

RRT5 In-Situ Burning Annex

RRT5 In-Situ Burning Annex

PURPOSE

This annex contains the background information and guidance necessary to aid the Federal On-Scene Coordinator (FOSC) in their consideration of whether to allow the technique of in situ burning (ISB) as an oil spill countermeasure.

REFERENCES AND ADDITIONAL LINKS

- [National Contingency Plan \(NCP\)](#)
- [Regional Contingency Plans \(RCPs\)](#)
- [Region 5 Sub Area Plans](#)
- [Great Lakes Area Contingency Plan \(GLACP\) \(via Homeport\)](#)
- [Geographic Response Plans \(GRPs\) \(via Homeport\)](#)
- [RRT 5 Habitat Fact Sheets](#)
- [RRT 5 Incident Specific RRT Checklist \(IS-RRT\)](#)
- [NOAA Office of Response and Restoration - ISB](#)
 - [Special Monitoring of Applied Response Technologies \(SMART\)](#)
 - [Sample Site Safety Plan for ISB](#)
- [Options for Minimizing Environmental Impacts of Freshwater Spill Response](#)
- [Selection Guide for Oil Spill Response Countermeasures](#)
- [Characteristics of Response Strategies: A Guide for Spill Response Planning in Marine Environments](#)

RESPONSIBILITIES

For this annex Lead Federal Agencies (LFAs) provide leadership, expertise and authorities to respond to oil discharges.

LFAs:

The US EPA and Coast Guard are the FOSC for any oil discharges in Region V that require emergency removal actions with the exception of incidents that:

- Occur from vessels or facilities owned, operated, or controlled by the Department of Defense (DOD) or Department of Energy (DOE)
- Are *non-emergency* removal actions of oil discharges from vessels or facilities owned, operated, or controlled by federal agencies *other than* the DOD or DOE

RRT5 In-Situ Burning Annex

SCOPE

The RRT has adopted this annex applicable to spill responses under the direct oversight of a FOSC. This annex authorizes the FOSC to use ISB as a response countermeasure to an oil discharge when he or she determines it is appropriate after key members of the RRT have been consulted and concur. This annex is subject to individual state laws and in the case of the use of burning agents during ISB by the NCP (40 CFR 300.910).

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, the use of certain alternative countermeasures, and ISB. Under certain specific conditions, ISB may offer a logistically simple, rapid, inexpensive, and relatively safe means for reducing impacts of an oil spill. Moreover, because a large portion of burned 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 the spreading and drifting of spilled oil fouls shorelines and threatens wildlife. In certain circumstances, such as oil spilled in ice conditions, burning may be the single viable response technique.

REQUIREMENTS

The requirements of this annex apply only to responses under the direct oversight of an FOSC, but its general application is strongly encouraged. The RRT acts as the regional coordinating body for response actions.

- 1) The appropriate state's approval is always required. In Region 5, the use of ISB as a response tool will be subject to State law and policy. When burning agents are used this is a requirement of the NCP. **(See attachments for appropriate state(s) approval processes).**
- 2) In accordance with (IAW) the NCP, US EPA must concur with the FOSCs recommendation to authorize the use of ISB. When burning agents are used this is a requirement of the NCP.
- 3) As a natural resource trustee, the Department of Interior (DOI) should be consulted with the decision to conduct ISB during a spill response overseen by a FOSC. The responsibility of concurrence is given to DOI as a federal natural resource trustee and because of its authorities, and potential assistance to the FOSC, regarding the Endangered Species Act (ESA) and potential representation of federally recognized tribal governments.
- 4) As a natural resource trustee, the Department of Commerce (DOC)/National Oceanic and Atmospheric Administration (NOAA) should be consulted when considering ISB. Notification should be from the RRT Co-Chairs via the DOC RRT member. NOAA Scientific Support Coordinator (SSC) should be contacted to assist in the decision-making process and may provide resources at risk.

RRT5 In-Situ Burning Annex

- 5) Tribal agency official(s) must be consulted on any decision to use ISB when a burn would reasonably be expected to impact those designated areas of tribal interests.
- 6) Approval must also be in concert with Canadian federal government officials, adjoining states and/or provinces, and local officials with approving jurisdictions, where deemed appropriate or necessary.

RESPONSE ACTIVITIES

FOSC Priorities

- Responder safety
- Public safety and hazard mitigation
- Public notification
- Environmental cleanup/restoration
- Proper transportation, storage and disposal of contaminated debris & waste

Considerations

ISB, for the purposes of this annex, is defined as the use of an ignition source to initiate the combustion of spilled oil that will burn due to its intrinsic properties and does not include the adding of a burning agent to sustain the burn.

The use of ISB in this annex is not for disposal purposes; rather, it is a response technique to be employed when an oil spill is virtually uncontrolled with the potential to spread and contaminate additional areas. It should also be considered as a cleanup technique for oiled habitats such as wetlands, where it is used in conjunction with other cleanup methods.

FOSC Tools

The following documents contain useful, detailed information to assist the FOSC in the use of ISB as an oil spill countermeasure.

- [Region 5 Sub Area Plans](#)
- [GRPs \(via Homeport\)](#)
- [Special Monitoring of Applied Response Technologies \(SMART\)](#)
- [RRT 5 IS-RRT Checklist](#)
- [RRT 5 Habitat Fact Sheets](#)
- [Options for Minimizing Environmental Impacts of Freshwater Spill Response](#)
- [Selection Guide for Oil Spill Response Countermeasures](#)
- [Characteristics of Response Strategies: A Guide for Spill Response Planning in Marine Environments](#)
- [RRT5 Website Planning and Response Tools](#)

RRT5 In-Situ Burning Annex

NOTIFICATION

- Request IS-RRT
 - Conduct emergency consultations with trustee agencies as applicable
- Ensure notification to appropriate stakeholders
- Coordinate public notifications

ASSETS AND RESOURCES

The following are able to support response to hazardous substance incidents, and should be considered as potential response resources:

- [USCG Ninth District Response Advisory Team \(DRAT\)](#)
- [USCG Atlantic Strike Team \(AST\)](#)
- [US EPA Environmental Response Team \(ERT\)](#)
- [US EPA Airborne Spectral Photometric Environmental Collection Technology \(ASPECT\)](#)
- [National Interagency Fire Center \(NIFC\)](#)
- [Interagency Modeling and Atmospheric Assessment Center \(IMAAC\)](#)
- For local subject matter experts see references

ENCLOSURES

1. State permits and/or approval process
 - a. Illinois EPA OER Request to Burn
2. [IS-RRT Checklist](#)

IEPA OER REQUEST TO BURN

IEMA Incident #: H-20_ _ _ _ _ (Must have an incident number)

Person requesting BURN PERMIT: _____

Person represents (company): _____

Date of request: _____ Time: _____

Amount to be burned: _____

Reason: _____

Location: _____

Check if same as reported spill location:

Land owner permission: YES NO

Mines & Minerals permission: YES NO

Complete during daylight: YES NO

Personnel on scene until burn is complete: YES NO

Notified local fire protection district: YES NO

Distance to nearest Public Road: _____ Direction: _____

Distance to nearest residential home(s): _____ Ditrection: _____

Wind direction: _____ Speed: _____ mph

Any special conditions: _____

GRANTED

DENIED

Person Authorizing Burn Permit



Incident-Specific RRT Checklist

Incident Specific RRTs are formed from standing team members when the RRT is activated for a response. Participation by member agencies will relate to the technical nature of the incident and its geographic location. Activities are determined by the operational requirements of the response to a specific incident. The appropriate level of activation shall be determined by the designated RRT chair for the incident. This completed checklist should be attached to the incident case file.

- Required members on call (Normally, co-chairs and coordinators, affected member and state agencies):

- Date/ Time:

- Prepared by:

- Summary of incident (A brief synopsis of the who/what/where/when/why/how of the incident):

- Current organization and actions taken:

R E G I O N A L R E S P O N S E T E A M 5

FOSC

Actions/ Approval requested by FOSC to RRT:

RRT

Decision/Action/ Recommendation on request from FOSC:

Rationale:

ESA Initial Consultation:

Completed with:

USFWS

Point of Contact:

NOAA

Point of Contact:

State(s)

Point(s) of Contact:

R E G I O N A L R E S P O N S E T E A M 5

Additional Notes

SIGNATURES

Member/ Agency:

Concur:

Non-Concur:

R E G I O N A L R E S P O N S E T E A M 5