communications (cont)	**Transportable Multi-Agency Communication Central (TMACC)** Developed to support joint and multi-agency operations, with a broad range of C3I systems to provide interoperability (ACU1000) with DOD, Customs, DEA and Local/State government officials. It is ground and air (via C130) transportable. Request procedures on page 5000-28. **Enhanced Mobile Incident Command Post (EMICP)** Provides a self sustaining command and control platform accommodating up to 20 operators in the conference room and 3 operators in the communications space. The communications space is configured to provide communications over VHF/UHF/HF frequencies (ACU-1000 provides OGA interoperability), MILSATCOM, as well as land line connectivity. Request procedures on page 5000-28. **Mobile Communications Vehicle (MCV)** MCV is a contingency communications platform capable of deploying on short notice 24/7 in support of natural disasters, homeland security operations, as well as various SAR, LE and COTP operations. The MCV is fully equipped to handle multi-agency missions and is designed to accommodate up to 2 personnel. It is C130 deployable. Request procedures on page 5000-28. **106' Portable Multipurpose Antenna Tower (MPAT)** MPAT can be used in conjunction with the MCV, TMACC, or the EMICP to increase line of site capabilities or on its own as a temporary high site replacement. As with the MCV, TMACC, and EMICP the tower utilizes the ACU-1000 as its interoperability solution. Request procedures on page 5000-28.
USCG CAMSLANT C3I Deployable Contingency Communications	**LANTAREA additional C31 Equipment/Systems (Radios, Antennas, SATPHONES, etc)** Detailed information on the capabilities of LANTAREA Comms Cache can be found at https://cgportal2.uscg mil/units/camslant/SitePages/No%20Call%20Unanswered. aspx Or contact LANTAREA//LANT-36// at (757) 398-6338 during normal work hours. **Portable SIPRNET Kit (PSK)** The PSK is comprised of a secure network, Laptops and a satellite Antenna in Flyaway cases to rapidly access SIPRNET resources in the field. When used in concert, these assets from the MCC System of Systems and provide the C4 and its resources necessary to establish, replace or augment a CG presence in the field. Request procedures on page 5000-28.

Requests for Deployable C3I equipment for planned operations must be submitted at least 30 days in advance via message to COMLANTAREA COGARD PORTSMOUTH VA//LANT-3/LANT-36//, INFO COGARD CAMSLANT CHESAPEAKE VA; via the District Commander.

Funding for the deployment of the MCV, TMACC, and MAPT is provided by the requesting unit to include TAD expenses for operators and technicians, fuel for generators and trucks, costs incurred from the use of commercial satellite services. Aircraft expenses, if required are the responsibility of the providing AIRSTA as directed by LANTAREA//LANT-3R//. Funding for the development of the EMICP/MCV is coordinated through LANTAREA//LANT-36//.

Manning: MCV, TMACC, EMICP, MPAT, PSK deploy with a combination of OS, ET, IT and MK support. This core crew transports the asset, completes initial set up, and remains on scene throughout the duration of the deployment to train supplemental watch standers

and for troubleshooting purposes. The requesting District is responsible for providing TONO's to cover TAD costs for the core crew (CAT Team) from CAMSLANT and for supplemental TAD personnel required for watch standing during ongoing operations.

Meals and lodging expenses for TAD personnel must also be considered. If commercial power is not available diesel fuel will be required to power generators. Oily waste disposal may be required.

Short notice emergency requests for Deployable Communications Equipment can be initiated via to CG LANTAREA (LANT-36). Phone inquires about CAMSLANT's Deployable Communications Equipment/Services can be directed to CAMSLANT's CAT Team Supervisor at (800) 742 8519 (option 0) after normal working hours or email CML-DG-CAT at CML-DG-CAT@USCG.MIL.

Submit message request for Deployable Communications support as follows:

FM (REQUESTING COMMAND) TO (DISTRICT COMMANDER)
COMLANTAREA COGARD PORTSMOUTH VA//LANT-3/LANT-36//
INFO COGARD CAMSLANT CHESAPEAKE VA
COGARD SILC NORFOLK VA//T/TE-1/TS-2// (OTHER ADDEES AS REQUIRED)
B T UNCLAS //N02014// MSGID/GENADMIN/COMMAND NAME/-// SUBJ/C3 EQUIPMENT REQUEST//
POC/UNITS POC/UNIT/PRIPHONE/SECPHONE/EMAIL ADDRESS//
RMKS/1. REQUEST AUTHORIZATION TO UTILIZE THE FOLLOWING CONTINGENCY COMS EQUIP IN SUPPORT OF (PENDING OPERATIONS, TRAINING, EXERCISES, ETC.):

A. EQUIPMENT: (MCV, TMACC, EMICP, MPAT, PSK)
B. PERIOD OF REQUIREMENT: (I.E. 01 JAN - 25 JAN 10)
C. DEPLOYMENT LOCATION: (I.E. CLEVELAND, OH)
D. COMMUNICATIONS REQUIREMENTS: (BRIEFLY SUMMARIZE CONCEPT OF OPERATIONS AND COMMUNICATIONS REQUIREMENTS NEEDED TO MEET OBJECTIVE).

E. FUNDING: (TONO FUNDING LINE OF ACCOUNTING REQUIRED TO SUPPORT TAD AND OPERATIONAL COSTS OF PERSONNEL DEPLOYED IN SUPPORT OF MCV/TMACC/EMICP/MPAT/PSK. EACH ASSET DEPLOYS WITH AT LEAST ONE COMMUNICATIONS SUPERVISOR FOR TRAINING PERSONNEL AND ONE ELECTRONICS TECHNICIAN FOR EQUIPMENT SUPPORT. IF AUXILIARY POWER (DIESEL/GAS GENERATORS) WILL BE USED, APPROPRIATE COST WILL BE BASED ON USAGE TIME AND CURRENT COST OF FUEL.)

F. ITINERARY: (IF KNOWN, LIST DATES FOR PLANNING AND EXECUTION PHASES OF MISSION AND/OR OPERATION)
2. MISCELLANEOUS INFORMATION: (AS REQUIRED)
B/T

5410 COMMUNICATIONS SUPPORT

Unit or Activity	Phone Number(s)
Ninth Coast Guard District Comms Center	(216) 902-6117

CAMSLANT (Deployable Contingency Command, Control and Communications, - C3I Equipment	(757) 421 6288/6253/6207 (757) 398 6499/6338 (800) 742 8519 (Option 0) After Hours
LANTAREA//LANT-36	(757) 398-6338
ESU Cleveland	(216) 902-6115 (Telecomms)
TISCOM	(800) 847-2479
Atlantic Strike Team Comms Trailer	(609) 724-0008/0009

5410.1 RADIO AMATEUR CIVIL EMERGENCY SERVICE (RACES)

Radio Amateur Civil Emergency Service (RACES) is a public service that provides a reserve communications group within government agencies in times of extraordinary need. During periods of activation, RACES personnel are called upon to perform many communications related tasks for government agencies they serve. Although the exact nature of each, activation, will be different, the common thread is communications. The Federal Communications Commission (FCC) is responsible for the regulations of RACES operations. The Amateur Radio Regulations, Part 97, Subpart F, were created by the FCC to describe RACES operations in detail.

Traditional RACES operations involve emergency message handling on Amateur Radio Service frequencies. These operations typically involve messages between critical locations such as hospitals, emergency services, emergency shelters, and any other locations where communication is needed. These communications are handled in any mode available, with 2 meters FM being the most prevalent.

Whatever need arises, trained RACES personnel are ready and prepared to help. RACES groups develop and maintain their communications ability by training throughout the year with special exercises and public-service events.

5500 USCG BASE CLEVELAND SUPPORT

Base Cleveland coordinates all regional mission support activities in the Ninth District. The Base is a regional command that provides logistics, engineering, administrative, financial, purchasing, and health care services to USCG units throughout the entire eight state Great Lakes region. The Base Commander synergizes field support delivery, establishes local command unity, and integrates the technical authority of logistics and service centers, product and service lines, and local, coordinated service delivery. In a regional contingency, the Base Commander serves as the District Commander's DCMS staff element. [Link to Base Cleveland]

5510 ESU/NESU CLEVELAND

Contact information for ESU/NESU Cleveland:

- ESU Command/C4IT (216) 902-6155

- Command Duty Officer (216) 536-2619
- NESU Command/Naval Engineering (216) 902-6190

6000 FINANCE/ADMINISTRATION

6010 FINANCE/ADMINISTRATION SECTION ORGANIZATION

The Finance/Administrative Section is responsible for all administrative and financial considerations on an incident. This includes Time Unit, Procurement Unit, Compensation/Claims Unit, and Cost Unit. The IC/UC will determine the need for a Finance/Admin Section and designate a qualified individual to fill the role of Finance Section Chief (FSC). The Finance/Admin Section is generally set up for any incident that may require on-site financial management.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

If the response is not funded by the RP the Finance/Admin Section will ensure contractors are paid in a timely fashion IAW National Pollution Funds Center (NPFC) protocols, process and pay claims as appropriate and reimburse the response costs of government agencies as appropriate. The FSC may request assistance from the NPFC for claims processing.

The following key references in concert with this ACP should be consulted directly for specific issues that arise throughout this section:

- NPFC User Reference Guide
- NPFC Finance and Resource Management Field Guide
- USCG Cost Documentation Forms and Incident Report (Excel Spreadsheets)
- Marine Safety Manual, Volume IX, Marine Environmental Protection Manual

6100 FINANCE SECTION CHIEF

The Finance/Admin Section Chief is the primary financial advisor to the Incident Commander and oversees the operation of the Finance Section. The FSC is a member of the General Staff and is responsible for all financial, administrative and cost analysis aspects of the incident and for supervising members of the Finance/Admin Section. The FSC may have Deputy FSCs' who may be from the same agency or from an assisting agency. The Deputy FSC must have the same qualifications as the person for whom they work, as they must be ready to take over that position at any time. Duties include:

- Review operational plans and provide alternatives where financially appropriate.
- Manage all financial aspects of an incident.
- Provide financial and cost analysis information as requested.
- Gather pertinent information from briefings with responsible agencies.

- Develop an operating plan for the Finance/Admin Section; fill supply and support needs.
- Meet with assisting and Cooperating Agency Representatives, as needed.
- Maintain daily contact with agency(s) administrative headquarters on Finance/Admin matters.
- Ensure that all personnel time records are accurately completed and transmitted to home agencies, according to policy.
- Provide financial input to demobilization planning.
- Ensure that all obligation documents initiated at the incident are properly prepared and completed.
- Brief agency administrative personnel on all incident-related financial issues needing attention or follow-up prior to leaving incident.
- Develop recommended list of Section resources to be Demobed and initial recommendation for release when appropriate.
- Receive and implement applicable portion of the incident Demobilization Plan.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

6200 FUND USE

Under the NCP the FOSC is charged with directing response efforts and coordinating all other efforts at the scene of a discharge or release of oil or a hazardous substance. The FOSC is delegated authority to ensure that only those actions whose primary purpose is to ensure effective and immediate removal and mitigation of a discharge of oil or a hazardous material or a substantial threat of a discharge of oil or hazardous material are undertaken. These actions must be consistent with the NCP. Only approved actions may be reimbursed by the OSLTF or CERCLA fund.

- From the outset of any response, the FOSC should establish whether federal, state, tribal, local or contracting resources are necessary for removal actions. This includes the utilization of OGA's technical expertise and supporting services, either organic to the organization or through contract mechanisms.
- The IC/UC, when weighing the assistance of OGS's must consider the following:
  - Define the scope of the state, tribal, local or federal agencies' expected actions and allow the FOSCs staff to evaluate potential claims against the OSLTF.
  - When a state, local or federal agency responds at the request of the IC/UC, the USCG representative in the Finance/Administration section must execute a PRFA with the agency's financial representative. The PRFA assures the agency will be reimbursed for specific work performed at the FOSCs request.

The [9700 Annex] contains sample documents for PRFAs.

Other considerations of the OSLTF and CERCLA involve damage claims, equipment restoration and spills from other federal agencies.

- The NCP places responsibility for spills from federal vessels and installations on the owning federal agency to use its own funding.
  - However, the FOSC can use the OSLTF as a last resort to clean up or prevent oil discharges. When the responsible federal agency is capable of funding the clean up, the FOSC should attempt to establish a Military Interdepartmental Purchase Request (MIPR) or equivalent to reimburse the use of FOSC and OGA pollution response equipment and personnel time.
- Claims of damage may be submitted for reimbursement (when approved) from the OSLTF. Often, such damage claims include the costs of restoring a vessel, facility, etc., to operation (as in the case of a third-party vessel which is oil contaminated as a result of the spill). Actual decontamination of a vessel, facility, or other installation may also reasonably be a removal action (i.e., to prevent further human health, economic or environmental damage).
- The OSLTF may be used to restore pollution response equipment to inventory in the condition it was in before the response. Items used up in the response (consumables) or damaged beyond economical repair may be replaced.
- Discharges from oil tanks and related facilities often cause extensive subsurface or groundwater contamination. When underground contamination has migrated so as to cause an actual surface discharge or substantial threat of a discharge into navigable waters, the OSLTF may be used for removal. When these imminent threat or actual discharge conditions are not met, the incident is considered a hazardous materials incident ashore under municipal, county, and state hazardous material discharge rules.
- Many if not all of the agencies and organizations responding to a spill will have prearranged sources of supply and service, and all will have legal and procedural limitations on procurements. While the emergency elements of the response may expedite procurements, it does not eliminate the rules governing procurement.
- In a large response, there is significant possibility that the RP's limits of financial responsibility will be exceeded, opening the possibility that the response may transition entirely to FOSC /SOSC control.

6210 FOSC ACCESS TO OSLTF AND CERCLA

The OSLTF and CERCLA are accessed by obtaining a Federal Project Number (FPN) (for oil spills) or CERCLA Project Number (CPN) (for hazardous substance releases) using the Ceiling and Number Assignment Processing System (CANAPS).

6210.1 OSLTF

The OSLTF applies to funding responses only when the following two conditions are both met:

- There is a discharge of oil (as defined in 33 USC Section 2701(23)), or a substantial threat of a discharge of oil:
  - Into the navigable waters
  - On the adjoining shorelines
  - Into the waters of the exclusive economic zone
  - That may affect natural resources under exclusive management authority of the United States
- There are further actions necessary to ensure effective and immediate removal, mitigation or prevention of the substantial threat under OPA 90 the FOSC may allow the responsible party to continue all response efforts within their capability. The FOSC may simultaneously secure and direct additional response efforts using contractors or government personnel and equipment.

6210.2 CERCLA

The CERCLA funding for responses generally applies when the following three conditions are all met:

- A hazardous substance (not oil under 33 USC 2701(33)) has been released, or there is substantial probability that it will be released
- The release (or probable release) presents an imminent and substantial threat to the public health or welfare
- 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.

The FOSC can obligate no more than $250,000 per incident without an approved Action Memorandum. There is no CERCLA funding for compensation payments to claimants damaged by hazardous substances.

6300 PROCUREMENT PROCESSES AND PROCEDURES

Upon obtaining an FPN or CPN, the FOSC can determine whether assistance is needed from a spill response contractor or a federal, state, tribal or local agency.

6400 TRUSTEE ACCESS TO THE OIL SPILL LIABILITY TRUST FUND

Administrative Trustees are organizations with responsibilities for specific areas or natural resources such as the USDOI. OPA 90 authorizes these organizations access to the fund through one administrative trustee known as the Lead Administrative Trustee (which must be a federal agency.) The designation of Lead Administrative Trustee is made for each spill based on the involvement of each organization. Administrative trustee access to the emergency fund would most likely be limited to beginning the natural resource damage assessment process.

6410 STATE ACCESS

6410.1 STATE ACCESS TO FUND – DIRECT AND INDIRECT

Section 1012(d)(1) of OPA 90 provides that the President, upon request of the Governor of a state or his or her designated state official, may obligate the OSLTF for payment in an amount not to exceed $250,000 per incident for removal costs consistent with the NCP.

The SOSC may access the OSLTF directly by contacting the cognizant FOSC, and indicating that they are making a request for direct access to the Fund (this person must be designated, in writing, by the Governor of the state, and on file at the NPFC). The FOSC makes a determination that the request is authorized or not, and contacts the NPFC and District (R) by the following workday. If the request is authorized, the FOSC forwards the request to the NPFC to obtain a FPN. The CANAPS product set will forward the FPN/Cost Ceiling to the state, with a copy to the FOSC. CANAPS: http:// www.uscg.mil/ccs/npfc/Response/default.asp.

The removal costs must be required for the immediate removal of a discharge, or the mitigation or prevention of a substantial threat of discharge, of oil. Pursuant to the authority delegated to the USCG in Executive Order 12777, the USCG has published a regulation (33 CFR 133) to implement the provisions of section 1012(d) (1) of OPA 90.

When the FOSC determines that another agency (federal, state, tribal or local) can assist in a removal effort, the FOSC may authorize that agency to perform removal actions under its direct supervision. In these situations, the FOSC issues a PRFA to the state to establish a contractual relationship and obligate the Fund. In this method the state is not limited to $250,000 per incident and the FOSC is actively directing the state's response actions.

6420 STAFFORD DISASTER RELIEF & EMERGENCY ASSISTANCE ACT FUNDING

In the event of a Presidential declared disaster, when the NRF is activated to assist an impacted state, the use of the Robert T. Stafford Disaster Relief and Emergency Assistance Act fund may be authorized. The Fund reimburses allowable costs incurred in support of activities under an Emergency Support Function (ESF). A complete listing of ESFs is on page 1000-26 of this plan.

Under the Stafford Act http://www.fema.gov/pdf/about/stafford act.pdf, the USCG FOSC may receive direct tasking in the form of a Mission Assignment, a work order issued by the FEMA (or other designated agency), directing the recipient agency to complete a specified task. ESF #10 – Hazardous Materials Response Annex of the NRF includes both oil and hazardous materials response activities. In the execution of a mission assignment, the FOSC will use existing funds, resources, and contracts for goods and services to complete the task. The FOSC will then review the actual expenses against the estimated costs and make payments to OGA and private vendors for each cost. For oil spills and hazardous materials releases, the FOSC will

receive a "Request for Federal Assistance" from FEMA or the ESF lead agency, including a cost ceiling, and will then proceed to respond as normal using the OSLTF or CERCLA funds as applicable, including the "Request for Federal Assistance" form in the cost documentation. It is important to recognize that Stafford Act funds, like OSLTF and CERCLA funds, may only be applied to response costs directly related to the tasking and the Stafford Act ceiling must be managed carefully just as other fund ceilings.

6420.1 STAFFORD ACT FUND USE CRITERIA

- There must be a Presidential Declaration of Disaster (natural or other).
- The affected state that has requested assistance will contribute matching funds.
- FEMA has to issue a Mission Assignment (MA) to the USCG identifying the work to be done and authorized spending.
- Use of Stafford Act differs from typical pollution response. States are expected to deal with most problems, and the federal government only becomes involved when state resources are not sufficient for the disaster response. • Stafford Act responses can be geographically limited (e.g., certain counties in a state).

6420.2 LEGAL/REGULATORY FRAMEWORK FOR RESPONSE

- When the President issues a Disaster Declaration, FEMA establishes a senior official as the Federal Coordinating Officer (FCO). The FCO determines which parts of the NRF will be activated and which actions the federal government will support.
- The FCO is paired with a state counterpart, the State Coordinating Officer (SCO), and the two, working together, oversee the combined state/federal response.
- The SCO also must approve all MA, since the state normally must provide matching resources or funds (10%-25%) for every Stafford Act dollar spent.
- Under certain circumstances, the Presidential Declaration may waive the matching fund requirement. (e.g., this was done for the World Trade Center and the Shuttle Columbia responses).

6420.3 NON-COAST GUARD PARTICIPANTS

- The funding process for Stafford Act Pollution Response (ESF-10), from the FOSC perspective is similar but not identical to oil or hazardous material responses.
- USCG Stafford Act responses must have an approved FEMA Mission Assignment (MA) in place or the USCG cannot seek reimbursement after the response is completed. The FEMA MA defines what is to be done, where, and sets a spending limit.

- When the FOSC utilizes Stafford Act Funds, most of the resources of the NCP are at his/her disposal, including contractors and other federal agencies (but not state or local agencies).
- The FOSC can hire contractors through BOAs.
- The FOSC can provide funding to federal government responders through incidentspecific PRFAs (but not state or local agencies).
- The Stafford Act provides separate and distinct claims procedures for Third Party claims within its overall disaster response system in the FRP.

6500 COST UNIT

The Cost Unit Leader (COST) is responsible for collecting all cost data, performing cost effectiveness analyst and, providing cost estimates and cost saving recommendations for the incident. Duties include:

- Coordinate with agency headquarters 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 recommendation to the FSC.
- Ensure all cost documents are accurately prepared.
- Maintain cumulative incident cost records.
- Complete all records prior to demobilizing.
- Provide reports to the FSC.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

6510 COST DOCUMENTATION PROCEDURES, FORMS, REPORTS

[See FFARM in 9700 Annex]

The Cost Unit tracks response costs against the response ceiling. They collect all obligating documents issued in support of the response and ensure that other expenses such as USCG personnel costs are properly logged. They are responsible for reporting amounts spent and ceiling remaining. They work with the Finance Center to record response costs in the USCG official accounting records and process payments for contractors, other government agencies, and other purchases. The USCG maintains NPFC cost documentation forms that are used to track all government and contractor resources during an oil spill.

In addition to the cost documentation forms, several administrative forms are required by the USCG (if applicable) and are listed below:

- NOFI (all spills into navigable waters)
- Authorization To Proceed
- Notice of Federal Assumption (if applicable)
- Designation of Source (for initiating the claims process)
- PRFAs
- Administrative Directive/Order
- POLREP
- Financial Summary Report
- OSLTF Guidance Information for use during an oil spill (NPFC User's Guide)

6600 TIME UNIT

-
-

The Time Unit Leader (TIME) is responsible for equipment and personnel time recor**d**ing and for managing the commissary operations. Duties include:

- Determine incident requirements for time recording function.

  Determine resource needs.

  Contact appropriate agency personnel/representatives.
- Ensure that daily personnel time recording documents are prepared and in compliance with agency(s) policy.
- Establish time unit objectives.
- 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 form assisting agency personnel to the respective Agency Representative prior to demobilization.
- Brief the FSC on current problems and recommendations, outstanding issues and followup requirements.

The Time Unit is responsible for monitoring all manpower hours allocated to an incident response. They will be aided in this activity by the Operations Section in keeping daily resource reports. The TIME may have subordinate staff to assist on larger incidents. These positions are: Equipment Time Recorder and Personnel Time Recorder. These recorder positions are responsible, under the supervision of the TIME, to oversee the recording of time for all equipment and personnel assigned to the incident. Based on the incident, the TIME may elect to
establish only one recorder responsible for both equipment and personnel. See the Finance/Admin Section organization chart on the following page.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

6700 COMPENSATION/CLAIMS UNIT

The Compensation Unit Leader (COMP) 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. This unit handles “insurance” related matters. It manages any medical costs, death benefits, and personnel claims. It also manages Oil Spill Liability Trust Fund claims when the responsible party is not handling claims. Duties include:

-
-
- Establish contact with the incident MEDL, SOFR and LOFR (or agency representative if no LOFR is assigned.
- Determine the need for Compensation for Injury (INJR) and Claims (CLMS) Specialists and order personnel as needed.
- Establish a Compensation for Injury work area within or as close as possible to the Medical Unit.
- Review Incident Medical Plan (ICS-206).
- Ensure that CLMS have adequate workspace and supplies.
- 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 they are in compliance with agency requirements and policies.
- Ensure that all Compensation for Injury and Claims logs and forms are complete and routed to the appropriate agency for post-incident processing prior to demobilizing.
- Keep the FSC briefed on Unit status and activity.
- Demobilize unit in accordance with the Incident Demobilization Plan.

The COMP may have subordinate staff to assist on larger incidents (see diagram). These positions are: INJR and CLMS. The INJR is responsible for administering financial matters resulting from serious injuries and fatalities occurring on an incident. The CLMS is responsible for managing all claims-related activities (other than injury) for an incident.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

6800 PROCUREMENT UNIT

The Procurement Unit Leader (PROC) is responsible for administering all financial matters pertaining to vendor contracts, leases, and fiscal agreements. Duties include:

- Coordinate with local jurisdiction on plans and supply sources.
- Obtain the incident Procurement Plan.
- Prepare and authorize contracts, building and land-use agreements.
- Draft memoranda of understanding as necessary.
- Establish contracts and agreements with supply vendors.
- Provide for coordination between Ordering Manager (ORDM) and all other procurement organizations supporting the incident.

-
-
- Ensure that a system is in place that meets agency property management requirements. Ensure proper accounting for all new property.
- Interpret contracts and agreements; resolve disputes within delegated authority.
- Coordinate with Compensation/Claims Unit for processing claims.
- Complete final processing of contracts and send documents for payment.
- Coordinate cost data in contracts with the COST.
- Brief FSC on current problems and recommendations, outstanding issues and follow-up requirements.

Additional information regarding this position can be found in Chapter 11 of the USCG IMH.

This unit is staffed with procurement specialists. USCG Shore Infrastructure Logistics Center (SILC) can provide contracting assistance as necessary. SILC is responsible for issuing Delivery

Orders to BOA Contractors after the FOSC issues the ATP. In addition, this staff negotiates non-BOA contract items with commercial contractors to perform activities as required by the FOSC. They will conduct cost and price analysis as necessary to determine reasonable cost and review and approve invoices from contractors.

6810 FOSC FUND AUTHORITY

For response to oil discharge incidents or substantial threats of discharge, the FOSC has discretion to allocate a cost ceiling up to $500,000 against the OSLTF. To increase the obligated ceiling above that amount, the FOSC must contact the NPFC Case Officer/Case Team/CDO. Ceilings cover the following costs:

- Out-of-pocket USCG/USEPA costs
- Contractor costs
- Other Agency costs

The FOSC has the authority to issue ATPs to contractors for amounts up to $25,000. To increase those amounts, contact SILC staff.

For response to a hazardous materials release incident, the FOSC has discretion to allocate a cost ceiling of $250,000. For ceiling amounts exceeding $250,000 per incident, an Action Memo must be approved by the USEPA.

7000 INTELLIGENCE/INVESTIGATIONS

7010 INTELLIGENCE/INVESTIGATIONS SECTION ORGANIZATION

The Intelligence/Investigations Section (I/I) is responsible for conducting investigations to determine cause(s) of an incident and provide Command intelligence information that could influence the response activities of an incident. This Section can include an Investigative Operations Group, Intelligence Group, Forensic Group and Investigative Support Group. The IC/UC will determine the need for a I/I Section and designate a qualified individual to fill the role of I/I Section Chief (ISC).

Additional information regarding this position can be found in Chapter 9 of the USCG IMH.

7020 INTELLIGENCE/INVESTIGATIONS SECTION IMPLEMENTATION

Activation and implementation of the I/I Section as described in reference (a) is generally driven by three activities.

- Marine Casualty Investigation
- Intelligence driven preventive PWCS operations
- Criminal Investigation

This activity driven application the I/I Section is needed due to the different levels of sub-specialties and integration of the I/I Section into the full IMT during these two similar concepts.

The type of investigation dictates the level of integration allowed between the I/I Section and the full IMT. Guidance for all three activities is outlined below.

The first activity, and most typical in the Coast Guard, is the activation of an I/I Section during a marine casualty investigation.

The second activity is the activation of an I/I Section for enhanced preventive operations conducted based on intelligence, but without an actual incident occurring. An example would be a port security level increase to MARSEC 2 based on intelligence.

The third activity is the activation of an I/I Section during a criminal investigation.

7100 INTELLIGENCE/INVESTIGATIONS SECTION CHIEF

The ISC, a member of the General Staff, is responsible for the management of intelligence and investigation activities. The ISC is normally selected from the organization with the most jurisdictional or functional responsibility for the intelligence or investigation activities.

The responsibility of the ISC is to provide Command intelligence information that could have a direct impact on the safety of response personnel and influence the disposition of maritime security assets involved in the incident response.

The ISC activates and supervises ICS organization elements in accordance with the IAP and directs IAP implementation. The ISC also directs the preparation of intelligence and investigation plans, requests and releases resources, monitors operational progress, makes expedient changes to the IAP when necessary, and reports those changes to the IC/UC.

Actual responsibilities of the ISC will be incident/situation dependent. The use of Deputies is highly encouraged based upon workload and specialty knowledge needs. The major responsibilities of the ISC are:

Generic responsibilities of the ISC:

- Evaluate and request sufficient supervisory staff for both operational and planning activities.
- Supervise I/I Section personnel in executing work assignments while following approved safety practices.
- Evaluate I/I operations and make adjustments to the organization, strategies, tactics, and resources as necessary.

- Advise RESL of changes in the status of resources assigned to the I/I Section •
  Monitor the need for and request additional resources to support I/I operations.
- Identify and use staging areas.
- Identify kind, type, and number of resources required to support selected strategies.
- Determine the need for any specialized resources.
- Work with the PSC and OSC to develop I/I aspects and components of the IAP, including incident objectives, strategies, tactics, and priorities; information on resources, reserves, services and support.
- Review and approve final I/I Section related ICS 204-CG prior to IAP approval.
- Coordinate planned activities with the SOFR to ensure compliance with safety practices.
- Ensure that activities related to the formulation, documentation, and dissemination of the IAP and other planning activities do not jeopardize the investigation, intelligence sources, violate operations security or information security procedures, measures, or activities.
- Assist with development of long-range strategic contingency and demobilization plans.
- Develop list of I/I Section resources to be demobilized and initiate recommendation for release.
- Receive and implement applicable portions of the incident Demobilization Plan.
- Participate in meetings and briefings as required.
- Coordinate with the PIO to develop I/I related public information for release.
- Coordinate with the PIO to ensure that public information-related activities do not violate or contradict operations security or information security procedures.
- Conduct debriefing session with the IC/UC prior to demobilization.
- Maintain Unit Log (ICS 214-CG) and forward to DOCL for disposition.

Investigation related responsibilities of the ISC:

- Supervise the marine casualty investigation.
- Support the development of investigation related CIRs.
- In coordination with the OSC, develop and implement procedures to prevent interference with investigations activities.
- Manage evidence collection, chain of custody, and disposition.
- Frequently communicate and coordinate with the OSC regarding tactical intelligence/investigations-related activities (e.g., execution of a warrant, arrests, physical surveillance, electronic surveillance, etc.), and involve the respective legal authorities
  (e.g., prosecutors' office, magistrates, and courts of jurisdiction) as required.

- Provide investigation briefings to the appropriate agencies as requested.

Intelligence related responsibilities of the ISC:

- Provide intelligence briefings to the IC/UC as requested.
- Establish liaison with and incorporate LE and intelligence agencies including the CGIS, Federal Bureau of Investigation (FBI)/Joint Terrorism Task Force (JTTF), and state and local police departments as appropriate.
- Support the development of intelligence related CIRs.
- Provide intelligence briefings in support of the Operational Planning Cycle.
- Collect and analyze incoming intelligence information from all sources for applicability, significance and reliability.
- Provide the SITL with periodic updates of intelligence and investigation situation status as allowed by operations security or information security requirements.
- Review the IAP for intelligence and investigation implications.
- Conduct first order analysis on all incoming intelligence and fuse all applicable incoming intelligence with current intelligence holdings in preparation for briefings.
- In coordination with the DOCL, establish and maintain systematic, cross- referenced intelligence records and files.
- Prepare all required intelligence reports and plans.
- Evaluate the current situation, and estimate the potential future situation.
- Support the SITL in the development of an accurate common operating picture to maximize situational awareness.
- Support the COML in development and implementation of an incident-specific Communications Plan, particularly if secure communications systems or security protocols are appropriate.
- Request a sufficient number of communications devices, including secure communications devices (e.g., secure telephone equipment, mobile Sensitive Compartmented Information Facility and secure video teleconference system)
- Implement audio, data, image, and text communications procedures, measures, and activities throughout the command structure to facilitate the sharing of classified information, sensitive compartmented information, and sensitive information.

Additional information regarding this position can be found in Chapter 9 of the USCG IMH.

7200 INVESTIGATIVE OPERATIONS GROUP SUPERVISOR (IOGS)

The Investigative Operations Group manages and directs the overall investigative effort for the ISC. The IOGS is the primary case investigator.

The major responsibilities of the IOGS can be found in Chapter 9 of the USCG IMH.

7300 INTELLIGENCE GROUP SUPERVISOR (IGS)

The Intelligence Group is responsible for three major functions: (1) information intake and assessment; (2) operations security, operational security, and information security; and (3) information/intelligence management.

The SITL is the primary node for overall information management - both unclassified and classified information. The IGS is responsible for providing incident awareness and assessment in support of and in coordination with the SITL.

The IGS can provide data and information from a wide variety of sources (e.g. government and commercial satellites, government and non-government aircraft, various ground and ship-based platforms, and people from various organizations).

As an incident rises in complexity or involves a more substantial amount of sensitive information and information management methodologies there may be a need to establish an IGS. The IGS is established within the I/I Section to facilitate accurate and efficient information flow with the SITL and other planning units. A formal Information Management Plan should be developed when the IGS is staffed due to the complexity of the incident and information requirements.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

7400 FORENSIC GROUP SUPERVISOR

The Forensic Group is responsible for managing crime scenes and processing forensic evidence, digital and multimedia evidence, and decedents. The Forensic Group ensures proper examinations, analyses, comparisons, and enhancements of forensic evidence, digital and multimedia evidence and decedents by the appropriate laboratories, analytical service providers, and morgues. The Forensic Group coordinates with the Mass Fatality Management Group and the medical examiner/coroner on matters related to the examination, recovery, and movement of decedents.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

7500 INVESTIGATIVE SUPPORT GROUP SUPERVISOR

The Investigative Support Group works closely with the Command and General Staffs, particularly the Logistics Section and Planning Section, to ensure that necessary resources, services, and support are obtained for the I/I Section.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

8000 MARINE FIRE FIGHTING

[Link to Marine Firefighting Plan Annex]

8010 AUTHORITY

- The Federal Fire Prevention and Control Act of 1974 states that fire fighting is and should remain a state and local function.
- The USCG, under the provisions of the Port and Waterways Safety Act, has broad authority to prevent damage to, or the destruction/loss of, any vessel, bridge or other structure on or in the navigable waters of the United States. This statute, along with the provisions of 14 U.S.C. 88(b) (render aid and save property), provides authority for such assistance against fires as the USCG may afford with its available resources.

8020 POLICY

- Although the USCG has an interest in fires involving vessels or waterfront facilities, local authorities are principally responsible for maintaining the fire fighting capability in U.S. ports.
- The COTP will constantly monitor all activities during the course of a marine fire or disaster. If the COTP is not satisfied with the direction or progress, then he/she may order actions that in his/her best judgment will bring the matter to a successful resolution and safeguard the port and the environment.

8030 LOCAL POLICY

- The fire department within whose jurisdiction a burning vessel is located is the responsible fire fighting agency and assumes the responsibilities of incident command in all firefighting efforts.
- A COTP representative joins the IC, the vessel master and the state emergency management representative in a UC.

8040 RESTRICTION

- USCG units may monitor response actions and provide assistance as available. USCG support may include supplying water and logistics to fire fighting forces, cooling exterior bulkheads/walls with hose lines or monitors or enforcing safety or security zones at the scene.
- Generally, USCG personnel shall not directly engage in fire fighting activities except when necessary to save a life or when possible to avert a significant threat with minimal risk to USCG personnel.

8100 ROLE OF CAPTAIN OF THE PORT

- The COTP shall not assume overall control of fire fighting efforts when appropriate qualified fire officers are present and able to take control.
- The COTP will be an agent that works as a coordinator, in the UC Structure, with the fire IC.

8200 MARINE FIRE RESPONSE OBJECTIVES

Operational Objectives:

- Ensure the safety of responders
- Establish a safety zone
- Recover and transport casualties
- Deploy Search and Rescue assets
- Contain and extinguish the fire
- Deploy marine pollution response assets
- Deploy air assets to aid in SAR and enforcement of safety zone
- Develop and approve a salvage plan
- Monitor vessel stability
- Ensure salvage of the vessel and its cargo are conducted safely

8210 RESPONSE ACTIVITIES

Implement the ICS. All operations and response activities must be managed the ICS.

8220 BURNING VESSEL CONSIDERATIONS

Prior to granting a burning vessel permission to enter or move within the port, the COTP should consider consulting with members of the local response community which would include at a minimum:

- Chiefs of the Fire Departments involved
- Key Technical Advisors
- Local government officials (e.g., Director of Emergency Services)
- Pilots Association
- Master of the vessel
- Port Directors

- Vessel owner's agent

Certain information must be obtained in order to aid in determining how and to what extent the vessel fire will affect the overall operation of the port, the local communities, and the environment. Such information would include:

- Location and extent of the fire
- Potential for the fire to spread to the pier or pier structures, other vessels, and high value assets
- Status of shipboard firefighting equipment and pier access
- Fire fighting resources available or at the location
- Fire Department jurisdictional changes caused by moving the vessel
- Class and nature of the cargo
- Possibility of explosion/hazardous conditions aboard
- Possibility of release of hazardous materials or discharge of oil
- Possibility of vessel sinking or capsizing
- Vessel condition
- Maneuverability of the vessel
- Hazard to the crew or other resources where the vessel is presently located
- Effect on bridges and power lines under which the vessel must transit
- Present and forecasted weather
- Alternatives if the vessel is not allowed to enter or move

8230 FIRE FIGHTING PIER/ANCHORAGE SELECTION

Prior to selecting a fire-fighting pier, certain considerations should be taken into account:

- The pier must be of non-combustible construction.
- The location of the pier/anchorage must not place adjacent areas or vessels in danger given prevailing winds, weather, and other climatic conditions.
- The area should be large enough to stage equipment and brief fire fighters.
- Public access should be easily controlled.
- The depth of the water should be sufficient enough at low tide as to allow for the navigation of small craft such as tugs, barges but should not be so deep so as to cover the vessel's main deck in the event of sinking.
- The bottom contour should be level and of a sandy composition. • If an anchorage is chosen, the location should not constitute a hazard to navigation.

8240 FUNDING

Funding for USCG fire fighting activities must come from USCG operating funds. Funds from the OSTLF are limited to those situations where the fire is fought specifically to abate the potential for, or fire resulting from, a pollution incident. The owner/operator of the vessel or facility will be held responsible for firefighting costs.

The vessel's Protection and Indemnity representative:

- Is key to the vessel owner's funding of fire fighting operations
- Should be identified as soon as possible in the event of a fire
- Is notified by the master

The ultimate liability of the P&I Club for any claim or cost is determined only by and between, the vessel owner and the Club. Unless the Club, via the specific agreement of its authorized representative, commits to expenditure or obligates itself for a claim, the claimant's sole resort is to the vessel and its owner.

At times there may be problems with payment or reimbursement from vessel owners/operators. Such problems may include:

- The owner or master may not be immediately available, or may be difficult identify and/or locate.
- Holding owners/operators accountable for payment, especially if they declare bankruptcy.
- Collecting full costs from owner/operator or insurance company. • Insurance companies second-guessing decisions.

8250 Legal Issues

The management level of both government and industry must discuss potential problems with legal counsel.

9000 ANNEXES

9100 EMERGENCY NOTIFICATION

The assessment checklist for oil and hazardous substance releases are located in the GRP at the end of the Logistics sections.

9200 HAZARDOUS SUBSTANCE ANNEX

Introduction

[Link to the Oil and Hazardous Materials ESF #10 in the NRF] [Link to 9762 – Hazmat Incident Response Form]

In accordance with the National Response Plan and the Comprehensive Environmental Response, CERCLA the USCG will serve as the FOSC for actual or potential releases of hazardous substances within the coastal zone that would:

- Impact public health and safety; and
- Enter the environment and originate from;
  - Vessels or facilities

Purpose

This Annex is written to provide initial response guidance upon notification of a hazardous substance release in the coastal zone which may have actual, potential, or perceived consequences to public health or the environment.

If the hazardous substance release is suspected or confirmed to be the result of a terrorist act, response to the incident should be initiated using this Annex, the Terrorism Incident Annex and the Area Maritime Security Plan (AMSP).

Jurisdiction

The USCG is the FOSC for any hazardous substance releases in the coastal zone that require emergency removal actions with the exception of incidents that:

- Occur from vessels or facilities owned, operated, or controlled by the USDOD or USDOE.
- Are *non-emergency* removal actions of hazardous substance releases from vessels or facilities owned, operated, or controlled by Federal agencies *other than* the USDOD or USDOE.

Under the CERCLA the USCG IC (acting under their FOSC authority) has the authority to:

- Initiate a time critical assessment of the threat.
- Take the necessary steps to stabilize or control the immediately identified potential threat.
- Begin activating Federal scientific support agencies necessary to conduct an assessment (air, water, soil, or specific substance sampling in accordance with the relevant published sampling protocols and guidelines).
- Initiate a response.

Coast Guard Incident Commander Considerations

In most hazardous substance cases the On-scene IC will be from the local fire department or other local, county, or state agency. The USCG IC's role is to:

- Determine if the incident requires the initiation of the CIC procedures [Link to Critical Incident Communications Procedures Section]
- Determine if the response is being managed by appropriate local authorities in a timely manner (fire departments are normally lead agencies) and assess their need for Federal assistance.

If the response is being managed properly, provide Federal support as necessary to the on-scene IC through:

- Opening the CERCLA fund.
- Activating Basic Ordering Agreements with contractors.
- Providing technical support.
- Deploying Coast Guard resources as needed (AST, vessels or aircraft).

If the response is not being managed properly by the RP or is not managed in a timely manner, an Administrative Order may be issues under CERCLA for "hazardous substance" releases when the FOSC has determined that there may be an imminent and substantial endangerment to the public health and welfare or the environment.

The FOSC must be reasonably certain that the party to whom the Administrative Order is issued is in fact the responsible party .[Link to 9763 Example CERCLA Admin order]

A COTP Order can be issued to insure the safety of vessels and waterfront facilities, and the protection of the navigable waters and the resources therein, in the event that the RP:

- Cannot be identified, located, or contacted in a timely manner; or
- Is either unwilling or unable to take responsibility and initiate removal actions; or
- Is conducting removal actions which are inadequate, unsafe, and/or pose a hazard to public health and/or the environment; or
- Other agencies have not responded or are not available.

The COTP will determine whether to federalize the removal actions. If federalized, the following actions should be taken:

- Engage in a coordinated and prompt response (The general rule for CERCLA is "First make it safe, then determine the extent of the hazard and Federal removal authorities")
- Contact the appropriate state agency
  - New York State Emergency Management Office
  - Pennsylvania Emergency Management Agency

- Ohio State Emergency Management

- Contact local/state authorities to secure the scene and establish exclusion zones
- Access CERCLA funding
- Consult the Base Plan Section 2000 for further Incident Commander actions [Link to Initial Considerations and Decisions of the IC/UC]
- Conduct a removal site assessment to include:
  - Identification of the source
  - Determination of the threat to public health (resources that can assist with this determination include)
    - Agency for Toxic Substance Disease Registry (ATSDR)
    - Local, County or State public health officials
  - Evaluation of the magnitude of the threat
  - Determination if actions have been taken to mitigate the release
  - Determination if there is potential of further release
- Designate the PRP(s)
- Determine when removal actions are complete

If the site requires continued cleanup under the remediation phase, and is not a vessel, transfer the role of OSC to EPA Region II, III, or V as appropriate.

Circumstances where the Coast Guard can Transfer OSC to the EPA

[Link to Guidance for Transitioning OSC from the CG to the EPA Section 9760]

The most common circumstances under which the USCG OSC would transfer OSC responsibilities to the EPA for action are when:

- The release originates from a Hazardous Waste Management Facility. • The release does not require an immediate removal action
- The site assessment determines that:
  - The release does not require immediate removal actions
  - Remedial actions are necessary to complete the cleanup
  - The threat of further release has been eliminated, prior to the completion of the cleanup.
- USCG policy requires that removal be secured when prompt action is no longer necessary and substantial remediation methods must be used to completely remove the remaining contamination.

When requesting a transfer of the OSC authority a "Statement of Agreement Transferring FOSC Responsibility" shall document the transfer of authority. [Link to sample Statement Section 9761]

Under normal circumstances, the USCG will not transfer OSC authority to the EPA whenever the source of a release is a vessel.

Notification

If the USCG is receiving the initial notification:

- The information will be recorded in Sector Buffalo's Hazmat Incident Response Form [Link to Form Section 9762]
- Contact the NRC
- Contact appropriate local communications centers to activate local notification protocols

Dispatching Initial Coast Guard Response Personnel

Safety is always the primary consideration when the determination is made to dispatch response personnel. Prior to dispatching personnel ensure that the following are completed:

- Obtain information on the hazardous substance (consider the following potential sources of information)
  - RP
  - Reference material sources (list not inclusive)
    - CHRIS Manuals COMDINST 16465.12
    - Material Safety Data Sheet (MSDS)
    - Supplied by PRP
    - Websites http://msds.ehs.cornell.edu/msdssrch.asp
      http://physchem.ox.ac.uk/MSDS/ - MSDS
    - Department of Transportation' s Emergency Response Guidebook
    - NIOSH Pocket Guide [Link to Guide]
    - Atlantic Strike Team
    - Collect existing and forecast environmental conditions (wind direction, speed, precipitation, temperature, inversions, etc)
    - Determine nature of safety risk to responders consistent with environmental conditions. For example:
  - Inhalation hazards are directly related to wind conditions & inversions
  - Some chemicals, such as concentrated acids, react violently with water

- Vapor pressure and off-gassing increase with temperature

- Determine, if established, the location of the ICP
  - If there is no ICP established, contact appropriate local authorities to isolate the hazard and establish a safely located ICP
  - If locals are unable to isolate and/or control the hazardous substance release contact the Atlantic Strike Team to make entry and determine the exclusion, contamination reduction zone, and safe zone
- Get directions to the ICP that provide a safe approach to prevent inadvertent entry into a contaminated area – and check the approach against your own assessment of wind direction/speed.
- Conduct an operational risk assessment to evaluate safety concerns using either:
  - Green/Amber/Red (GAR) Model [Link to GAR form Section 9707]
  - Operational Hazard Work Sheet
  - [Link to ICS Compatible Site Safety Plan Section 9708]
  - [Link to Specific Hazard Attachments Section 9709]
- Ensure appropriate protective equipment is available
  - Emergency Escape Breathing Apparatus
  - Appropriate respirator and cartridge
  - Toxi-clip
  - Oxygen meter

Actions upon Arriving On-Scene

- Meet with the on-scene IC at the ICP
- Determine the extent of the emergency (hazards) and actions taken to mitigate
- Determine with IC any need for Federal assistance
- Meet with PRP representative on scene and determine willingness to conduct removal actions on behalf of FOSC
- Obtain and record the following information on the unit's Hazmat Incident Response Form
  - Information on site security and control
  - Availability of Emergency Response Plan
  - Availability of Site Safety Plan
  - Available and/or on scene Hazardous Materials response teams
  - Appropriate use of personal protective equipment
  - Air monitoring procedures
  - Cleanup and disposal procedures

For all Federalized Removal Actions (at a facility or on a vessel)

The UC should consider the following priorities, objectives and determinations when responding to a hazardous substance release.

Unified Command Priorities

- Responder safety
- Rescue of victims of the incident
- Source Control/Incident Stabilization
- Public safety and hazard mitigation
  - Protection from direct exposure, possible evacuations (evacuation determinations are generally a local government decision)
  - Protection of water intakes [Link to Water Intakes Notification List]
  - Protection of underground drinking water aquifers
  - Consider neutralizing agents prior to cleanup
- Removal, decontamination and treatment of injured or potentially exposed personnel
- Environmental cleanup/restoration
- Proper transportation, storage and disposal of contaminated debris & waste

Unified Command Considerations for an Incident Involving a Vessel

- Determine need to triage, treat, transport, decontaminate, and/or evacuate passengers and non-essential crew
- Establish a safety zone
- Vessel stability (refer to section 3300 in ACP)
- If vessel is underway, consult with states to determine whether to bring the vessel into port
- Determine if Safe to Respond [Link to Safe to Respond 9712]
- If vessel is on fire, consult the Marine Fire Fighting and SAR Plan [Link to Marine Fire Fighting Plan]

Unified Command Organization

The information in Figure 1 represents agencies that may support a hazardous substance release response operation and where they may potentially work in a UC organization.
If there is a suspected or actual terrorist threat associated with the incident, then this information should be used in conjunction with the UC organization structure outlined in the Terrorism Incident Annex.

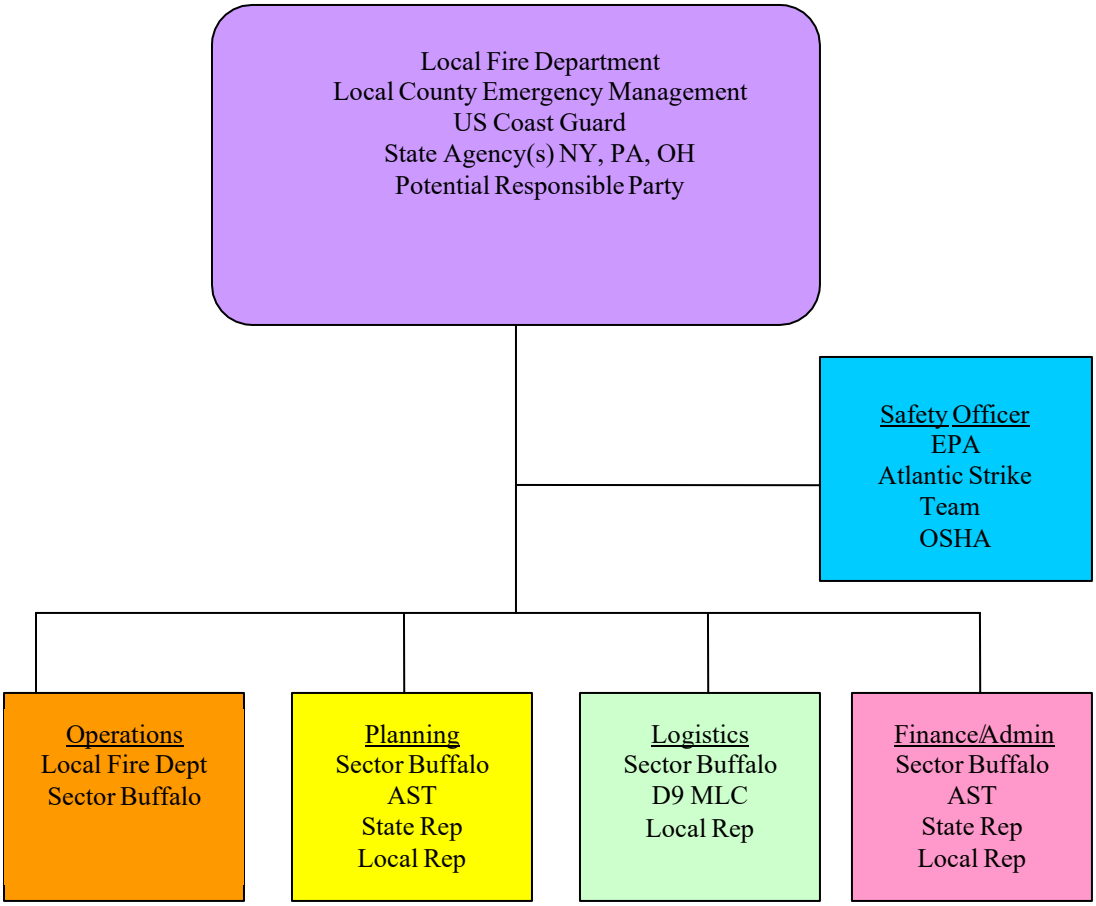

Figure 1 depicts the potential agencies that may respond to a major hazardous substance release incident in the coastal zone.

Special Teams [Link to Special Teams Handbook]

The following special teams are equipped to respond to hazardous substance incidents, and should be considered as potential response resources:

- EPA Environmental Response Team (ERT)
- AST
- OSHA
- NOAA

9300 BIOLOGICAL INCIDENT ANNEX

Introduction

[Link to the Biological Incident Annex in the NRP]

Response to a biological incident in the coastal zone can range from the illegal disposal of medical waste to the intentional release of a disease-causing organism. Initial response actions to a biological incident will depend on the type of incident and the cause or suspected cause of the incident (i.e. terrorist act).

The USCG IC's response to biological incidents most likely will involve the use of both the COTP and FOSC authorities. The FOSC role is limited to disease causing agents that exist outside a host for a period of time and which can be physically removed from the environment.

Purpose

The purpose of this Annex is to provide initial response guidance upon notification of a suspected or actual report of a biological incident in the coastal zone.

If the biological incident is suspected or confirmed to be the result of a terrorist act, response to the incident should be initiated using this Annex, the Terrorism Incident Annex, and the Area Maritime Security Plan.

Using this Annex

The guidance in this Annex includes initial actions to be taken when responding to:

- Illegally dumped medical waste
- Quarantine (suspected or confirmed infectious disease on a vessel)
- Suspect or confirmed release of a biological agent involving:
  - Tainted, contaminated or otherwise suspect cargoes
  - Passengers and crew of a vessel
  - Buildings in the coastal zone

Illegally dumped medical waste

Determine if competent authorities are taking appropriate action to remove the hazard (State and/or local health agencies are normally the lead agencies)

If yes:

- Provide support as capabilities, authorities and safety of Coast Guard personnel allows

If no:

- Contact local law enforcement and secure the area
- Ensure that local health officials are aware of the incident

- Determine if the medical waste presents an imminent and substantial danger to public health
- Initiate cleanup operations under CERCLA
- Hire a contractor authorized to handle medical waste to remove the Hazard (cleanup contractors that can respond to a biological incident).

Quarantine (suspected or confirmed infectious disease on a vessel)

The intent of quarantine is to isolate the vessel involved, prevent those infected from going ashore without proper precautions, and to limit exposure to shore side personnel.

Upon notification that a vessel may have a possible or actual communicable disease onboard or is flying the quarantine flag the following actions should be taken:

- Immediately establish communications with the vessel to determine
  - Why the vessel is flying the quarantine flag
  - What disease is onboard
- Determine if the vessel has adequate crew to safely navigate the vessel
- Do not permit any Coast Guard personnel to board the vessel without approved safety precautions
- Immediately notify federal, state and local health departments
  - U.S. Public Health Department
  - Pennsylvania Department of Health
  - New York Department of Public Health
  - Ohio Department of Health
- Gather medical information on affected crewmembers and passengers [Link to Medical Form Section 9750]
- Obtain a crew list
- Establish vessel security to control access (on and off the vessel)
- Maintain log of personnel that come on and off the vessel
- Ensure that Pilot's Association is notified
- Issue COTP order to:
  - Implement a security plan
  - Prohibit cargo operations
  - Prohibit discharge of 'grey' water
- Notify unit's Public Health Doctor to advise the Command and provide liaison with local health officials
- Direct agent to get medical assistance for crew

- As directed by public health incident commander implement port quarantine plan [Link to Quarantine Policy Section 9754]
- Notification to the NRC will result in the NRC Notifying the Center for Disease Control requesting assistance from ATSDR
- Notify Customs and Border Protection

Suspected or confirmed release of a biological agent

The actions that the USCG IC takes in response to a suspected or confirmed release of a biological agent will be driven by many factors:

- Is the incident on a vessel? If yes,
  - Have the crew and/or passengers been impacted?
  - Is it the vessel's cargo?
- Is the incident at a facility or building in the coastal zone?
- Is the intelligence credible?

For any suspected or confirmed biological incidents involving vessels

- Consult with appropriate agencies to determine details for issuing a COTP Order directing the vessel to remain offshore or go to a safe anchorage
- Work with the Sector Intelligence staff to determine if threat is credible or non-credible
  - If credible, support the USDHHS which is the Coordinating Agency and the FBI [Refer to Terrorism Incident Annex]
- Initiate CIC procedures [Link to Critical Incident Communications Procedures]
- Determine if Safe to Respond
  - Work with the UC to determine the control zones (hot, warm, cold)
  - Ensure UC communicates location of zones to response personnel
  - Document Safe to Respond determination
- Support designated public health officials to minimize the health risk of passengers and crew, by:
  - Isolation of contaminated areas
  - Gross decontamination for exposed personnel (showers)
  - Minimize spread by securing contaminated articles (bag suspected clothing)
- Ensure all crew, pilot and passengers are accounted for and maintain positive control
- Determine if a safety zone will be required (waterside and landside)
- Determine any actions required for the safety of the crew and any passengers

- Contact CGD Nine Command Center for determination if a Statement of No Objection (SNO) is required for law enforcement boarding
- If necessary, request a Crisis Exemption from the EPA for the use of any chemical countermeasures that use products regulated by the Federal Insecticide, Fungicide, and Rodenticide
- Act (FIFRA) of 1996
- Crisis communications
  - Medical professionals should communicate with the public
  - Public health are the primary spokespersons for biological incidents
- Determine need to obtain CERCLA funding

If suspected source for the biological agent is cargo

The UC should consider the following priorities, objectives and determinations when responding to a suspected biological agent that involve a vessel's cargo.

Unified Command Priorities

- Safety of boarding teams
- Public safety
- Selecting a location to offload suspected cargo/passengers
- Disposal of the cargo

Unified Command Objectives

- Conduct security boarding
  - Boarding team to examine ship's medical log to determine if any entries were made regarding crew's possible exposure to a biological agent
- Check for secondary devices (explosives)
- Conduct non-intrusive assessment of suspect cargo testing for:
  - Flammable
  - Radiological
  - Chemical
  - Biological
  - Explosives
- Ensure the preservation of evidence

Unified Command Determinations

- Determine the location where suspected cargo should be offloaded
  - At anchorage
  - Pier side
- Determine need to establish a Science Team
- Determine where to dispose of the cargo
  - At sea
  - On land – may require State permit for disposal, a problem may occur when crossing state boundaries

Unified Command Organization

The cooperation of many organizations will be required to successfully respond to and mitigate the threat posed by a biological incident. The information in Figure 1represents agencies that may support a biological response operation and where they may potentially operate in a UC organization. This information should be used in conjunction with the UC organization structure outlined in the Terrorism Incident Annex.

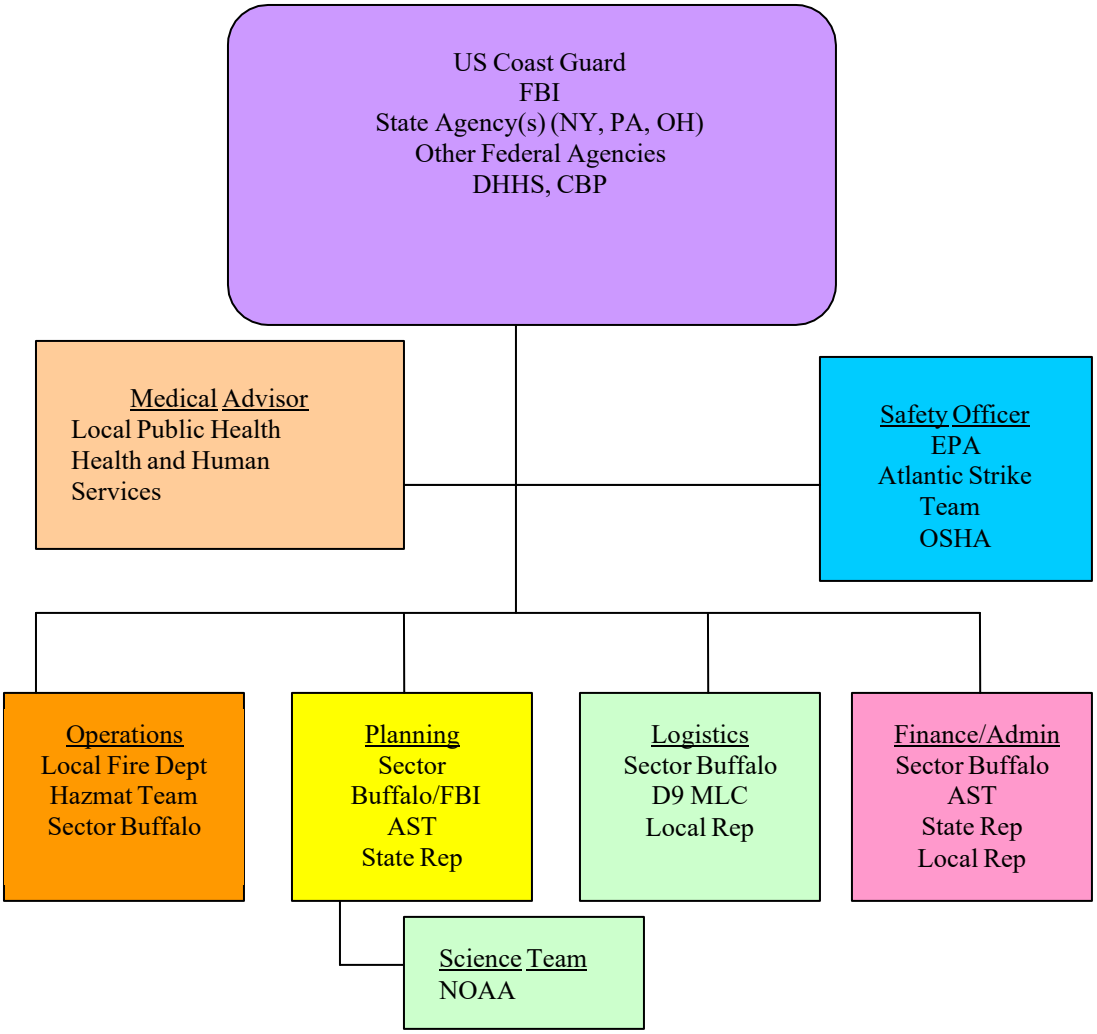

Figure 1 depicts the potential agencies that may respond to a biological incident in the coastal zone. The information in this Figure should be used in conjunction with the ICS organization structure in the Terrorism Incident Annex.

Science Team

The Science Team is led by NOAA's SSC and is responsible for:

- Determining appropriate entry procedures for inspecting the interiors of suspected containers of container cargo
- Developing a sampling plan
- Developing disposal protocols for unknown biological hazards
- Developing plan to transport and dispose of contamination

The Science Team may have representation from a wide variety of agencies and entities including but not limited to:

- Center for Disease Control and Prevention
- USDA
- AST
- USEPA Region II , III, and V
- Request for USEPA assistance made through their Regional Response Center 24- hour number
- Food and Drug Administration
- State Health Agencies
  - New York
  - Ohio
  - Pennsylvania
- Animal Plant and Health Inspection Service
- State Departments of Environmental Protection
  - New York State DEC
  - Ohio DEP
  - Pennsylvania DEP

A Building Structure in the Coastal Zone

Local and state health agencies have primary jurisdiction in responding to biological incidents. The USCG IC will ensure that:

- Competent authorities are responding
- Notifications are made to the appropriate authorities:
  - USEPA Region II, III, or V
  - FBI

- Buffalo Office
- Syracuse Office
- Pittsburgh Office
- Cleveland Office
- The incident site is secured
- A site assessment is conducted
- Sampling and analysis plan
- Once situation is stable the USCG IC will begin transferring the role of FOSC to the appropriate USEPA region

[Link to Guidance for Transitioning OSC from the CG to the EPA Section 9760]

9400 Radiological Incident Annex

[Link to the NRP Nuclear/Radiological Incident Annex]

Introduction

The USCG's jurisdiction as the Coordinating Agency for a radiological incident is limited in both geographic area and authority.

Figure 1, illustrates the two most important criteria (jurisdiction and terrorism) that determine the USCG's role as either a Coordinating Agency or as a cooperating agency during a radiological incident.

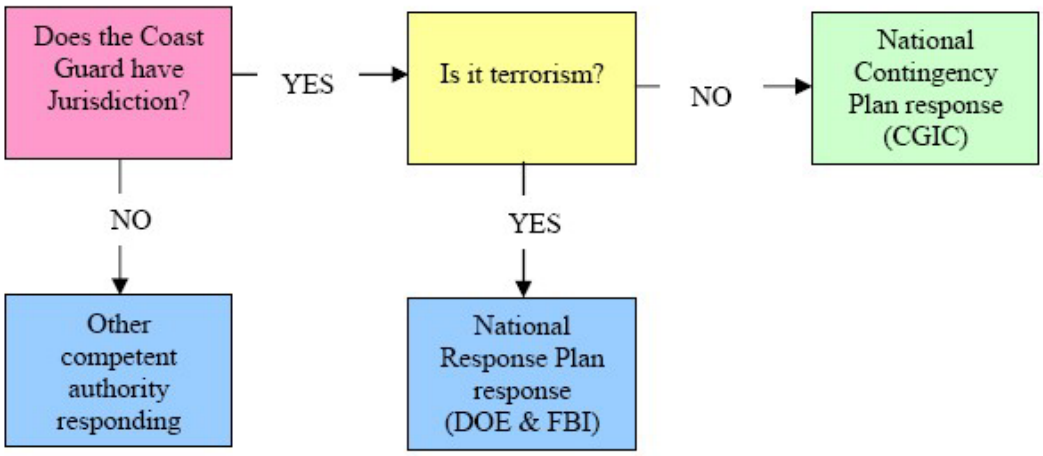

Figure 1. In radiological incidents where the USCG has jurisdiction and there is no involvement of terrorism the USCG IC responds under the NCP. For any radiological incidents where terrorism is involved, the USDOE is the Coordinating Agency responding under the NRP and the USCG is a cooperating agency.

Purpose

The purpose of this Annex is to provide guidance to the USCG IC and their Maritime Security and AC partners in responding to radiological incidents that have actual, potential, or perceived radiological consequences.

A radiological incident involves the release or potential release of radioactive material that poses an actual or perceived hazard to public safety, national security and or the environment. The role of the Coordinating Agency for radiological incidents in the maritime environment can reside with several different federal agencies depending on geographic location, accountability for the radiological source, and the suspected or actual involvement of terrorism.

Coast Guard Jurisdiction

[Link to Flow Chart 9780]

The NRP limits the USCG's Coordinating Agency role for radiological incidents to "certain areas of the coastal zone" which is defined as radiological incidents that occur on:

- Any type of vessel,
- Waters seaward of the shoreline to the outer edge of the EEZ, and
- Specified waterfront facilities

For the COTP Sector Buffalo these specified facilities are listed in the following link: [Waterfront facilities]

The type of incidents the USCG IC will respond to are:

- Transportation of radioactive materials
  - Shipment of materials that are not licensed or owned by a Federal agency or Agreement State
- Foreign, unknown or unlicensed material
  - Incidents involving foreign or unknown sources of radioactive material or radioactive material which does not have appropriate licenses
- Space vehicles containing radioactive materials
  - Not managed by USDOD or NASA (i.e. commercial satellite)

In addition to geographic limitations, the scope of the USCG's jurisdiction as the Coordinating Agency is limited to those radiological incidents that do not involve a terrorist act.

For any terrorist event involving non-Department of Defense or non-Nuclear Regulatory Commission (NRC) radioactive material, the Department of Energy (DOE) will assume the role of Coordinating Agency to address the radiological aspects of the response

Using this Annex

Notification of a possible or actual radiological incident can occur in several ways. To facilitate initial actions to be taken and to determine jurisdiction choose the link that matches your method of notification.

- Passive detection from radiation pagers (Level I)
- Intelligence source(s)
- Notification of a radiological release - NCP response

- Actual terrorist incident involving radiation

Passive Detection (Level I)

A radiological incident may be first discovered while conducting routine operations in the port (discovery may be made by USCBP) or through intelligence gathering. The guidance in the Unit's Radiological Response SOP will be used when Level I detection indicates the presence of a radiological source. Depending on the method of discovery and whether the incident is on a vessel or facility, the USCG IC should make some initial determinations as to which course of action to take:

- **On a Vessel:** While on board a vessel (underway or moored), if a Level I Team detects either neutron or gamma radiation and has determined that the source is illegitimate or unknown, the USCG IC, in consultation with the States, should determine the safest location for the vessel to be located. Safe location options are to:
  - If at sea, keep the vessel at sea
  - If vessel is transiting in the port or is moored, direct the vessel to a safe location. Options include: if moored remain at moorings, anchorage, or send out to sea. Take into account the following:
    - Proximity to population centers
    - Critical infrastructure
    - Vessel traffic in the vicinity of suspect vessel
    - Ability to get teams on and off the vessel
    - Source is emitting neutrons (may indicate the presence of spent nuclear material)
  - Consult Port of Safe Refuge Document [Link to Port of Safe Refuge]
- **On a Facility:** If a Level I Team detects either neutron or gamma radiation and has determined that the source is illegitimate or unknown while at a facility:
  - Determine whether to limit facility operations adjacent to the isolation perimeter established by the Level I Team
  - If source is emitting neutrons may indicate the presence of spent nuclear material (Note: Neutron sources rarely occur naturally and are usually produced in a reactor. Although they are generally associated with special nuclear material, there are some legitimate sources of neutron radiation).
  - In conjunction with the Facility Security Officer evaluate the need to limit access into the facility or evacuate the facility

For both vessels and facilities:

If radiation source is illegitimate, unknown or exceeds the safe exposure limits for a Level I Team, the Level I Team is to notify the chain of command requesting Level II support. Upon receiving the request, Commander Sector Buffalo should consider the following:

- Deploy Level II Team to localize and characterize the radiation source. Level II resources:
  - AST
  - Sector Buffalo
  - USCBP
- Notify Buffalo FIST
- Contact the CGIS Liaison Agent to the JTTF to notify the local FBI Office when Level II Team is deployed.
- If necessary, Level II Team to coordinate with USCBP Laboratory Scientific Support (LSS).
  - LSS radiological officer 24-hour number is: (407) 975-1780.
- Notify the State(s)
- Determine need to shift to secure communications
- Consider establishing Safety/Security Zones
- Determine Safe to Respond [Link to Safe to Respond Document]
- If Level II Team cannot identify the source as legitimate, request assistance from the USDOE Radiological Assistance Program (RAP) Team at the Brookhaven Area Office

- Emergency number (631) 344-2200
- Notify the NRC if RAP support requested

- Determine need to initiate CIC procedures [Refer to CIC Procedures Section 1050]

Intelligence Sources

When the USCG receives notification of possible intelligence regarding a potential radiological incident it is critical to determine if the intelligence is credible.

- Work with the Buffalo FIST and CGIS to determine if threat is credible.
  - If credible, support the USDOE, which is the Coordinating Agency, and the FBI. [Link to Terrorism Incident Annex] - If not credible,
- Does the USCG have jurisdiction? [Refer to Section 9780 Flow Chart]
- If yes, conduct follow-up to determine if there is public health threat

Actual terrorist incident involving radiation

In the event of an actual terrorist incident involving radiation the USCG's role is as a cooperating agency using primarily the authorities of the COTP. Initial actions to be taken:

- Initiate CIC procedures [Link to Critical Incident Communications Procedures]
- Account for all field deployed teams, individuals and assets

- If the USCG is the first federal agency on scene, implement the Terrorism Annex until relieved by the USDOE [Link to Terrorism Incident Annex]

Notification of a Radiological Release responded to under the National Contingency Plan

This section of the Annex discusses non-terrorist radiological incidents where the USCG has jurisdiction and where response operations are conducted under the NCP.

Unified Command Organization

The actual make-up of the UC in response to a radiological incident conducted under the NCP will depend on the incident location and complexity. Figure 2 lists potential agencies and entities that would most likely respond to a non-terrorist radiological incident in the COTP Sector Buffalo zone.

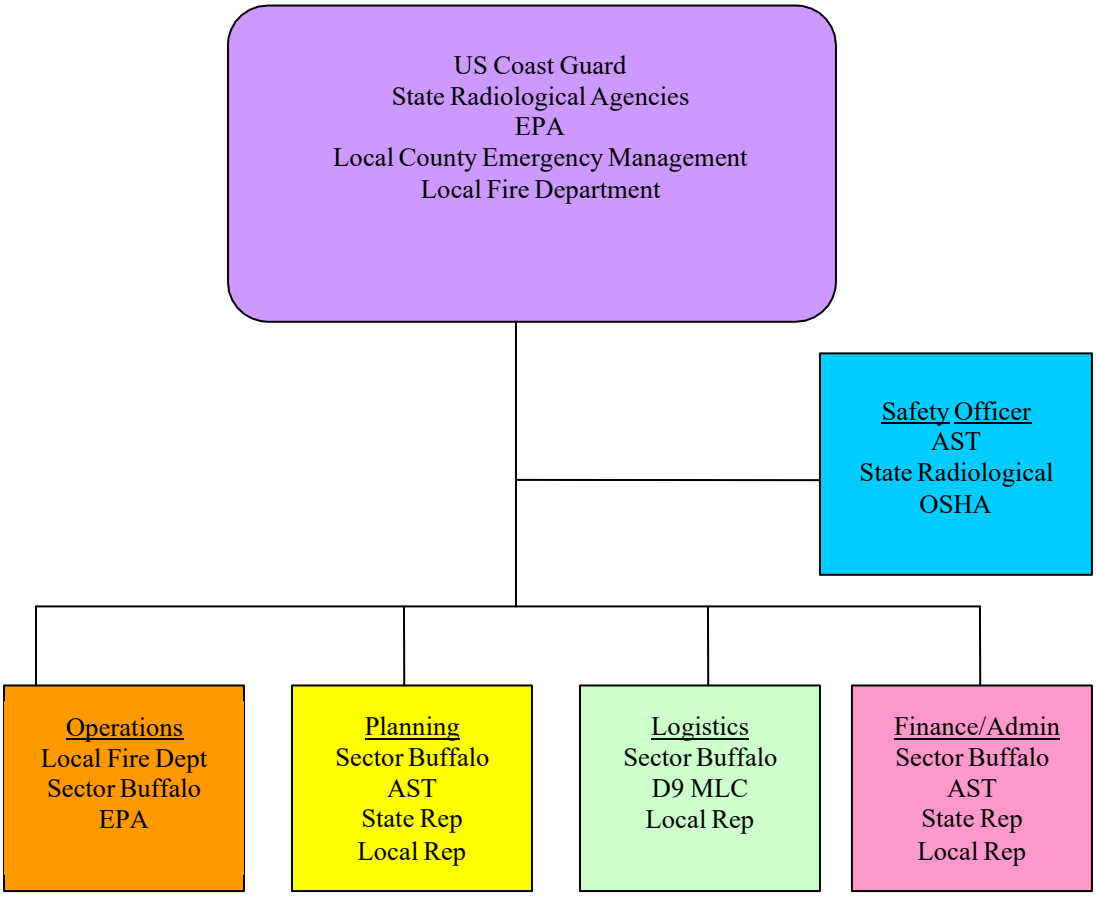

Figure 2. The actual makeup of the Unified Command organization in response to a radiological incident will depend on incident location and complexity. The agencies and entities listed in the ICS organization chart represent those most likely to respond to a radiological incident under the National Contingency Plan in Captain of the Port Sector Buffalo zone.

•

For the Operations Section Chief, consider:

- Complexity of the incident

  Knowledge and experience in responding to radiological incidents
- Agency with the greatest jurisdiction, involvement, and statutory authority

Incident Commander/Unified Command Response Objectives

IC's/UC should use this Annex in conjunction with the Base Plan [Refer to Incident Commander/Unified Command Section 2050] when responding to a radiological incident in certain areas of the coastal zone, to:

- Ensure the safety of responders through the use of radiation detection equipment and monitoring devices
- Establish incident site control zones (exclusion, contamination reduction zone, support zone) based on active surveillance:
- Determine the extent of the contamination
- Minimize the spread of contamination
- Isolate hazard from the public and non-responders
- Determine need to establish public health monitoring
- Stabilize the source
- Prevent the spread of radiological material from the incident site
- Implement effective communications with state EOC
- Coordinate incident security
- Access Comprehensive Environmental Response, CERCLA funding
- Ensure coordination of technical data (collection, analysis, storage, and dissemination)

Safety Officer

The two radiation concerns at an incident are exposure and contamination by radioactive material.

List of hospitals capable of accepting radiation causalities:

- New York [Link to the ICS-206, Medical Plan Section 9704]
- Ohio [Link to the ICS-206, Medical Plan Section 9705]
- Pennsylvania [Link to the ICS-206, Medical Plan Section 9706]

•

Safety officers shall ensure active surveillance of:

- Air monitoring
- Visual surroundings
- Ground truthing

Actions that can be taken to minimize exposure involve Time, Distance, and/or Shielding:

Decrease the amount of TIME spent in close proximity to the radiation source.

- Keep as much DISTANCE away from the source as feasible
  - As a rule of thumb, every time you double the distance away from a radiological source, you reduce the exposure rate by four times.
- Use available means of SHIELDING to lower the amount of exposure to the source.

Special Teams

The following special teams are equipped to respond to radiological incidents, and should be considered as potential response resources:

- EPA Radiological Emergency Response Team (RERT)
- USCG Atlantic Strike Team (AST)
- USDOE Radiological Assessment Program (RAP) Team
- USACE Rapid Response
- NOAA SSC

9410 GREAT LAKES SMALL VESSEL RADIOLOGICAL/NUCLEAR DETECTION REGIONAL ANNEX – This is a separate document FOUO

9500 AMS/TERRORISM ANNEX

[Refer to the Terrorism Law Enforcement and Investigation Annex in the NRP]

Introduction

In responding to a potential or actual terrorist incident in the maritime environment the USCG will respond with the FBI and other appropriate Federal, State and Local agencies to establish a UC.

The UC will simultaneously manage incident operations involving law enforcement response and response operations aimed at protecting public health and safety.

Purpose

The purpose of this Annex is to facilitate the effective integration of law enforcement and public health and safety response activities involving potential or actual terrorist incidents that occur in the maritime environment.

This Annex should be used in conjunction with one or more of the other annexes (oil, hazardous materials, radiological, biological) as appropriate.

The guidance in this Annex includes:

- USCG jurisdiction
- FBI jurisdiction
- UC Organization
- Determinations to be made by the USCG IC
- UC Priorities
- Initial UC objectives
- UC considerations
- Operations Section organization model
  - OPS
  - Deputy Operations for Maritime Security
  - Deputy Operations for Law Enforcement and Investigation
  - Deputy Operations for Response and Recovery
- Planning Section

    - Deputy PSC
- Coordination between the ICP and the Joint Operations Center (JOC)
- USCG Liaison to the JOC
- Special Teams
- Logistics Section
    - Facilities Unit
    - Communications Unit
- Local maritime law enforcement tactical assets

Coast Guard Jurisdiction

The USCG Sector Commander is responsible for maritime law enforcement, public safety and environmental protection.

Federal Bureau of Investigation Jurisdiction

The USDOJ through the FBI has the lead responsibility for criminal investigations of terrorist acts or terrorist threats and for coordinating activities of other members of the law enforcement community to detect, prevent, preempt, investigate, and disrupt a terrorist attack.

Unified Command Organization

The make-up of the UC organization for a terrorist incident in the maritime environment will be tailored to the type of incident. For example, in a terrorist initiated radiological incident, the USDOE would be a member of the UC since they are the designated Coordinating Agency for the incident. In addition to the DOE, the USCG, FBI and the state(s) would also have representation in the UC. The following types of incidents would have representation from other entities:

- Radiological Incident: USDOE (Coordinating Agency)
- Biological Incident: Public Health Department
- Hazardous Material Incident: Local fire department, "RP"
- Oil Incident: "RP"
- Explosions: Local fire department

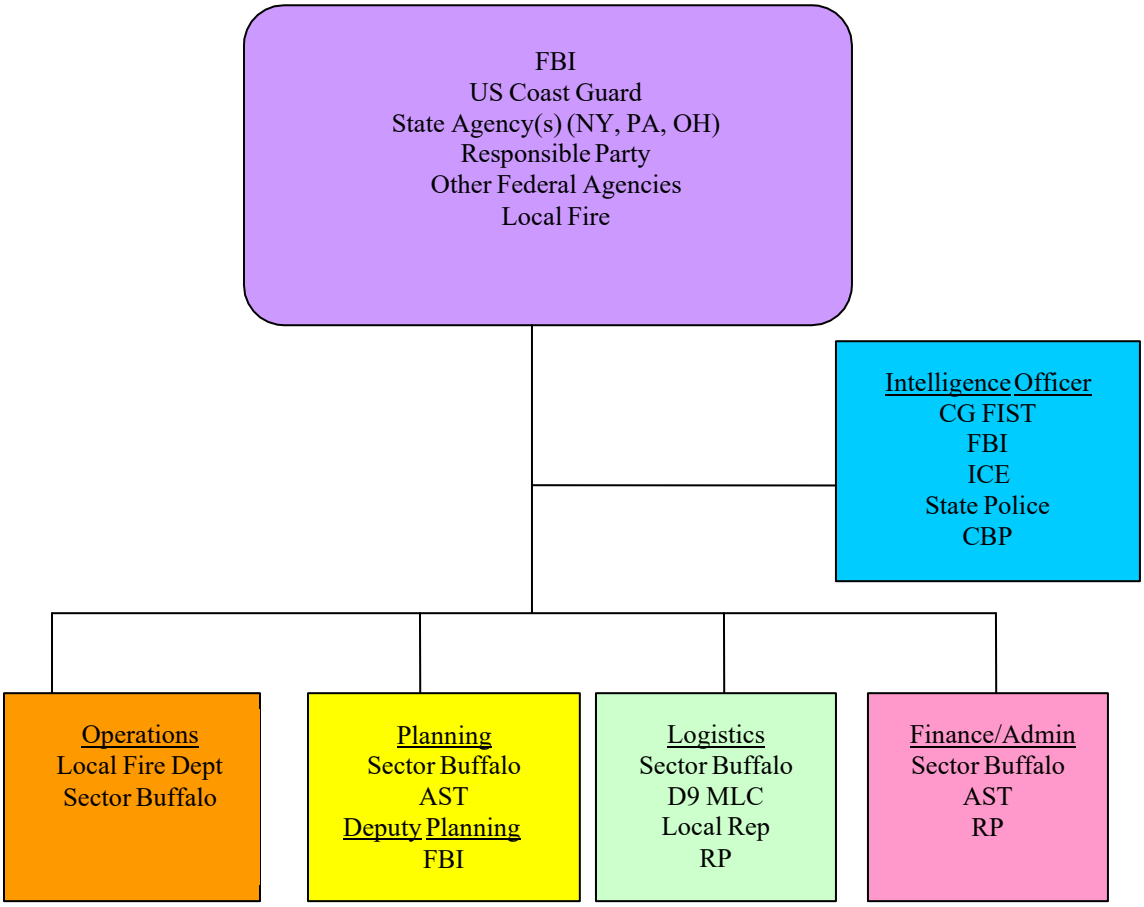

Figure 1 is an illustration of the agencies and/or entities that could serve in the UC and General Staff. The list of agencies is not exclusive.

The type of incident and incident complexity will determine the actual agencies that make up the UC and Command and General Staff.

Determinations to be made by the Coast Guard Incident Commander

- Initiate CIC procedures [Link to Critical Incident Communications Procedures]
- Determine Safe to Respond [Link to Safe to Respond Policy]
  - Work with the UC to determine the control zones (hot, warm, cold)
  - UC communicates location of zones to response personnel
  - Document Safe to Respond determination
- In consultation with the FBI, the USCG IC will determine the need to place a USCG liaison in the JOC.
  - CGIS to provide liaison
- In consultation with the FBI, the USCG IC will determine the need to raise the Maritime Security Level.

Determinations to be made by the Federal Bureau of Investigation

- Presence of secondary devices
- Extent of the crime scene

Unified Command Priorities

- Preserving life and minimizing risk to public health
- Preventing a terrorist act or expansion of an existing terrorist act
- Locating, controlling and disposing of a WMD
- Apprehending and prosecuting terrorists

Unified Command Objectives

- Conduct site assessment to determine presence of a secondary device
- Institute actions to protect the crime scene
- Communicate with port stakeholders
- Ensure the preservation of evidence
- Secure/Protect port infrastructure to prevent further/expanded attack

Unified Command Considerations

- Determine need to implement responder identification protocols
- Determine need to place law enforcement personnel on board commercial clean up vessels
- Determine the appropriate level of law enforcement protection to protect responders

Operations Section Organization Model

The UC and the type of incident to which it is responding, will dictate the agency that will fill the role of Deputy Operations for Response and Recovery. Figure 2 is an illustration of the agencies and/or entities that could serve as the OSC and Deputy OSC's. The list of agencies is not exclusive.

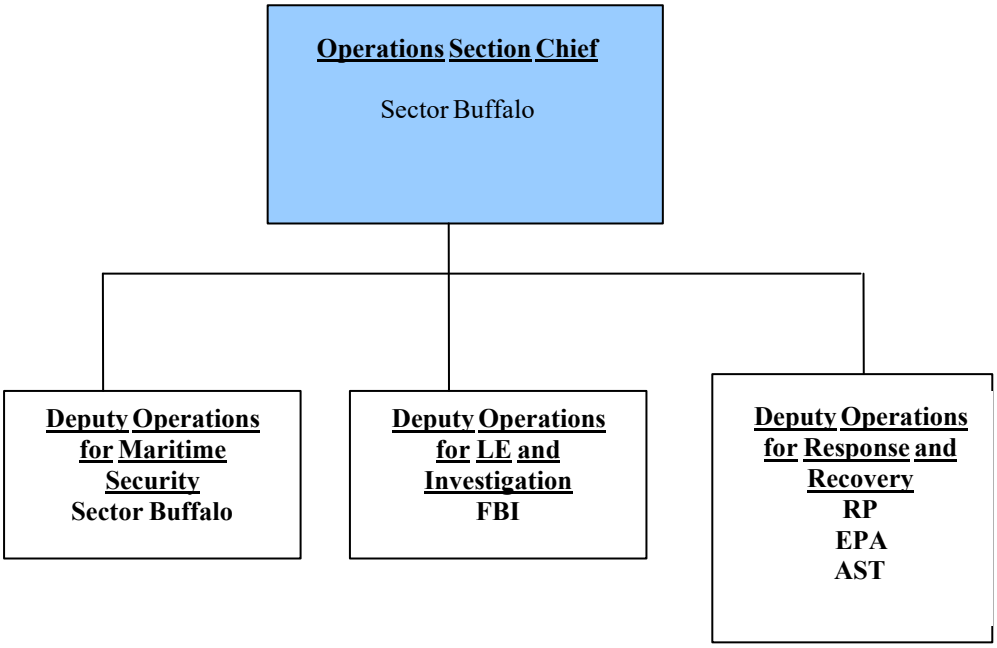

Figure 2. The Operations Section organization during a terrorist response involving both crisis and consequence management activities.

Operations Section Chief

For incidents that involve both crisis and consequence management the OSC's primary role shifts to one of coordination, ensuring that all tactical activities planned among the Deputy OSC's result in well coordinated joint operations. In this capacity the OSC:

- Ensures that the UC objectives are accomplished
- Minimizes duplication of effort among the Deputies
- Looks for opportunities to share limited resources
- Ensures that UC's receive comprehensive briefings
- Ensures that Operations fully supports the ICS Planning Process
- Ensures that tactical planning is coordinated among the Deputies

Working closely together, the Deputy OSC's develop tactical plans and manage their respective fields of expertise.

Deputy Operations for Maritime Security: A USCG officer serves as the Deputy Operations for Maritime Security and is responsible for the management of all the maritime law enforcement response activities. Responsibilities include but are not limited to:

- Supporting the development of tactical plans
- Coordinating closely with the FBI and other law enforcement agencies
- Coordinating search and rescue operations as necessary

- Establishing and enforcing safety and security zones

Deputy Operations for Law Enforcement and Investigation: An FBI Special Agent will serve as the Deputy OSC for Law Enforcement and Investigation. Responsibilities include but are not limited to:

- Managing the deployment and coordination of Federal law enforcement and investigative assets in support of the IAP
- Collection and dissemination of intelligence

Deputy Operations for Response and Recovery: The Deputy Operations for Response and Recovery is usually filled by the agency or entity with the legal responsibility for removing the public health and environmental threat. Responsibilities include but are not limited to:

- Support the development of tactical plans that address public health and environmental threats
- Coordinate closely with the FBI and other law enforcement agencies
- Depending on the incident, implement actions outlined in the appropriate consequence management Annex (oil, hazardous materials, radiological, biological)

Planning Section

In a terrorist incident response, the FBI will place a special agent in the Planning Section as a Deputy PSC. In this capacity the FBI is responsible for:

- Remaining up-to-date on the most current incident situation
- Acting as a conduit for requests for additional crisis assets
- Assisting with the development of the IAP

Coordination between the Incident Command Post and the Joint Operations Center

The JOC is an FBI-managed interagency command and control center for managing multiagency law enforcement and investigative responses to credible terrorist threats or an actual incident. The JOC structure calls for liaison representation to and from the UC to ensure that intelligence of relevance and value to consequence managers is passed to the UC's. The JOC:

- Is the decision making authority for law enforcement activities
- Manages and retains law enforcement sensitive intelligence

The JOC does not manage consequence management activities, but ensures that law enforcement activities are communicated and coordinated with the UC.

Coast Guard Liaison to the JOC

As a maritime law enforcement agency, the USCG would be a participant in the JOC with CGIS agents teamed with FBI agents to collect and monitor intelligence and investigative information to determine what is of particular interest to the USCG. In this capacity the Liaison would:

- Monitor intelligence and investigative activity and determine what is of particular interest to the USCG.
- Ensure that intelligence information relevant to consequence managers is passed to the UC's.

Special Teams

Some of the special teams that can be requested to provide support to both crisis and consequence management operations include:

- MSST
- District-9 FIST
- USCG Atlantic Area Incident Management Assist Team (IMAT) CGIS
- USCG Public Affairs Information Team (PIAT) USDOE RAP Team
- AST
- ATSDR

[Link to Special Teams Handbook]

Logistics Section

The unique nature of a terrorist incident requires the collection and sharing of sensitive or classified information. The establishment of the Incident Command Post must take into consideration the following:

- Facilities Unit
  - Include dedicated private space for law enforcement
- Communications Unit
  - Determine need to request communications support from CAMSLANT
    [Link to CAMSLANT Requesting Procedures Section 9790]
  - Determine need to provide Cellular STU-III support to the USCG IC

Local Maritime Law Enforcement Tactical Resources

Local law enforcement assets that can support incident operations:

- New York State Police (Marine Police)
- Pennsylvania State Police
- Ohio State Police
- USCBP
- USICE
- FBI
- DEC Law Enforcement

9700 EXTERNAL RESOURCES

9701 Activation Procedures for LANT IMAT

9702 Media Analysis

9703 Joint Information Center Query Record

9704 Radiation Medical ICS-206 Ohio

9705 Radiation Medical ICS-206 Pennsylvania

9706 Radiation Medical ICS-206 New York

9707 GAR Model

9708 ICS Compatible Site Safety Plan

9709 Specific Hazard Attachments

9710 Example 201

9711 Emergency Response Phase Historic Properties

9712 Safe to Respond

9713 Documentation of Actions Taken resulting in unavoidable injury to Historic Properties

9714 Information to be provided to the activation of Historic Property Specialist

9715 Protection of Historic Properties

9716 Interagency MOA on ESA

9717 ESA Emergency Response

9719 ESA Post Response

9721 Transition from an RP response to Federal Response

9722 Letter of Federal Assumption

9723 Draft Protocols for FOSCRs

9725 Volunteer Information

9728 Assessment Form

9729 Sketch Map

9730 Commercial Vessel Movement Criteria Flow Chart

9731 Instructions for Vessels Requesting Entry into a Safety Zone
9732 Instructions for Vessels Requesting to Shift within a Safety Zone
9733 Instructions for Vessels Requesting Departure from a Safety Zone
9735 Informal Consultation Example
9736 Vessel Decon Plan Example
9737 Example Clean Up Endpoints
9738 Fish and Wildlife Protection Options
9739 Wildlife (Bird) Recovery Operations/Procedures
9740 Guidance for Aerial Observation of Oil Spill
9741 Oil Spill Observation Checklist
9742 Checklist for Dispersant Application **9744** Tarball and Oil Debris Removal Plan
9745 NAVSUPSALV example request message
9747 Procedures for Temporary Flight Restriction
9748 Vessel and Facility Decon Priority Model
9749 Potential Response Functions with Corresponding Management Units
9750 Medical Form
9754 Sector Buffalo Quarantine Policy
9760 Guidance for Transitioning FOSC from CG to EPA
9761 Statement of Agreement on Transfer of FOSC from CG to EPA
9762 HAZMAT Incident Response Form
9763 Example of a CERCLA Admin Order
9764 Shoreline Clean is Clean Sign off Plan
9770 Example Multi-purpose ICP Layout
9771 Example MOA with Delaware National Guard
9780 Determining if CG is Coordinating Agency
9781 General Waste Containment and Disposal Checklist
9782 Waste Management and Disposal Plan
9785 Generic Demobilization Plan
9786 Sample Demobilization Plan
9790 Sample Message for CAMSLANT C4 Equipment Request
9792 Facility needs assessment worksheet **9795**
Sample Command Post Move Plan

9800 EXTERNAL ANNEXES

9810 GREAT LAKES SMALL VESSEL RADIOLOGICAL/NUCLEAR DETECTION REGIONAL ANNEX FOUO

9820 CANUSLAK ANNEX

9830 SMALL VESSEL MARINE FIRE FIGHTING PLAN

9840 GEOGRAPHIC RESPONSE PLANS; NEOH, NWPA, WNY, LAKE ONTARIO, SLS