REPORT OIL OR CHEMICAL SPILLS

to the

National Response Center

1-800-424-8802

24 Hour Notification Numbers

28 May 1992

REGION V

OIL AND HAZARDOUS SUBSTANCES

POLLUTION CONTINGENCY PLAN

To Report Spills
Call

National Response Center
(800) 424-8802
(24 Hours)

National Response Center
United States Coast Guard Headquarters
Washington, DC

Regional Response Centers

Emergency Response 24-Hour Emergency Number: (312) 353-2318
United States Environmental Protection Agency
Region V
Waste Management Division
Office of Superfund
Emergency and Enforcement Response Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

Emergency Response 24-Hour Emergency Number: (216) 522-3984
United States Coast Guard
Ninth Coast Guard District Office
1240 East Ninth Street
Cleveland, Ohio 44199-2060

Emergency Response 24-Hour Emergency Number: (314) 539-3706
United States Coast Guard
Second Coast Guard District Office
1222 Spruce Street
St. Louis, Missouri 63103-2832

28 May 1992

REGION V

LETTER OF PROMULGATION

In accordance with the provisions of the Federal Water Pollution Control Act of 1972 as amended by the Clean Water Act of 1977, and Section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, a National Oil and Hazardous Substances Contingency Plan was developed by the United States Environmental Protection Agency. Section 300.41 of the National Plan states that Regional Contingency Plans shall be prepared for each standard Federal region. The Region V Oil and Hazardous Materials Contingency Plan has been developed with cooperation of all designated Federal agencies and State governments. This plan provides a mechanism for coordinating responses to releases of oil or hazardous materials within the States of Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin, and within the Tribal lands of the 29 Federally recognized Indian Tribes in Region V (listed in Annex 3).

This plan is effective upon receipt and supersedes the previous plans in their entirety. Changes to this plan will be noted on the Amendments page and consecutively numbered. Comments and recommendations regarding this plan should be addressed to U.S. EPA Region V. Requests for amendments and changes, such as those changes anticipated as a result of the recent passage of The Oil Pollution Act of 1990, will be addressed during regularly scheduled RRT meetings. The three-ring binder is intended to be reused, allowing for ease of inserting updated information.

Copies of this plan may be obtained from:

U.S. Environmental Protection Agency
Office of Superfund (HSE-5J)
77 West Jackson Boulevard
Chicago, IL 60604

Robert J. Bowden
U.S. Environmental Protection Agency
Region V
Co-Chair, Region V RRT

Captain Robert W. Mason
U.S. Coast Guard
Ninth Coast Guard District
Co-Chair, Region V RRT

TABLE OF CONTENTS

NCP/RCP CROSSWALK

NCP	RCP
Subpart A - Introduction	
300.1 Purpose and objectives	A.1 General Purpose and Objective
300.2 Authority and applicability	A.2 Authority
300.3 Scope	A.3 Scope and Provisions
300.4 Abbreviations	Y Annex 18: Acronyms
300.5 Definitions	A.4 Definitions
Subpart B - Responsibility and Organization for Response	
300.100 Duties of President delegated to federal agencies	
300.105 General organization concepts	B.3 National Response Team
300.110 National Response Team	B.1 Introduction
300.115 Regional Response Teams	B.3 National Response Team
300.120 On-Scene coordinators and remedial project managers: general responsibilities	B.4 Regional Response Team
300.125 Notification and communications	B.7 OSC/RPM Responsibilities
300.130 Determinations to initiate response and special conditions	D.2 Communications E Activation of the RRT
300.135 Response operations	D Response Operations
300.140 Multi-regional responses	B.5 Multi-regional Responses
300.145 Special teams and other assistance available to OSCs/RPMs	E Resources
300.150 Worker health and safety	D.5 Worker Health and Safety
300.155 Public information and community relations	D.8 Community Relations
300.160 Documentation and cost recovery	F.4 Documentation for Enforcement and Cost Recovery
300.165 OSC reports	B.7 OSC/RPM Responsibilities
300.170 Federal agency participation	B.6 Federal Agency Responsibilities
300.175 Federal agencies: additional responsibilities and assistance	B.6 Federal Agency Responsibilities
300.180 State and local participation in response	B.8 State and Local Agency Responsibilities
300.185 Nongovernmental participation	B.9 Interregional Agencies

NCP/RCP Crosswalk (Cont.)

Subpart C - Planning and Preparedness	
300.200 General	G.1 Planning - Regional Level
300.205 Planning and coordination structure	G.1 Planning - Regional Level
300.210 Federal contingency plans	G.2 Planning - State Level
300.215 Title III local emergency response plans	G.3 Planning - Local Level
300.220 Related Title III issues	G.1 Planning - Regional Level G.1 Planning - Regional Level
Subpart D - Operational Response Phases for Oil Removal	
300.300 Phase I - Discovery or notification	D.2.B Notification of Oil Releases
300.305 Phase II - Preliminary Assessment and initiation of action	D.3 Source Control D.9 Cleanup and Recovery
300.310 Phase III - Containment 300.315 Phase IV - Documentation and Cost Recovery	F.4 Documentation for Enforcement and Cost Recovery
300.320 General Pattern of Response	D Response Operations
300.330 Wildlife Conservation	D.6 Resource Protection
300.335 Funding	F.2 Funding
Subpart E - Hazardous Substance Response	
300.400 General	E Activation of the RRT
300.405 Discovery or notification	D.2.C Notification of Hazardous Substances Releases
Subpart F - State Involvement in Hazardous Substance Response	B.8 State and Local Responsibilities
Subpart G - Trustees for Natural Resources	D.7.A Federal Trustees
Subpart H - Participation by Other Persons	D.2.A General Procedures
Subpart I - Administrative Record	D.8 Community Relations
Subpart J - Use of Dispersants and Other Chemicals	D.3.B Chemical Agent Use Q Annex 10: Chemical Use Checklist

RECORD OF AMENDMENTS

Region V Oil and Hazardous Substances Contingency Plan

Amendment Number:	Date Submitted:	Submitted By:	Page and Content Affected:	Date Changed:

SECTION A: INTRODUCTION

1. AUTHORITY

The Regional Oil and Hazardous Substances Pollution Contingency Plan (RCP) is developed pursuant to Section 300.210 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The NCP is required by Section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, by Section 311(c)(2) of the Clean Water Act (CWA), and by the Oil Pollution Act of 1990 (OPA). The RCP is applicable to response actions taken pursuant to the authorities under CERCLA, Section 311 of CWA, and OPA.

2. GENERAL PURPOSE AND OBJECTIVE

The purpose of this plan is to fulfill the requirement of the NCP 300.210 (b). The RCP is designed to coordinate timely and effective response among the Federal On-Scene Coordinators (OSCs), Remedial Project Managers (RPMs), various Federal agencies, State and local representatives, and other organizations to minimize damage resulting from releases of oil or hazardous substances, pollutants, or contaminants. The RCP includes information from governmental, commercial, and other sources regarding facilities and resources in the Region. The plan outlines the type of assistance available to OSCs from Regional Response Team (RRT) member agencies during response actions.

The objective of this plan is to describe response protocols and assist in providing a coordinated response capability in the event of a release or spill which poses a threat to the environment or to human health and welfare. Initial actions taken by the OSC and/or other appropriate personnel should be to determine whether proper response actions have been initiated. If the party or parties responsible for the release or spill do not take appropriate actions, or if the party or parties responsible for the release or spill are unknown, the OSC shall respond and implement provisions of the NCP and applicable agency guidance, and coordinate activities as outlined in this RCP.

3. SCOPE AND PROVISIONS

This plan applies to Region V RRT member agencies and covers discharge or threats of discharge of oil into or upon navigable waters of the United States and adjoining shorelines or which may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States; releases or substantial threats of releases of hazardous substances into the environment; and releases or substantial threats of releases of pollutants or contaminants which may present an imminent and substantial danger to public health or welfare in the States of Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin, and in the lands of the Federally recognized Indian Tribes in Region V (listed in Annex 3).

This plan provides:

(a) Identification of primary responsibilities and jurisdictions among Federal, State, and local governments in response actions.

(b) Synopses of Federal response actions in accordance with the CWA, CERCLA, and OPA.

(c) Recommended response techniques.

(d) Information concerning useful facilities and resources from governmental, commercial, academic, and other sources.

(e) Information concerning contingency planning and preparedness.

4. DEFINITIONS

Unless otherwise specified, references made to sections and annexes are to this plan. Definitions as used in the NCP are used in this RCP without change.

SECTION B: ORGANIZATION AND RESPONSIBILITIES

1. INTRODUCTION

A. PREVENTION AND RESPONSE PLANNING

The responsibility for preventing spills and planning response to a spill generally lies with the party storing, transporting, or using the material. Often the conditions of storage, transport, and use are regulated by local, State, or Federal programs. Some of the programs require permits or specify in detail the preventive measures and planning which are required of users, transporters, and storers. Some of these governmental programs include inspections to verify adequacy of preventive measures. Only in the most extreme circumstances are any of the governmental agencies authorized to intervene to prevent a spill from occurring.

Most of the preventive actions and response planning required by governmental programs focus on protection of the public's safety and on response to the site of a potential spill. Action relating to preventing and planning environmental protection and off-site impacts are less commonly required by governmental programs.

B. RESPONSE TO PUBLIC SAFETY AND PROPERTY THREATS CAUSED BY SPILLS

When a spill poses public safety and property threats via potential fires, explosions, toxic clouds, or other means, local officials are usually in command of the incident (see Subsection D.1, Incident Command Protocol). The party responsible for the incident is required to cooperate with and aid the local police and fire agencies but typically does not direct or implement the fire fighting, evacuation, or other first responses to the spill. If highly specialized activities such as off-loading of tank cars or repackaging of hazardous chemicals are required, the responsible party may implement the actions under the general direction of the local public safety commander.

In most States, the role of State agencies in public safety response during the early stages of an incident is to provide advice to local commanders as soon as possible. During major incidents, State and Federal authorities may be able to provide additional assistance to the local commander at the spill scene by conducting sampling and analysis of chemicals, providing specialized contractors or equipment, or by providing detailed advice or other supporting functions. Seldom will State or Federal authorities assume command from the local fire or police commander for short-term, on-site, public safety related issues.

C. RESPONSE TO ENVIRONMENTAL AND HEALTH THREATS CAUSED BY SPILLS

A number of State and Federal programs require responsible parties to investigate and remedy environmental and health threats caused by their spills. Often these actions take place off-site of the spill. They usually begin somewhat later than the public safety protection response, but they can go on for a much longer period of time. The actions can include the placement of containment and recovery booms and pads, sampling of run-off and rivers, excavating soil, sampling smoke, performing hydrogeological investigations, retrieving and cleaning affected

waterfowl, closing drinking water intakes, and providing an alternate water supply.

Generally, in a major incident, the environmental and health protection actions that are conducted by the responsible party are overseen by State or Federal authorities, not the local commander. Local police and fire personnel are, however, often asked to assist.

Sometimes a responsible party is unable or unwilling to adequately or quickly undertake the environmental and health protection actions required by State or Federal authorities. In those cases State or Federal authorities can assume a more direct role. Usually this is done through investigation or cleanup contractors using governmental funds such as State or Federal Superfunds or the Oil Pollution Fund. The costs of these direct government actions will usually be recovered later from the responsible party. The decision to assume governmental control of environmental and health follow-up of an incident is dependent on the severity of the incident, the cost and duration of required actions, and the resources available to the State in which the incident occurred.

2. POLICY

It is the policy of the RRT that response actions on non-Federal lands should be monitored or implemented by the lowest level of government with authority and capability to conduct such activities. The lowest level will generally be local government agencies. (See Subsection D.1 for a discussion of the incident command protocol for response actions in Region V.) When incident response is beyond the capability of the State response, or sufficient removal operations are not being conducted to protect the population and environment, the Federal OSC will evaluate the need for Federal response action.

Additionally, in the absence of a State or local request for assistance, the United States Environmental Protection Agency (U.S. EPA) or the United States Coast Guard (USCG) is authorized to take response measures deemed necessary to protect the public health or welfare or the environment from discharges of oil or releases of hazardous substances, pollutants, or contaminants. For this reason, it is necessary for the designated State contact to communicate with the Federal OSC following an incident that requires or that could potentially require immediate attention. In the absence of sufficient site assessment information, the OSC may schedule an immediate on-site visit to assess the situation. If sufficient information is unavailable through the State contact, the OSC may have to deal directly with local officials during the site assessment. The OSC coordinates, directs, and reviews the work of other agencies, responsible parties, and contractors to ensure compliance with the NCP, decision document, consent decree, administrative order, and/or lead agency-approved plans.

3. NATIONAL RESPONSE TEAM (NRT)

A discussion of the NRT and its responses and functions is presented in Section 300.100 of the NCP and remains unchanged in this RCP.

4. REGIONAL RESPONSE TEAM (RRT)

The RRT is a Regional body for planning and preparedness activities before response activities occur, as well as for coordination of assistance and advice to the OSC/RPM during site-specific incidents. Federal RRT member agencies have duties established by Statute or Executive Order which may

apply to Federal response actions following or in prevention of a discharge of oil or a release or a threat of release of a hazardous substance, pollutant, or contaminant.

The principal components of the RRT are a standing RRT and incident-specific RRTs. The standing RRT consists of designated representatives from each participating Federal agency and each State environmental agency. Each incident-specific RRT is formed from the standing team when the RRT is activated for a response, and consists of representatives of appropriate Federal agencies, appropriate State agencies, and representatives of local governments.

Each member should designate one member and at least one alternate member to the standing RRT. Agencies whose regional subdivisions do not correspond to the standard Federal regions may designate additional representatives to the standing RRT to ensure appropriate coverage of the standard Federal region. Member States may also designate one member and at least one alternate member to the RRT. Federally recognized Indian Tribal governments may arrange for representation on the RRT. Other interested parties may attend and observe RRT meetings. The usual process by which the RRT reaches its decisions is by consensus. However, in instances where a decision is reached by means of a vote, the voting capacity of each Federal member agency and other RRT member organizations is limited to one vote per member agency or organization.

The first Federal official affiliated with an RRT agency to arrive at the scene of a discharge or release should coordinate activities under the NCP, RCP, and agency guidance until the predesignated OSC is available. That Federal official should consult directly with the predesignated OSC regarding any necessary initial actions. Fund-financed operations must be authorized by the OSC prior to implementation.

A. STANDING RRT

The Co-Chairs of the Region V Standing RRT are the Chief of the Emergency and Enforcement Response Branch, U.S. EPA Region V; and the Chief of the Marine Safety Division, Ninth Coast Guard District. When the RRT is activated for a response action, the Chair shall be the member agency providing the OSC/RPM.

During an incident-specific activation, the Chair is the U.S. EPA or USCG representative, depending on where the release occurred. The Co-Chairs may designate other U.S. EPA and USCG employees to act as the Co-Chair.

The list of current members of the standing RRT is provided in Annex 1.

The role of the standing RRT includes communications and procedures planning, coordination, training, evaluation of responses, preparedness, and related matters on a Region-wide basis. These activities include, but are not limited to:

(1) Providing technical assistance for preparedness and conducting and participating as necessary in training and exercises to encourage preparedness activities of the response community within the Region (Region V will participate in one exercise per year);

(2) Reviewing and updating the RCP;

(3) Discussing, modifying, and adopting procedures to enhance the various aspects of response coordination between local, Tribal, State, Regional, and Federal response efforts;

(4) Reviewing and commenting, where practicable, on local emergency response plans (required by SARA, Title III). Such reviews are conducted upon the request of a Local Emergency Planning Committee (LEPC), forwarded to the RRT by a State Emergency Response Commission (SERC; in Wisconsin, the State Emergency Response Board, or SERB). The standing RRT may also review and comment on other issues concerning the preparation or implementation of related response plans;

(5) Reviewing, evaluating, and commenting on Regional and local responses to discharges or releases, and recommending improvements, as appropriate (see Annex 12 for RRT Contingency Plan Evaluation Criteria);

(6) Reviewing OSC actions to ensure that RCPs and OSC contingency plans are effective;

(7) Encouraging the State and local response community to improve its preparedness for response;

(8) Conducting advance planning for use of dispersants, surface collection agents, burning agents, biological additives, or other chemical agents;

(8) Meeting three times annually, rotating meetings among the States, to review response actions, address preparedness and pre-response activities, and consider changes to the RCP;

(9) Providing reports on RRT activities to the NRT twice a year, no later than January 31 and July 31;

(10) Integrating, to the extent possible, ongoing planning and preparedness activities with RRT preparedness initiatives, and all RRT agencies;

(11) Recommending revisions of the NCP to the NRT, based on observations of response operations;

(12) Providing resources for response to major discharges or releases outside the Region, upon request;

(13) Evaluating the preparedness of the participating agencies and the effectiveness of Federal response to discharges and releases;

(14) Preparing an annual work plan to coordinate emergency response and preparedness activities; and

(15) Coordinating planning and preparedness with RRTs in adjacent Regions.

To carry out the pre-response preparedness and planning charge of the RRT, a management committee consisting of the CERCLA-funded staff of member agencies has been established

to identify and facilitate implementations of preparedness and pre-response responsibilities. (The text of the U.S. EPA Memorandum of Understanding, dated November 21, 1985, regarding CERCLA funding of RRT members' travel costs to meetings of the RRT, is provided in Annex 11.) Workgroups will be established as projects and particular work efforts are identified. The necessity of the workgroups shall be re-evaluated annually.

B. INCIDENT-SPECIFIC RRT

The circumstances under which an incident-specific RRT will convene are discussed in Section D of this plan.

An incident-specific RRT has one Chair--the Regional supervisor of the Federal OSC/RPM for the response to the incident. The role of the incident-specific team is determined by the operational requirements of the response to a specific discharge or release. Participation is relative to the technical nature and geographic location of the discharge or release. The RRT Chair coordinates with the RRT membership and the OSC/RPM for the incident, to determine the appropriate level of RRT member activation. Member agencies and States participating with the RRT must ensure that designated representatives or alternates can function as resource personnel for the OSC/RPM during incident-specific events.

When activated, members of an incident-specific RRT may be requested to:

(1) Provide advice, as requested by the OSC/RPM, recommending courses of action for consideration by the OSC/RPM;

(2) Monitor and evaluate reports from the OSC/RPM;

(3) Advise the OSC/RPM on the duration and extent of Federal response and recommend to the OSC/RPM specific actions to respond to a discharge or release;

(4) Request other Federal, State, or local government or private agencies to provide resources under their existing authorities to respond to a discharge or release or to monitor response operations;

(5) Recommend a change of OSC/RPM to the RRT Co-Chairs, if circumstances warrant (e.g., substantial movement of the pollution into the predesignated area of another OSC lead agency); and

(6) Ensure continual communications with the National Response Center (NRC) as significant developments occur.

5. MULTI-REGIONAL RESPONSES

If a discharge or release moves from the area covered by one RCP or OSC/RPM contingency plan into another area, the authority for response actions should likewise shift. If a discharge or release affects areas covered by two or more RCPs, the response mechanisms of both may be affected. In this case, response actions of all regions concerned shall be fully coordinated as detailed in the RCPs.

There shall be only one OSC/RPM at any time during the course of a specific response operation. Should a discharge or release affect two or more areas, U.S. EPA, USCG, the Department of Defense,

Department of Energy, or other lead agency, as appropriate, shall give prime consideration to the area vulnerable to the greatest threat, in determining which agency should provide the OSC and/or RPM. The RRT shall designate the OSC and/or RPM if the RRT member agencies who have response authority within the affected area are unable to agree on the designation. The NRT shall designate the OSC and/or RPM if members of one RRT or two adjacent RRTs are unable to agree on the designation.

Where USCG has initially provided the OSC for response to a release from hazardous waste management facilities located in the coastal zone, responsibility for response action shall shift to U.S. EPA or another Federal agency, as appropriate.

The OSC/RPM shall be provided by the Region within which the release occurs, or according to preestablished protocols described in the interregional contingency plans and Section C of this RCP.

6. FEDERAL AGENCY RESPONSIBILITIES

The Federal agencies listed in this section have duties established by statute, executive order, or Presidential directive which may apply to Federal response actions following, or in prevention of, the discharge of oil or release of a hazardous substance, pollutant, or contaminant. Some of these agencies also have duties relating to the rehabilitation, restoration, or replacement of natural resources injured or lost as a result of such discharge or release.

Federal agencies should plan for emergencies and develop procedures for addressing oil discharges and releases of hazardous substances, pollutants, or contaminants from vessels and facilities under their jurisdiction, custody, or control. All Federal RRT members or their representatives should provide OSCs/RPMs with assistance from their respective Federal agencies commensurate with agency responsibilities, resources, and capabilities within the Region. During a response action, the members of the RRT should seek to make available the resources of their agencies to the OSC/RPM. Specifically, Federal member agency responsibilities include:

(a) Assisting RRTs and OSCs/RPMs in formulating RCPs;

(b) Informing the RRT of changes in the availability of their response resources; and

(c) Reporting discharges and releases from facilities or vessels under their jurisdiction or control.

Following is a list of Federal agencies and their responsibilities and functions.

A. THE DEPARTMENT OF AGRICULTURE

The Department of Agriculture (USDA) maintains a Regional Emergency Team in each of the ten Standard Federal Regions to provide liaison and coordination with Federal agencies operating on a Regional basis. Regional Emergency Teams are composed of representatives of USDA agencies having essential emergency functions at the Regional level. These agencies are:

Forest Services (FS): This agency is responsible for prevention and control of fires in rural areas, in cooperation with State Foresters and appropriate Federal agencies; and emergency production, availability, and utilization of timber and timber products, in cooperation with the Department of Commerce. The agency has capabilities to

provide emergency communications systems, specialized aircraft, and human support facilities for large groups of people, and has specially trained incident management teams. The U.S. Forest Service is the designated USDA representative to the RRT.

Food and Nutrition Service (FNS): FNS, through the Food Distribution Program, provides food as emergency assistance to disaster victims. In appropriate emergency situations, FNS will authorize State agencies to issue food stamps based on emergency procedure.

Food Safety and Inspection Service (FSIS): FSIS tests meat and poultry products for the presence of violative drugs, chemical residues, and other adulterants.

Agricultural Stabilization and Conservation Service (ASCS): In cooperation with the Forest Service, Soil Conservation Service, and Army Corps of Engineers, the ASCS is responsible for emergency plans and preparedness programs for food processing, storage, and distribution through the wholesale level.

Animal and Plant Health Inspection Service (APHIS): This agency provides expertise on plant and animal diseases and health.

National Agricultural Statistics Service: This agency serves as a source of data on crops, livestock, poultry, dairy products, and labor. State Statistical Offices collect and publish local information on these topics.

B. THE DEPARTMENT OF COMMERCE

The Department of Commerce (DOC), through the National Oceanic and Atmospheric Administration (NOAA), has three roles within Region V: 1) Scientific Support Coordinator (SSC), in accordance with the NCP; 2) National Resource Trustee, in accordance with the NCP; and 3) RRT member. This member can provide scientific expertise on living marine resources for which it is responsible; provide current and predicted meteorologic, hydrologic, ice, and oceanographic conditions; provide charts and maps; and can provide communication services to the general public, various levels of government, and the media via its weather wire and weather radio system.

C. THE DEPARTMENT OF DEFENSE

The Department of Defense (DOD), consistent with its operational requirements, may provide assistance in critical oil and hazardous materials incidents, in the maintenance of navigation channels, and in removal and salvage of navigation obstructions. The DOD will provide the OSC and RRT Chair for releases occurring on DOD property or facilities.

The U.S. Army Corps of Engineers (COE) provides potable water when a source has become contaminated.

D. THE DEPARTMENT OF ENERGY

The Department of Energy (DOE) provides the designated OSC/RPM for responses to releases on or from any facility or vessel under its jurisdiction. DOE administers, implements, and coordinates the Federal Radiological Monitoring and Assessment Plan (FRMAP). Under the Federal Radiological Emergency response Plan (FRERP), DOE provides advice and assistance to the RRT regarding the identification of the source and extent of radioactive contamination, and removal and disposal of radioactive releases.

E. THE FEDERAL EMERGENCY MANAGEMENT AGENCY

The Federal Emergency Management Agency (FEMA) requires the development, evaluation, and exercise of all-hazard contingency plans for all FEMA-funded jurisdictions at the State and local levels. SARA Title III plans are often annexes of the all-hazard plan. FEMA monitors and provides technical assistance regarding public sector emergency response training and planning for incidents involving hazardous materials. In a response, 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.

If the President declares a disaster or emergency, FEMA coordinates all Federal assistance, including temporary housing. The OSC coordinates with the Federal Coordinating Officer (FCO) in a situation where both authorities are active.

FEMA's national Emergency Support Team and Regional Emergency Response Teams provide coordination of Federal response in extraordinary situations of unique national significance, such as commercial nuclear power plant or nuclear weapons accidents and catastrophic natural disasters.

F. THE GENERAL SERVICES ADMINISTRATION

The General Services Administration (GSA) upon request provides expedited logistical and telecommunications support to Federal agencies which are members of the NRT. The support includes, but is not limited to, provision of space, transportation, telecommunications, supplies, and procurement-related services. It may be furnished through GSA personnel who are located at the scene of the oil or hazardous material release, or at their regular duty stations, depending on the specific requirements of the Federal OSC or the emergency situation. Expenses incurred by GSA in providing requested assistance to other agencies must be reimbursed.

G. THE DEPARTMENT OF HEALTH AND HUMAN SERVICES

The Department of Health and Human Services (HHS) is responsible for providing expertise and advice on public health and worker safety issues associated with releases or threatened releases of hazardous substances; for all health studies and surveys conducted under CERCLA; and for providing and maintaining information concerning the health effects of toxic substances. The U.S. Public Health Service (PHS) has designated the Centers for Disease Control (CDC) representative to the RRT. This person is responsible for coordinating all

public health responses on the Federal level and for coordinating all responses with State and local health agencies.

The Agency for Toxic Substance and Disease Registry (ATSDR): ATSDR is the lead Federal public health agency for hazardous material incidents. Two ATSDR representatives are assigned to each U.S. EPA Region to assist in U.S. EPA/ATSDR communications. Regional representatives can also assist in emergency response events that involve RRT issues by coordinating with ATSDR headquarters Emergency Response and Consultation Branch and with the CDC RRT representative. Under CERCLA Section 104(i), ATSDR is required to:

(1) Establish appropriate disease/exposure registries;

(2) Provide medical care and testing of exposed individuals in cases of public emergencies;

(3) Develop, maintain, and provide information on health effects of toxic substances;

(4) Conduct research to determine relationships between exposure to toxic substances and illness;

(5) Together with U.S. EPA, develop guidelines for toxicological profiles for hazardous substances; and

(6) Develop educational materials related to health effects of toxic substances for health professionals.

Additionally, ATDSR operates a 24-hour number to address public health issues (see listing of 24-hour contacts in Annex 2).

H. THE DEPARTMENT OF THE INTERIOR

The Department of the Interior (DOI) can provide information concerning the lands and resources specifically under DOI jurisdiction, as well as offer technical expertise related to geology, hydrology, minerals, fish and wildlife, cultural resources, and recreation resources. Under Executive Order 12580, DOI is among those agencies designated by the NCP as a Federal Trustee for Natural Resources.

DOI has direct jurisdiction for the protection of resources on its own lands, as well as trustee responsibilities for certain natural resources, regardless of location. The DOI natural resource trusteeship that extends beyond DOI site boundaries includes migratory birds, anadromous fish, and endangered/threatened species and their critical habitat.

The Regional Environmental Officer, Office of Environmental Affairs (Chicago), represents DOI on the RRT, and is responsible for coordinating RRT/DOI activities. Within the Department, individual bureaus have specific responsibilities and capabilities as follows:

The U.S. Fish and Wildlife Service (USFWS): USFWS provides expertise on migratory birds, endangered and threatened species, and wildlife habitat, and can advise on fish and wildlife protection methods. The agency can also provide information on national wildlife refuges and national fish hatcheries managed by USFWS. It has the expertise necessary to disperse or capture birds, and to coordinate bird rehabilitation activities at a spill site in conjunction with respective State wildlife conservation agencies. USFWS issues migratory bird rehabilitation permits to qualified individuals and/or organizations that may be available to assist in rehabilitation operations related to oil spill incidents.

The National Park Service (NPS): NPS provides expertise on historic, archeological, architectural, and recreational resources and sites on the National Register of Historic Places. The NPS can also provide information on units of the national park system, including national parks, lake shores, monuments, national historic sites, rivers, and recreation areas.

The U.S. Geological Survey (USGS): USGS provides advice and information concerning geohydrologic, geologic and geochemical data, and ground and surface water data, as well as maps. USGS maintains stream flow gauges in every State and can provide historical stream flow information, assist in predicting the time/travel/trajectory of spills, and can collect and analyze surface and groundwater samples.

The Bureau of Indian Affairs (BIA): BIA coordinates activities affecting Indian Tribal lands, and provides assistance in identifying Indian Tribal government officials.

The Bureau of Land Management (BLM): BLM has expertise in minerals, soils, vegetation, archeology, and wildlife habitat.

The Bureau of Mines (BOM): BOM assists in the analysis and identification of inorganic hazardous substances, and has technical expertise in metals and metallurgy relevant to site cleanup. BOM has expertise in minerals (occurrence, production, and research), mining, mining techniques, and metallurgical practices.

All bureaus of the Department of the Interior may be contacted through the Regional Environmental Officer, the designated member of the RRT.

I. THE DEPARTMENT OF JUSTICE

The Department of Justice (DOJ) members of the RRT serve as representatives of the Department of Justice and not as legal counsel to the RRT or its member agencies. Although the DOJ representative to the RRT is not a substitute for member agencies' in-house counsel, the DOJ representative will be able to offer the advice, views, and expertise of the Department with respect to the RRT's long-term planning and incident-specific functions.

Generally speaking, the Department's primary role is to serve as litigation counsel for the Federal government and as legal counsel on enforcement and inter-agency matters. As a consequence, DOJ participation in RRT activities will ordinarily focus on litigation concerns regarding response activities and inter-agency coordination. In this capacity, the role of the

DOJ representative might include: general legal advice; review and comment on regional planning and procedural documents; and incident-specific assistance, including assigning staff attorneys when the incident may result in litigation or raise difficult issues of interagency coordination.

J. THE DEPARTMENT OF LABOR

The Department of Labor (DOL), through the Occupational Safety and Health Administration (OSHA), conducts safety and health inspections of hazardous waste sites to ensure that employees are being protected and to determine compliance with its regulations. Through OSHA, DOL will also provide the OSC/RPM with advice, guidance, and assistance regarding hazards to persons involved in removal or control of oil or chemical spills and in the precautions necessary to prevent endangerment of their health and safety.

K. THE DEPARTMENT OF STATE

The Department of State (DOS) will lead in developing joint international contingency plans. It will also provide assistance in coordination when a pollution release crosses international boundaries or involves foreign flag vessels. Additionally, this Department will coordinate requests for assistance from the Government of Canada and U.S. proposals for conducting research at incidents that occur in Canadian waters.

L. THE DEPARTMENT OF TRANSPORTATION

The Department of Transportation (DOT), through USCG, provides the Co-Chair of the Region V RRT and predesignated OSCs for the Great Lakes Coastal Zone and specified ports and harbors in Region V. DOT also provides expertise regarding transportation of oil or hazardous materials. Through USCG, DOT supplies expertise in the domestic/international fields of port safety and security; marine law enforcement, navigation, and construction; and the manning, operation, and safety of vessels and marine facilities. USCG maintains continuously manned facilities that are capable of command, control, and surveillance for oil or hazardous substances releases occurring on the waters of the United States, and may provide these services to the OSC.

M. THE U.S. ENVIRONMENTAL PROTECTION AGENCY

U.S. EPA provides the Co-Chair of the Region V RRT and provides OSCs for the inland zone and for all other areas for which other agencies do not provide OSCs. U.S. EPA is responsible for providing expertise regarding environmental effects of pollution releases and environmental pollution control techniques. U.S. EPA will also advise the RRT and the OSC of the degree of hazard a particular release poses to the public health and safety, and will coordinate scientific support, including damage assessment, in inland regions.

7. OSC/RPM RESPONSIBILITIES

The OSC directs Federal Superfund-financed response efforts and coordinates all other Federal efforts at the scene of a discharge or release. As part of the planning and preparation for response, the OSCs/RPMs shall be designated by the Regional or district head of the lead agency. OSC responsibilities in the event of a discharge or release include the following:

(a) Notify the appropriate State and Federal agencies. OSC notification responsibilities are discussed in detail in Subsection D.1.D of this plan.

(b) Determine whether proper response actions have been initiated. If the party responsible for the release or spill does not act promptly in accordance with the directions of the OSC or does not take appropriate actions, or if the party is unknown, the OSC shall respond in accordance with provisions of the NCP and agency guidance, and coordinate activities as outlined in this RCP.

(c) Collect information concerning the discharge or release; its 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; and estimated cost for the response.

(d) Coordinate his/her efforts with other appropriate Federal, State, and local agencies and for consulting with and informing the RRT members of reported discharges and releases through Pollution Reports in Message Format (POLREPs; see Section D.2.F on POLREPs).

(e) Consult with the appropriate Regional or District office regarding situations potentially requiring temporary or permanent relocation. In the event of a declared Federal disaster, coordinate with the FEMA FCO as appropriate.

(f) Implement appropriate community relations activities;

(g) Appropriately address worker health and safety issues prior to and during a response operation;

(h) Coordinate with ATSDR, as the OSC deems necessary, regarding possible public health threats.

Within one year after completion of removal activities at a major discharge of oil, a major release of a hazardous substance, pollutant, or contaminant, or when requested by the RRT, the OSC/RPM shall submit to the RRT a complete report on the removal operation and the actions taken. The report shall follow the format specified in the NCP, Section 300.165(c).

8. STATE AND LOCAL AGENCY RESPONSIBILITIES

A. INTRODUCTION

The Governor of each State in Region V is requested to designate a lead agency and a representative to represent the State on the RRT. Each State representative may participate fully in all activities of the RRT. The State RRT representatives are expected to coordinate with the SERCs in their respective States in order to communicate and coordinate fully preparedness and pre-response planning activities between the State and the RRT. State and local government agencies are encouraged to coordinate the State contingency planning efforts for response to hazardous material events with this plan and with requirements of SARA Title III and OPA.

Because State and local public safety organizations are ordinarily 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 as stated in the NCP, and are responsible for directing evacuations pursuant to existing State or local procedures.

Following a specific incident, the State RRT representative shall ensure that the following actions are completed as appropriate:

(1) Notify downwind communities and downstream water users (municipal, industrial, and agricultural) of all discharges and releases that may threaten them;

(2) Notify and coordinate with State, county, and municipal agencies as appropriate, including State trustees for natural resources and the State emergency management system;

(3) Serve as liaison between State and Federal government;

(4) Be responsible, in conjunction with the OSC/RPM, for:

(a) Selection of disposal sites;

(b) Arranging for use of disposal sites;

(c) Selecting transport routes to disposal sites;

(d) Making arrangements with the State Emergency Management Agency to provide security for all on-scene forces and equipment. This activity includes establishing local liaison with hospital, emergency services, and police personnel, and in restricting entrance to hazardous areas to essential personnel;

(e) Assisting the OSC/RPM in determining and providing advice on the degree of hazard to public health and safety that is presented by the discharge or release;

(f) Assessing the environmental damage caused by the discharge or release;

(g) Assuming responsibility for operation and maintenance of a site to the degree consistent with its authority and resources, if necessary and when no responsible party has been identified; and

(h) Advising the OSC/RPM on the use of dispersants and other chemicals.

U.S. EPA shall ensure meaningful and substantial State involvement in hazardous substances response, and shall encourage States to enter into a U.S. EPA/State Superfund Memorandum of Agreement (SMOA) to increase State involvement and strengthen the U.S. EPA/State partnership. State involvement in hazardous substance response is discussed in Subpart F of the NCP and remains unchanged in this RCP.

Following are summaries of emergency preparedness measures for lead agencies and other State

agencies for each State in Region V. Additional information concerning each State's emergency procedures is provided in Annex 14.

B. STATE OF ILLINOIS

1. Emergency Preparedness For Oil Spills And Hazardous Materials Incidents

The Illinois Environmental protection Agency (IEPA) provides the designated RRT member for the State of Illinois. In order to prevent and abate environmental pollution, IEPA has various responsibilities for responding to environmental emergencies within the State or its adjoining waters. IEPA is the State's lead agency for developing plans and coordinating action before, during, and after certain emergency situations, including: emergencies involving waste management; emergencies involving public water supplies; spills of oil or hazardous materials upon waters or lands of the State; releases of harmful quantities of toxic substances to the atmosphere.

The Emergency Response Unit (ERU) of the Office of Chemical Safety has the responsibility within IEPA for coordinating the Agency's response and ensuring appropriate cleanup of any subsequent environmental contamination. The ERU collects information about these environmental emergencies and responds directly and/or notifies other divisions within IEPA of any needed action. Technical expertise is provided to first responders and public officials, addressing such issues as the physical, chemical, and toxicological characteristics of the materials involved; effective response and treatment actions; and precautions to be taken to prevent further injury or damage to public health or the environment.

2. Other Agencies' Responsibilities and Requirements

The Illinois Emergency Management Agency (IEMA) is the coordination and communications center for Illinois State agencies and is in overall command of emergency government efforts during major multi-jurisdictional disaster responses. IEMA is also the SERC designated pursuant to SARA Title III. Other State agencies have specific responsibilities to be the primary response agency as follows:

(a) Illinois Department of Nuclear Safety: incidents involving radioactivity, whether in transport or at nuclear power plants or other facilities.

(b) Illinois Department of Mines and Minerals: initial investigation of incidents involving crude oil and natural gas production sites, unless waters of the state are being impacted (then IEPA).

(c) Illinois State Fire Marshal: incidents involving underground storage tanks (USTs); this responsibility is shared with IEPA. Has the authority to require equipment inspection and testing.

(d) Illinois Commerce Commission: incidents involving railroad transport with respect to authority over the use, movement, and compliance of railroad equipment with U.S. DOT regulations.

(e) Illinois State Police: transportation incidents involving DOT Hazardous Materials, enforcement of DOT shipping regulations, traffic control, and security.

(f) Illinois Department of Conservation: assessment of natural resource damage in incidents involving serious environmental injury, such as fish kills and oiled waterfowl.

Other agencies serve a secondary role and provide technical support and resources as needed; however, they do not generally maintain an emergency response capability for on-scene response. These agencies are the Departments of Agriculture, Public Health, and Energy and Natural Resources; the Office of the Attorney General; and other human service agencies that might be involved with evacuees, should a prolonged incident occur requiring relocation of the general public.

C. STATE OF INDIANA

1. Emergency Preparedness For Oil Spills And Hazardous Materials Incidents

The Indiana Department of Environmental Management (IDEM) provides the designated member of the RRT for the State of Indiana and is the lead agency for the State in addressing spills, providing a 24-hour response capability. IDEM must provide technical assistance to the responsible party and the responding personnel and ensure compliance with the Indiana spill regulation and other pertinent State and Federal rules and regulations. Technical assistance takes the form of chemical identification, handling, and hazard information; evaluation of the threat to environmental and public safety; personal protection recommendations; containment and cleanup methods; and resource identification and location. On large spills, or where the spiller fails to respond adequately, IDEM staff respond on-site to assist in the response effort, assuming the role of OSC if necessary.

During a response, staff of the Emergency Response Section (ERS) of IDEM assume the role of technical advisors to the responsible party and provide on-scene assistance to that individual, as well as to those individuals or agencies involved in the response. On occasion, ERS staff has assumed a role that would appropriately be called that of an OSC. However, if a structure (e.g. Incident Command System) exists within a local or county jurisdiction that provides an OSC and that OSC is being utilized, ERS staff will stand ready to provide assistance to that OSC.

Once the immediate threat to the environment has been relieved, then the incident is further stabilized under ERS supervision. Rule 327 IAC 2-6 requires that a spiller is responsible for the containment, cleanup, and recovery of the lost material. Disposal of recovered material, which is classified as a waste, is referred by ERS staff to appropriate personnel in the Office of Solid and Hazardous Waste Management. ERS staff may then conduct a follow-up investigation to ensure that the material has been disposed of properly.

2. Other Agencies' Responsibilities and Requirements

The role of liaison between a spiller and the different program areas of IDEM is perhaps the greatest benefit that ERS can provide to those involved in a spill. This role can also extend to other State agencies, such as the Department of Natural Resources, the State Fire Marshal's Office, the State Emergency Management Agency, and the Indiana State Police.

The Governor's Task Force on Emergency Response Coordination has recognized that many State agencies will have roles to play and that coordination among those agencies will be critical. As a result, the Task Force has defined responsibilities and the lines of communication as part of preplanning efforts for emergencies.

D. STATE OF MICHIGAN

1. Emergency Preparedness for Oil Spills and Hazardous Materials Incidents

The Michigan Department of Natural Resources (MDNR) is the State of Michigan member of the RRT. MDNR provides technical liaison between State and Federal responders. If there is Federal involvement, the OSC and the Emergency Management Division, Department of State Police, jointly provide a coordinated response. For small or medium-sized spills, MDNR coordinates containment and cleanup activities with local government.

MDNR coordinates remedial activities necessary to provide protection to the environment. It monitors the party responsible for the release to ensure that timely and appropriate response is taken. If a responsible party is not identified or if the identified responsible party fails to take the appropriate actions in a timely manner, MDNR may initiate actions to contain and clean up the spill, under the authority of the Water Cleaning Emergency Fund, the Hazardous Waste Service Fund or the Michigan Environmental Response Act. Private contractors are generally hired to perform this service, with MDNR supervising the activity.

2. Other Agencies' Responsibilities and Requirements

(a) Department of State Police: The Department of State Police has primary responsibilities in responding to an incident, coordinating all preparedness, response, mitigation, and recovery activities. A Department of State Police representative functions as incident commander for State response. If the response requires the coordination of several State agencies, a State Command Post may be established by the Emergency Management Division, Department of State Police.

(b) Department Of Public Health: The Michigan Department of Public Health (MDPH) responds to incidents affecting public health. Incidents which are not of an immediate life-threatening nature but which require remedial action are typically coordinated by MDNR. However, the Council on Environmental Quality, located within MDPH, may provide oversight for such incidents.

2. Other Agencies' Responsibilities and Requirements

Resources of other State and local agencies may be available for emergency response, if requested by the Spills Team. These include staff and equipment of the Departments of Agriculture, Health, Natural Resources, Public Safety, and Transportation. The Division of Emergency Management of the Department of Public Safety coordinates the availability of state agency staff and equipment, and facilitates mobilization of these resources.

F. STATE OF OHIO

1. Emergency Preparedness for Oil Spills and Hazardous Materials Incidents

The Ohio Environmental Protection Agency (OEPA) is the designated representative of the Region V RRT for the State of Ohio. OEPA's offices house Ohio's spill response program, the focus of which lies with its Emergency Response Section, part of the Division of Emergency and Remedial Response. This Section has ten OSCs who investigate releases of oil and hazardous substances from both fixed and mobile facilities. Resource Conservation and Recovery Act (RCRA) and Spill Prevention Control and Countermeasures (SPCC) plans are submitted to this Section when appropriate. Two other sections make up this division: the Corrective Actions Section and the Special Investigation Section.

When a spill extends over a large area or may impact a drinking water supply, the Division of Water Quality and Planning and the Division of Public Drinking Water are called upon for assistance.

2. Other Agencies' Responsibilities and Requirements

Several different State agencies have areas of expertise to contribute during a spill, and in the case of such an event, operate under a cooperative agreement that outlines the activities of the signatory agencies when a spill occurs. These agencies are: the Ohio Emergency Management Agency, the State Fire Marshal, the Department of Highway Safety, the Public Utilities Commission, the Department of Transportation, the Department of Health, the Department of Agriculture, the Department of Natural Resources, and OEPA.

G. STATE OF WISCONSIN

1. Emergency Preparedness for Oil Spills and Hazardous Materials Incidents

The representative agency on the RRT for the State of Wisconsin is the Wisconsin Department of Natural Resources (WDNR). Wisconsin's emergency response program is led by WDNR's Emergency and Remedial Response Section, Bureau of Solid and Hazardous Waste Management. WDNR's Bureau of Law Enforcement provides field staff for the purpose of immediate response to hazardous substance discharges. Immediate responses are those on-site activities performed in the event of a release that has impacted or potentially could impact the air, land, or waters of the State.

The Emergency Management System is applied to incidents which require immediate action to protect the public health and environment. The designated departmental emergency management coordinator coordinates the department's overall response.

The following divisions of MDPH provide technical expertise at the scene or through the Emergency Operations Center and/or State Command Post:

(1) Environmental and Occupational Health;

(2) Health Facilities;

(3) Local Emergency Management Coordinator;

(4) Environmental Quality (Toxicological Resource Center); and

(5) Laboratory and Epidemiological Services.

E. STATE OF MINNESOTA

1. Emergency Preparedness - Oil Spills and Other Hazardous Materials Incidents

The Minnesota Pollution Control Agency (MPCA) provides the designated member of the Region V Response Team for the State of Minnesota. MPCA is the primary state responder to spills and emergencies involving hazardous materials (with the exception of incidents involving pesticides and fertilizers, which are under the jurisdiction of the Minnesota Department of Agriculture). All of the following information describing the emergency response therefore assumes MPCA actions for general hazardous materials incidents, but applies to the Department of Agriculture for all pesticide and fertilizer incidents.

MPCA's Spills and Abandoned Tanks Unit includes four full-time Spills Team members whose primary responsibility is to monitor the cleanup of spills and other emergency situations which pollute or threaten to pollute surface or ground water. By default, they also respond to reports of other environmental emergencies (e.g., air releases, illegal hazardous waste disposal, tire dump fires). In addition to receiving release reports, the Spills Team members perform field inspections at spill sites, provide technical assistance to responsible parties, and carry out enforcement actions for violation of State laws and rules.

If necessary, MPCA staff will proceed to the site to provide coordination and assistance in handling the emergency. This may include taking charge of the response if the responsible party is unknown or unavailable. In situations where public safety is the primary consideration, a Spills Team member does not take charge of the incident, but assists the fire chief or other public safety officials at the scene. This assistance may include emergency waiver or suspension of State laws and rules (e.g., allowing emergency waste discharges or the burning of a spilled product in order to minimize overall environmental damage).

Great Lakes Basin land and water resources through regional coordination, policy development, and advocacy.

GLC addresses a range of issues involving environmental protection, resource management, transportation, and economic development. A committee and task force structure, in which commissioners and advisors from all States participate, is the vehicle for identifying and developing issues, and for subsequent recommendation of the adoption of policies by the full membership. Federal and provincial observers participate but do not vote in GLC activities.

GLC is currently in the process of compiling a database inventory of spill response equipment and personnel throughout the Great Lakes States. The Commission was also instrumental in generating criteria for the siting of the Great Lakes Basin spill response center, one of the provisions of OPA.

C. INTERNATIONAL JOINT COMMISSION

The International Joint Commission (IJC) is a binational organization that was created under the Boundary Waters Treaty of 1909 to advise the governments of the United States and Canada on issues concerning water quality and quantity in the boundary waters between the two nations. The Commission consists of six members, three appointed by the President of the United States, and three appointed by the Prime Minister of Canada. IJC headquarters are located in Washington, DC, and Ottawa, Ontario, with an additional office in Windsor, Ontario, that is staffed by personnel from both the United States and Canada.

The Commission issues Orders of Approval in response to Applications for the use, obstruction, or diversion of waters that flow along, and in certain cases across, the boundary between the United States and Canada, if such uses affect the natural water levels or flows on the other side of the boundary. IJC also undertakes investigation of specific issues, or monitors specific situations, when requested by Governments. Implementation of Commission recommendations, or References, that are made as a result of such investigations, is at the discretion of the two Governments.

In practice, the membership of IJC acts as a single body seeking common solutions to problems and disputes, rather than as delegates representing separate national interests. Experts from both countries serve on technical boards for the Commission and carry out the necessary studies and field work of IJC investigations. Boards of Control, appointed by the Commission, report on compliance; study or advisory boards assist in the development of References. Public hearings and other opportunities for citizen input are organized when Applications and References are considered.

The Great Lakes Water Quality Agreement of 1972 (replaced in 1978 and amended in 1987) is a major focus of Commission activity. The Agreement expresses the commitment of the United States and Canada to restore and maintain the biological integrity of the ecosystem of the Great Lakes Basin. IJC monitors and assesses cleanup progress under the Agreement and advises Governments on matters related to the quality of the boundary waters of the Great Lakes system.

2. Other State Agencies' Responsibilities and Requirements

Chapter NR 158, Wisconsin Administrative Code, currently outlines the duties and responsibilities of other agencies. The Department of Military Affairs, Division of Emergency Government, coordinates receipt of spill notifications and facilitates coordination of resources for overall emergency management. (Note: Chapter 158 is being rescinded and incorporated into a new administrative code, the NR 700 series. It is projected that the new rule will be in effect by 1993.)

9. INTERREGIONAL AGENCIES

Several interregional agencies have been established that have interests within Region V and have roles in planning and response. The agencies vary considerably in their concerns and capabilities. Additionally, many regional planning commissions exist in Region V which maintain useful data and knowledgeable personnel. Following is a list of these interregional organizations. Addresses and telephone numbers, as well as further information concerning response procedures associated with several of these agencies, are provided in Annex 5.

A. BAY-LAKE REGIONAL PLANNING COMMISSION

The Bay-Lake Regional Planning Commission is composed of representatives from eight Wisconsin counties having shorelines on Lake Michigan and/or Green Bay: Brown, Door, Florence, Kewaunee, Manitowoc, Marinette, Oconto, and Sheboygan Counties. The Commission was established in 1972 to address area-wide transportation, land use, economic development, and natural resource issues, and to represent local interests in State and Federal planning program activities. Throughout its history, the Bay-Lake Regional Planning Commission has undertaken regional studies focusing on natural resources and numerous land- and water-related issues. The Commission also sponsors conferences and meetings to provide information relevant to local planning concerns.

The Wisconsin Coastal Management Program is one of the major programs in which the Commission participates. This program addresses such issues as low-cost waterfront construction projects, wetlands protection and preservation, shoreline protection, and waterfront development, including water quality concerns.

One Commission program, the Future of the Bay, is concerned with economic impacts on the Green Bay harbor and numerous issues related to the Remedial Action Plan (RAP) being implemented by WDNR. Under this program, the Commission has prepared base maps for the Green Bay RAP area, to be used to delineate natural resource-related information (e.g. floodplain/shoreline zoning, wetlands, fish habitat). Future of the Bay also participated in the Menominee River RAP initiated by WDNR, and assisted in the East River Priority Watershed project.

B. THE GREAT LAKES COMMISSION

The Great Lakes Commission (GLC) is an interstate compact commission comprised of gubernatorially appointed and legislatively mandated representatives of the eight Great Lakes States (Minnesota, Wisconsin, Illinois, Michigan, Indiana, Ohio, Pennsylvania, and New York). The Commission was formed to promote the informed use, development, and protection of

D. OHIO RIVER VALLEY WATER SANITATION COMMISSION

The Ohio River Valley Water Sanitation Commission (ORSANCO) is an interstate water pollution control agency established in 1948, with membership consisting of representatives from the eight states in the Ohio River Valley (Illinois, Indiana, Kentucky, New York, Ohio, Pennsylvania, Virginia, and West Virginia), and three representatives of the Federal government. The Commission is responsible for operating several programs: water quality monitoring of the Ohio River and its major tributaries; regulation of wastewater discharge to the Ohio River; and investigation of particular water pollution problems.

In addition, ORSANCO assists State environmental agencies, U.S. EPA, and USCG in emergency spill response. Specifically, in the event of a spill on the Ohio River or a major tributary, ORSANCO's role is 1) to serve as an interstate communications center, assisting in emergency notification procedures; and 2) to coordinate emergency stream monitoring. Annex 5 contains an excerpt from ORSANCO's spill response plan, "Ohio River Spill Response Procedures".

E. UPPER MISSISSIPPI RIVER BASIN ASSOCIATION

In order to prevent and/or adequately respond to spills on the Upper Mississippi River, representatives of the five States bordering the Upper Mississippi River and of four Federal agencies (U.S. EPA, USCG, USFWS, COE) meet periodically as members of the Upper Mississippi River Basin Association (UMRBA) to discuss common problems, propose solutions, reach agreements, and coordinate activities to respond to spills on the river. While prevention of spills is the primary goal of these State and Federal agencies, effective response to spills is an equally important and necessary goal. Realizing the importance of rapid notification and a coordinated response to spills on the Upper Mississippi River, the spill response agencies have jointly produced a plan and manual, the Upper Mississippi River Spill Response Plan and Resource Manual.

The manual functions as a working contingency plan, to be used as a supplement to the appropriate State emergency response plans, regional contingency plans, and the NCP. As such, the Upper Mississippi River Spill Response Plan and Resource Manual is consistent with the Region V and Region VII RCPs, and is in compliance with all requirements of the NCP.

The Response Plan sets out the procedures for notification of other State and Federal agencies responding to a spill in conjunction with existing plans. The Resource Manual provides reference information on the river, information concerning available spill containment equipment, sensitive human and wildlife resources, and potential sources of spills. An excerpt from this manual, "Interstate Notification Protocol for Spills to the Upper Mississippi River," is provided in Annex 5.

SECTION C: REGION V JURISDICTIONS

1. REGIONAL AREAS

Region V has been divided into two operational areas--inland and coastal--which correspond to the areas in which U.S. EPA and USCG are responsible respectively for providing OSCs. The coastal operational area consists of the open waters of the Great Lakes, including Lake St. Clair, the interconnecting rivers, major bays, ports, and harbors of the Region V States; the U.S. tributaries of the Great Lakes, to the extent that they are navigable by deep draft vessels; and the land surface, land substrata, ground water, and ambient air proximal to those waters. The inland operational area includes all other land territory of the six states of Region V, including each State's inland lakes and rivers.

Two Coast Guard Districts share Federal Region V. The Ninth Coast Guard District, headquartered in Cleveland, serves the Great Lakes drainage basin. The Second Coast Guard District, headquartered in St. Louis, serves the drainage basins of the upper Mississippi and the Ohio Rivers.

The response postures of the Ninth and Second Coast Guard Districts are different. Within the Great Lakes coastal zone, the appropriate Captain of the Port (COTP) functions as the predesignated OSC for all oil and hazardous substance releases, subject to a DOT/U.S. EPA redelegation of certain CERCLA response authorities (see Annex 13 for the text of the Instrument of Redelegation). The Instrument of Redelegation specifies that U.S. EPA, not the Coast Guard, will perform the following two categories of response actions within the coastal zone: 1) remedial actions for releases originating from facilities, and 2) all response actions for releases originating from hazardous waste management facilities. Regarding the latter, the Instrument of Redelegation does provide for emergency action by the Coast Guard pending arrival of a U.S. EPA OSC.

The scope of the Second Coast Guard District response role is defined by an MOU between that District and U.S. EPA Region V. Consistent with the MOU, the appropriate COTP serves as the predesignated OSC for certain categories of oil and hazardous substance releases occurring within specified ports and harbors of the inland river system, as described in Subsection 4 below. Those categories of releases include discharges of oil and hazardous substances which result from a vessel casualty or vessel-transfer activity. A COTP will respond for investigative purposes to those vessel casualty incidents which are outside the limits of the specified ports and harbors. In such instances, if a hazardous substance is involved, he/she will act, at the request of U.S. EPA, as the First Federal Official On-scene, pending the arrival of the U.S. EPA-provided OSC. The USCG First Federal Official On-scene will coordinate all activities with the U.S. EPA OSC, in accordance with the NCP, 40 CFR 300.135(b). In these cases, U.S. EPA will remain the lead agency and the U.S. EPA OSC will retain the responsibility for response actions, including the responsibility for authorizing Federal fund-financed actions. Within specified ports and harbors, U.S. EPA Region V will furnish the OSC for those releases which occur at industrial facilities, from non-marine transportation casualties, at bulk storage facilities, and at hazardous substance waste sites.

DOD or DOE shall provide OSCs for all response actions for releases of hazardous substances, pollutants, or contaminants which originate on any facility or vessel under the jurisdiction, custody, or control of DOD or DOE. In the case of a Federal agency other than U.S. EPA, USCG, DOD, or DOE, such agency shall provide OSCs for all removal actions necessitated by releases originating on any facility or vessel under its jurisdiction that are not emergencies.

U.S. EPA or USCG OSCs may be requested to provide technical assistance to the lead agency OSC who is responding to the release or threatened release. In the event of an emergency on Federal agency property, other than DOD or DOE, U.S. EPA or USCG retains response authority and U.S. EPA OSCs may respond and later initiate cost recovery actions against the potentially responsible party (PRP).

Definitions of the boundaries of OSC jurisdictions for Region V are provided in the following subsections. Where highways are used to delineate the boundary, the roadbed right-of-ways of the highway are included in the inland (U.S. EPA) zone.

2. UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OSC BOUNDARIES

A. U.S. EPA REGION III OSC BOUNDARIES

U.S. EPA Region III will provide OSCs for investigating and responding to releases to the main stem of the Ohio River from the Ohio-Pennsylvania boundary, mile 40.1, to the Kentucky-West Virginia boundary, mile 317.2. All releases in the above-named stretch of the Ohio River emanating from sources in West Virginia will be handled by U.S. EPA Region III personnel; those from sources in Region V will be handled by personnel from Region V.

If either RRT is activated, the Second USCG District would be involved along the entire stretch of the Ohio River.

B. U.S. EPA REGION IV OSC BOUNDARIES

U.S. EPA Region IV will provide OSCs for investigating and responding to releases of oil or hazardous materials to the main stem of the Ohio River from the Kentucky-West Virginia boundary, mile 317.2, to its junction with the Mississippi River, mile 981.2. Releases in the above-named stretch of the Ohio River emanating from shoreline sources in Kentucky will be handled by personnel of Region IV; those spills from shoreline sources in Ohio, Indiana, and Illinois will be handled by personnel from Region V. Region IV will have the responsibility for ensuring notification of water users downstream of the location of the release, including coordination with ORSANCO, when a release occurs on the south shoreline or in the main stream of the Ohio River; Region V has a like responsibility, including coordination with ORSANCO, when a release occurs on the north shoreline of the river.

C. U.S. EPA REGION VII OSC BOUNDARIES

U.S. EPA Region VII will provide OSCs for investigating and responding to releases to the main stem of the Upper Mississippi River (UMR) when either Iowa or Missouri is the principal first responding State. U.S. EPA Region V will have jurisdiction for such releases totally within the State of Minnesota and where Minnesota, Wisconsin, or Illinois is the first principal responding State. When releases to the UMR main stem will result in significant response by more than one State, or when there is uncertainty as to the responding States,

Region VII will provide OSCs for such releases occurring between Cairo, Illinois, and Keokuk, Iowa (miles 0.0 to 354.5), and Region V above that point.

Per U.S. EPA/USCG MOUs, USCG provides the predesignated Federal OSC for waterborne releases occurring in the St. Louis, Missouri, metropolitan area (river miles 168.8 to 202.9) and around Cairo, Illinois (miles 0.0 to 13.0). This area includes the Missouri River from mile 0.0 to mile 8.2.

For spills from shore facilities and non-waterborne sources, OSCs will be provided by the Region in which the source is located.

D. **U.S. EPA REGION VIII OSC BOUNDARIES**

U.S. EPA Region V will provide OSCs for investigating and responding to releases to the main stem of the Red River of the North from its origin in Lake Traverse near Browns Valley, Minnesota, to the Canadian border. All spills to the above-named stretch of the Red River emanating from sources in North Dakota and South Dakota will be handled by Region VIII personnel.

South of the Browns Valley area, the boundary between South Dakota and Minnesota involves the headwaters of the Minnesota River flowing southward. Region V Spill Response personnel will respond to releases to the main stem of the Little Minnesota River and Big Stone Lake southward to Ortonville, Minnesota. All releases to the above-named headwaters of the Minnesota River emanating from sources in South Dakota will be handled by Region VIII personnel; releases from sources in Minnesota will be handled by Region V personnel.

The middle of the Red River of the North northward from latitude 46 degrees 20 minutes (near Breckenridge, Minnesota) is the dividing line between USCG District Nine to the east and the Second USCG District to the west. Southward from latitude 46 degrees 20 minutes, the Red River of the North and the headwaters of the Minnesota River are entirely within USCG District Two territory. If an incident-specific RRT is activated, the above-mentioned USCG territorial boundaries apply to the designation of the OSC.

Region VIII will provide communications as necessary with the Canadian Province of Manitoba concerning all releases occurring in waters flowing into Canada, including those emanating from Region V.

Releases from an unknown source will be treated as main stem releases until the source is identified.

3. **NINTH COAST GUARD DISTRICT OSC BOUNDARIES**

Eight USCG units provide OSCs for releases occurring within the coastal zone, each serving a specific geographic area. These geographic areas are defined by the international boundary with Canada, the boundaries between the units (described at 33 CFR 3.45), and the boundary between the inland zone and the coastal zone. In most locations, the boundary between inland and coastal zones follows the near shore areas adjoining the Lakes and the interconnecting rivers. The following subsections detail,

for each of the eight units, which tributaries fall within the coastal zone and where a geographic feature, such as a highway, serves as the boundary.

A. **MARINE SAFETY OFFICE, CHICAGO, ILLINOIS**

Buffington Harbor (Gary, Indiana): Entire harbor.

Burns Harbor (Burns Harbor, Indiana): Entire harbor.

Calumet Harbor and River (Chicago, Illinois): From the mouth of the Calumet River south to the north side of O'Brien Lock and Dam, including the waters inside the lock gates.

Chicago River (Chicago, Illinois): Upstream to the navigation lock.

Gary Harbor (Gary, Indiana): Entire harbor.

Indiana Harbor (East Chicago, Indiana): Upstream to Conrail Railroad Bridge.

B. **MARINE SAFETY OFFICE, CLEVELAND, OHIO**

Ashtabula River (Ashtabula, Ohio): Upstream to East 5th Street.

Black River (Lorain, Ohio): Upstream to the turning basin at the National Tube Division of U.S. Steel (mile 3).

Conneaut River (Conneaut, Ohio): Upstream to the Bessemer and Lake Erie Railroad Swing Bridge at the Pittsburgh and Conneaut Dock Company (mile 0.75).

Cuyahoga River (Cleveland, Ohio): Upstream to the mouth of Big Creek in the Metropolitan Parks (mile 7.5).

Grand River (Fairport Harbor, Ohio): Upstream to the turning basin at Osborn Concrete and Tank Company.

C. **MARINE SAFETY OFFICE, DETROIT, MICHIGAN**

The coastal zone of Lake Huron and Lake Erie from Sturgeon Point in Lake Huron, Michigan, to the Detroit River Light in Lake Erie, including Saginaw Bay, with the inland boundary being Route I-75 from the southern limit of the Detroit OSC area to the junction of Routes I-75 and I-94 in Detroit, then Route I-94 north to Port Huron, Michigan, then Route M-25 northward from Port Huron through Bay City, Michigan, to the junction of Routes M-25 and I-75 north to the junction of Routes I-75 and M-23 near Standish, Michigan, then M-23 north to northern limit of the OSC area.

D. **MARINE SAFETY OFFICE, DULUTH, MINNESOTA**

St. Louis River (Duluth, Minnesota): That portion of the river extending north of latitude 46 degrees 43 minutes North to Lake Superior.

E. CAPTAIN OF THE PORT, GRAND HAVEN, MICHIGAN

The coastal zone includes the navigable waters and tributaries of Lake Michigan that are on the lakeward side of a line drawn by the following connecting roads: I-94 near Portage, Indiana north to U.S. 31; then, following U.S. 31, north to the junction with Highway 22; and then along Highway 22 to northern end of the OSC area near Leland, Michigan. The waters of Lake Manister are also included in the coastal zone.

F. MARINE SAFETY OFFICE, MILWAUKEE, WISCONSIN

Ahnapee River (Algoma, Wisconsin): Upstream to the 2nd Street Bridge.

East River (Green Bay, Wisconsin): Upstream to the Monroe Street Bridge.

East Twin River (Two Rivers, Wisconsin): Upstream to 22nd Street Bridge.

Fox River (De Pere, Wisconsin): Upstream to Lock and Dam #1.

Kewaunee River (Kewaunee, Wisconsin): Upstream to the Park Street Bridge.

Kinnickinnic River (Milwaukee, Wisconsin): Upstream to Becher Street.

Manitowoc River (Manitowoc, Wisconsin): Upstream to the C & NWW Bridge.

Menominee River (Marinette, Wisconsin - Menominee, Michigan): Upstream to the Dunlap Avenue (Highway 41) Bridge.

Menomonee River (Milwaukee, Wisconsin): Upstream to the 25th Street Bridge (mile 2.0).

Milwaukee River (Milwaukee, Wisconsin): Upstream to the North Humboldt Avenue Bridge.

Oak Creek (South Milwaukee, Wisconsin): Mouth of Oak Creek.

Oconto River (Oconto, Wisconsin): Upstream to the turning basin.

Pike Creek (Kenosha, Wisconsin): Upstream to the Sixth Avenue Bridge.

Root River (Racine, Wisconsin): Upstream to the Fourth Street Bridge.

Sauk Creek (Port Washington, Wisconsin): Upstream to the Wisconsin Street Bridge.

Sheboygan River (Sheboygan, Wisconsin): Upstream to the Pennsylvania Avenue Bridge.

West Twin River (Twin Rivers, Wisconsin): Upstream to the 16th and Madison Streets Bridge.

G. **CAPTAIN OF THE PORT, SAULT SAINTE MARIE, MICHIGAN**

Charlevoix, Michigan Area: Pine River, Round Lake, and the waters of Lake Charlevoix to the west bridge on the Boyne River, and the South Arm to the State Route 32 bridge in East Jordan.

Cheboygan River (Cheboygan, Michigan): Upstream to the dam and lock at Charmin Paper Company.

Thunder Bay River (Alpena, Michigan): Upstream to the turning basin adjacent to Fletcher Paper Company.

Manistique River (Manistique, Michigan): Upstream to the dam immediately north of State Route 2.

H. **MARINE SAFETY OFFICE, TOLEDO, OHIO**

Coastal zones of Lake Erie. The line of demarcation between inland and coastal areas follows Interstate 75, commencing just north of Monroe, Michigan, south across the Maumee River, Toledo, Ohio, to the intersection of Ohio State Route 65, then north to Ohio State Route 2, thence following that route through Port Clinton, Sandusky, and across the Huron River, Huron, Ohio. The roadbed right-of-ways of highways serving as boundaries are included in the inland zone.

I. **NINTH COAST GUARD DISTRICT RESPONSES IN THE INLAND ZONE**

Ordinarily, the Ninth Coast Guard District will not provide the OSC for a release occurring in the inland zone. However, where a Marine Safety Officer responds in the inland zone to a marine casualty or other incident pursuant to USCG port safety and commercial vessel safety responsibilities, that officer will serve as the First Federal Official On Scene, pending arrival of the predesignated U.S. EPA OSC. In this capacity, that officer will manage any cleanup actions performed by the responsible party and, if necessary, will initiate a Federal removal.

The U.S. EPA Region V office may always request that the Ninth Coast Guard District provide the OSC for a release in the inland zone, regardless of source, because of the particular circumstances of the incident.

4. **SECOND COAST GUARD DISTRICT OSC BOUNDARIES**

As stated in the MOU between U.S. EPA Region V and USCG, the Second Coast Guard District is predesignated to provide the OSC for investigating and responding to all discharges of oil and hazardous substances which result from a vessel casualty or transfer-related activity in the ports and harbors of the inland river system specified below.

A. **PORT OF ST. LOUIS, MISSOURI**

The USCG Captain of the Port, St. Louis, Missouri, shall serve as the predesignated OSC for all discharges of oil and hazardous substances which result from a vessel casualty or vessel-transfer activity which occur on the UMR between mile 168.8 and mile 202.9.

B. **PORT OF PADUCAH, KENTUCKY**

The USCG Captain of the Port, Paducah, Kentucky, shall serve as the predesignated for all discharges of oil and hazardous substances which result from a vessel casualty or vessel-transfer activity which occur in the following areas:

(1) the UMR between mile 0.0 and mile 13.0;

(2) the Ohio River between mile 974.0 and mile 981.0; and

(3) the Ohio River between mile 919.0 and mile 944.0.

C. **PORT OF LOUISVILLE, KENTUCKY**

The USCG Captain of the Port, Louisville, Kentucky, shall serve as the predesignated OSC for all discharges which result from a vessel casualty or vessel-transfer activity which occur on the Ohio River between mile 592.0 and mile 630.0; and between mile 461.9 and mile 491.7; and the Licking River between mile 0.0 and mile 5.0.

D. **PORT OF HUNTINGTON, WEST VIRGINIA**

The USCG Captain of the Port, Huntington, West Virginia, shall serve as the predesignated OSC for all discharges of oil and hazardous substances which result from a vessel casualty or vessel-transfer activity which occur on the Ohio River between mile 303.0 and mile 323.0.

SECTION D: RESPONSE OPERATIONS

1. INCIDENT COMMAND PROTOCOL

Current Federal law requires implementation of a site-specific incident command system at all emergencies involving hazardous substances by the senior emergency response official responding (29 CFR 1910.120 and 40 CFR 311). The specific regulatory language suggests a seniority hierarchy increasing from local, to State, to Federal. Yet often it makes more sense for senior local or State officials to command because they have committed, effectively command, and are most familiar with the resources immediately available. Flexibility was the basis of past practice and has worked well. At the same time, it must be recognized that Federal and State responders are charged by law with specific authorities and responsibilities in certain emergency situations that cannot be subsumed. This protocol does not commit any parties adopting it to do anything not already required by federal law.

An incident command system (ICS) shall be established at all incidents involving hazardous substances by the senior on-scene official of the first response organization to arrive at an incident. The ICS should be based on the organization, terminology, and procedures recommended by the National Fire Academy[1] and applied in a broad sense to include all hazard control and mitigation response organizations, including responsible parties, private responders, and local, State, and Federal agencies. All such entities participating in a response are required by Federal law to implement an intra-organizational ICS and integrate it with the overall ICS (29 CFR 1910.120 or 40 CFR 311).

The ICS established will have as the Incident Commander (IC) the most senior on-scene official with the expertise, capability, and determination to be the commander. The IC can be from a local unit of government or from a county, State, or Federal agency, as long as he/she has the expertise, capability, determination, and authority. This protocol recognizes that typically, but not necessarily, the IC will change as the incident progresses from being primarily a public safety problem, with the local fire chief as IC, to an environmental incident with a State or Federal person as the IC. The following procedures specify a determinate yet flexible means of establishing the role of Federal and State responders in an ICS.

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[1] One set of common terminology and procedures is vital to the efficient functioning of an ICS in an emergency. While no widely accepted ICS is specifically designed for hazardous materials response, the National Fire Academy (NFA) system is workable, widely accepted, and recommended by FEMA. The NFA ICS is being designated as the preferred ICS system for purposes of this protocol until a more workable and widely accepted system is available.

A. **SINGLE JURISDICTIONAL AREA AFFECTED**

When the incident involves and affects only a single geographical jurisdiction, the organizational structure of the ICS will be determined by the established local contingency plan. This may involve single or multiple agency involvement. In all situations, one person shall act as either an IC in sole charge, or when functioning as an Operations Chief to implement the action plan of a Unified Command.

In such instances, responding State and Federal officials, who might otherwise be considered the senior competent emergency response official at the site, shall either:

1. Identify themselves to the IC and integrate themselves into the established ICS per the IC's direction, usually as a technical specialist to an operations group supervisor or as an operations group supervisor; or

2. Join an existing Unified Command or request the IC to establish a Unified Command; or

3. Assume the Incident Command role when required by Federal or State law, or when an existing IC agrees to such a transition, or when no ICS has been established.

The ICS transfer of command or initial assumption of command protocols shall be used.

B. **MULTIPLE JURISDICTIONAL AREAS AFFECTED**

When the incident involves and affects multiple local geographical jurisdictions or areas not covered by local emergency response organizations, the State of Federal competent senior official at the site shall either:

1. Preferably join an existing Incident Command or Unified Command as in A (above); or

2. Establish a Unified Command for an encompassing ICS if none exists; or

3. Assume Incident Command and establish an ICS incorporating existing local efforts as operations section branches or otherwise appropriate.

C. **LOCAL, STATE, FEDERAL INTERACTION**

When not specifically prescribed, a Unified Command consisting of local, State, and Federal senior competent emergency response officials at the site shall be the preferred approach to integrating several levels of government into an ICS. Where State law specifies incident command assignment, it shall take precedence over this protocol with respect to those State and local organizations to which it applies. Federal jurisdiction specified in CERCLA, OPA, or other section of the RCP shall take precedence over this protocol.

D. SENIORITY

Seniority, as discussed in 29 CFR 1910.120(q)(3)(i),[2] is ranked according to competency and breadth of responsibility, for purposes of this plan.

Competency will be determined by meeting the requirements of 29 CFR 1910.120 (q)(6)(v).[3] All officials meeting the competency criteria are senior to those who do not, unless specifically charged with overriding authority applicable to the specific incident situation by State or Federal law.

Breadth of responsibility will be considered to increase from most local to State to Federal. However, this protocol encourages the establishment of the ICS at the most local level practicable to assure the earliest implementation of a unified response strategy.

E. POST EMERGENCY OPERATIONS

This protocol is intended to apply only during the emergency phase of a response to which 29 CFR 1910.120(q) applies. However, use of an incident command system throughout a response and cleanup is encouraged.

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[2] 29 CFR 1910.120 (q)(3)(i): "The senior emergency response official responding to an emergency shall become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the individual in charge of the ICS assisted by the senior official present for each employer.

NOTE to (q)(3)(i).--"The 'senior official' at an emergency response is the most senior official on the site who has the responsibility for controlling the operations at the site. Initially it is the senior officer on the first-due piece of responding emergency apparatus to arrive on the scene. As more senior officials, arrive (e.g. battalion chief, fire chief, State law enforcement official, site coordinator, etc.), the position is passed up the line of authority which has been previously established."

[3] 29 CFR 1910.120 (q)(6)(v): "On-scene incident commander. Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder awareness level and in addition have competency in the following areas and the employer shall so certify:

(a) Know and be able to implement the employer's incident response system.
(b) Know how to implement the employer's incident response system.
(c) Know and understand the hazards and risks associated with employees working in chemical protective clothing.
(d) Know how to implement the local emergency response plan.
(e) Know of the State emergency response plan and of the Federal Regional Response Team.
(f) Know and understand the importance of decontamination procedures."

2. COMMUNICATIONS

A. GENERAL PROCEDURES

It is the spiller's responsibility to report all spills. If U.S. EPA or USCG is the first to be notified of a release or discharge, U.S. EPA or USCG will notify, as appropriate, the State and the NRC, the appropriate trustees for natural resources, and other RRT members, as stated in Subsection D.2.B of this plan. If the State or other agency is the first to be notified, they shall notify the NRC. See Annex 5 for information concerning notification plans developed by ORSANCO and UMRBA for coordination of responses to spills on the Ohio River and the Upper Mississippi River, respectively.

Any person may undertake a response action to reduce or eliminate a release of a hazardous substance, pollutant, or contaminant. Such participation in response action by persons other than the first Federal official is discussed in the NCP, Subpart H, and remains unchanged in this RCP.

B. CLASSIFICATION OF OIL RELEASES

1. **Classification of minor oil spills:** For minor oil spills (those under 5,000 gallons) the OSC will, if circumstances warrant, send (via FAX, E-Mail, or other means) incident notification reports or POLREPs to the appropriate Regional Response Center (RRC), the appropriate State(s), and appropriate Federal and State natural resources trustees. These reports will be reviewed by the RRT Co-Chairs or their designees, who will notify other Federal and State RRT members, if circumstances warrant. (Note: Very small spills, i.e. less than 100 gallons, will usually not require action or notification of RRT Co-Chairs.)

2. **Classification of medium oil spills:** Actual or potential medium oil spills (those between 1,000 and 10,000 gallons), will be treated the same as minor spills except when response requirements exceed the capabilities of the OSCs and local contractors, or when there is a likelihood of strong public or political interest in the response, or of major environmental damage. Under these circumstances, the required notifications for a major spill will be initiated.

3. **Classification of major oil spills:** Upon first learning of an actual or potential major oil spill situation (in excess of 10,000 gallons), the OSC shall immediately notify the RRC by the most rapid means available. The OSC shall provide the RRC with all known information, even if it has not been confirmed by personnel on-scene. Upon notification, the RRT Co-Chair(s) will automatically activate the RRT for information purposes. RRT activation will be by telephone, followed by RRC POLREPs.

C. CLASSIFICATION OF HAZARDOUS SUBSTANCES RELEASES

1. **Classification of minor hazardous substances releases:** For minor releases, those in an amount of less than the reportable quantity (RQ, established in 40 CFR 300 and 355) that poses minimal threat to human health or welfare or the environment, the OSC will, if circumstances warrant, send routine (in lieu of Priority) incident notification reports or POLREP message reports to the RRC and appropriate trustees

for natural resources. These reports will be reviewed by the RRT Co-Chairs or their designees, who will notify other Federal and State RRT members if circumstances warrant.

2. **Classification of medium hazardous substances releases:** Actual or potential medium releases (those amounts exceeding the RQ which do not meet the criteria for classification as a minor or major release) will be treated the same as minor spills, except when response requirements exceed the capabilities of the OSC and local contractors, or when there is a likelihood of strong public or political interest in the response. Under these circumstances the required notifications for a major spill will be initiated.

3. **Classification of major hazardous substances releases:** Upon first learning of an actual or potential major hazardous substance release in an amount that poses a substantial threat to human health, welfare, or the environment, or results in significant public concern, the OSC shall immediately notify the RRC by the most rapid means available. The OSC shall provide the RRC with all known information, even if it has not been confirmed by on-scene personnel.

   Upon notification of an actual or potential major hazardous substance release, the RRT Co-Chairs will automatically activate the RRT for information purposes. RRT activation will be by telephone, followed by RRC POLREPs.

D. OSC NOTIFICATION RESPONSIBILITIES

As used in this section, "notification" refers to the actions taken by the pre-designated Federal OSC to immediately alert appropriate Federal and State agencies of a release. The purpose of this notification is to allow the notified agency an opportunity to perform some on-scene program function, not to provide a report on the OSC's operation. Ordinarily, the OSC will notify agencies by telephone. Annex 1 lists the 24-hour telephone numbers of RRT members.

1. **Minor Releases:** The OSC will notify the State pollution response agency and, unless the release is confined to an urban or industrial location, the USFWS field office specified in Annex 6 for the geographic area affected.

2. **Medium and Major Releases:** The OSC will notify his agency's RRT representative, the State pollution response agency, and, unless the release is confined to an urban or industrial location, the DOI RRT representative. (The DOI RRT representative will relay the information to the appropriate USFWS office.)

3. **Special Cases:**

   (a) State Natural Resource Trustee: The State pollution response agency notified of a release by the OSC will in turn alert the State natural resource trustee.

   (b) Federal Land Manager: When a release impacts Federal property, such as a National Forest, the OSC will notify the local office of the managing agency. If he/she is unable to promptly make this notification, he/she will alert the RRT representative for the managing agency.

(c) National Response Center (NRC): OSCs are not required to notify the NRC of releases. However, in that very rare circumstance where an OSC receives a report from the responsible party and the responsible party is unable to contact the NRC, the OSC will relay the report to the NRC. USCG OSCs may accomplish this by entering the NRC Port Code in the notify slot which follows the MPIR screen of the MSIS Marine Pollution Product Set.

(d) Upper Mississippi River: Under the 1990 Notification Protocol adopted by the UMRBA, a State that is "first aware" of a release notifies the Federal OSC and other States in the Basin, as appropriate. Should the Federal OSC be the Association member "first aware" of a release, he/she notifies the State in which the release has occurred or the State presently being impacted. That State then assumes the responsibility for alerting other States in the Basin in accordance with the Protocol. Annex 5 provides the Notification Protocol.

(e) Ohio River: ORSANCO's Emergency Response Resource Manual includes a spill notification plan for use by ORSANCO and by State and Federal agencies. The ORSANCO plan's spill response procedures, provided in Annex 5 of this document, apply to spills into the Ohio River and its tributaries. It specifies that U.S. EPA, State water pollution control agencies, USCG, and ORSANCO will notify each other of spills, but allows for ORSANCO to assist in notifying the appropriate agencies of "adjacent and downstream States". Under the plan, the State water supply agencies carry the responsibility for alerting water users.

(f) Local Notifications: Subsection G.3, "Planning--Local Level," discusses the appropriate role of the Federal OSC in notifying members of the local community (emergency government, water users, etc.) of a release.

E. ACTIVATION OF THE RRT

The incident-specific RRT may be activated by any member agency when a discharge or release:

(1) Exceeds the response capabilities available to the OSC in the place where it occurs;

(2) Transects State, Regional and/or international boundaries;

(3) Poses a substantial threat to public health, welfare, or to the environment, or to Regionally significant amounts of property.

The Co-Chair will activate the RRT during any discharge or release upon request from the OSC or from any RRT representative to the Chair. Requests for RRT activation shall subsequently be confirmed in writing. Local requests for RRT activation must be made through the State RRT member.

During a prolonged removal action, activation of the RRT may be unnecessary or it may be activated in only a limited sense, or have available only those members who are affected or can provide direct response assistance. When the RRT is activated, affected States may

participate in all RRT deliberations. When the RRT is assembled, the RRT shall meet at a time and location specified by the Chair.

Levels of activation are listed below. Activation may occur by phone or by assembly.

Alert: Notification of RRT members that an incident has occurred.

Standby: Notice to some or all RRT members that their services may be needed and that they are to assume a readiness posture and await further instructions. Notice may be given by phone.

Partial: Notice to selected RRT members that their services are required in response to a pollution incident. The activation notice will specify the services requested and the services that will be required. Although the services of only selected members are being requested, partial activation will be documented in a POLREP which will be distributed to all RRT members. The initial activation notice may be provided by telephone, but will be confirmed in writing.

Full: Notice to all RRT members (with the exception of representatives of non-affected States) that their services are requested in response to a pollution incident. The activation notice will specify the services being requested from each RRT member. The services of some members may be limited to advising the OSC on general matters. The initial activation notice may be provided by telephone, but shall be confirmed in writing.

The RRT can be deactivated by the Chair, when the Chair determines that the OSC no longer requires RRT assistance. The time of deactivation shall be included in a POLREP.

F. OSC POLLUTION REPORT MESSAGES (POLREPS)

Except as noted below, the designated OSC prepares POLREPs for each releases, or potential release, occurring within the OSC's area of responsibility. The OSC submits POLREPs to the appropriate RRC as significant developments occur. For medium and major releases, these submittals will occur on a daily basis until, in the judgment of the OSC, the response operation and the impact of the release have stabilized.

(1) Distribution

Minor Releases: A USCG OSC will submit POLREPs to the appropriate RRC and include the pollution response agency of the impacted State or States as an information addressee. There is one limited exception to this rule. Where the incident is of short duration, a Federal removal has not been conducted, and there are no aggravating circumstances, the OSC may forgo preparation of a discrete POLREP; the Marine Pollution Incident Report (MPIR) will suffice. If the State wishes a copy of the POLREP, the OSC may provide a copy of the MPIR. Ordinarily, U.S. EPA does not prepare POLREPs for minor releases.

Medium and Major Releases: The OSC will submit POLREPs to the RRC with the following to be included as information addresses:

(a) The NRC;

(b) The pollution response agency for the impacted State or States;

(c) The DOI RRT representative, unless the release is confined to an urban or industrial area;

(d) The HHS representative, if the pollutant is a hazardous chemical;

(e) The national program manager of the lead agency-COMDT (G-MEP) or the Emergency response Division, U.S. EPA Headquarters;

(f) In the case of a USCG response, Commander, Atlantic Area (AOP); and

(g) The DOC representative in the case of a release or threat of a release to the surface waters of the United States.

(2) Special Cases

(a) Fund Manager: When a USCG or U.S. EPA OSC initiates a Federal removal, the OSC will include the representative of the fund manager in the distribution of POLREPs. For oil cleanups conducted by U.S. EPA OSCs, the fund manager representative is the Marine Safety Division of the USCG district in which the spill has occurred. For CERCLA-funded hazardous substance removals conducted by a USCG OSC, the fund manager representative is the Director, Emergency Response Division, U.S. EPA Headquarters. In such cases, USCG OSCs will also include COMDT (G-MEP) as an information addressee. Regardless of which fund is used, the CERCLA Response Trust Fund or the Revolving Fund, a USCG OSC conducting a Federal removal will include the Commander, Maintenance and Logistics Command Atlantic (fcp) in the distribution of POLREPs.

(b) Worker Safety: If the pollutant is a hazardous substance and Federal or private sector personnel are participating in a "hands-on" removal, the OSC will include the Department of Labor RRT representative in the distribution of POLREPs. (Note: this provision does not extend to the activities of State and local government employees.)

(c) Federal Land Manager: Consistent with the spill notification guidelines, when a release impacts Federal lands, the OSC will include the RRT representative of the managing agency in the distribution of POLREPs.

(d) Intrastate Distribution: The State office designated to receive POLREPs from Federal OSCs will perform any further distribution to other elements of State government within that State.

(3) Means of Transmission

Facsimile machine (FAX) is the standard method of transmitting messages between member agencies of the Region V RRT. However, individual agencies and a lead

agency may agree to use any other means of communication (e.g., EPA E-Mail, AUTODIN, TELEX). It is incumbent upon each agency to identify a reliable, 24-hour means of receiving POLREPs. Where this has not been done, distribution will be by regular mail. Annex 1 provides communication information (including RRT FAX numbers), for RRT members, OSCs, and other government entities that routinely participate in Federal response activities in Region V.

Where an incident generates substantial interest in the response community and the lead agency experiences a demand for POLREPs beyond the normal RRT distribution, the lead agency may elect to post POLREPs on a commonly accessible computer bulletin board in lieu of direct transmission to individual offices. In such an event, the Ninth Coast Guard District will employ the NOAA RRT System discussed in Subsection D.2.H (below).

(4) **Format**

Both USCG and U.S. EPA OSCs employ the basic situation report (SITREP) format, stating the present situation, the actions that have been taken since the previous message, and the local response team's proposed course of action. USCG agency guidance regarding POLREP format may be found in Volume VI of the Marine Safety Manual, at subparagraph 7.B.6.(1).

(5) **Preparation**

For continuing, serious incidents, OSCs should endeavor to submit POLREPs by 1400 hours. State and Federal agency representatives directly supporting the local response effort should supply the OSC with updates on their activities by 1200 hours.

In those instances where a possible public health emergency exists, the OSC should notify the HHS representative to the RRT. Throughout the response actions, the OSC may call upon the HHS and/or the ATSDR representative for assistance in determining public health threats, and call upon OSHA and HHS for advice concerning worker health and safety concerns.

As discussed in Subsection D.2.D (above), the OSC/RPM shall promptly notify those trustees for natural resources of any discharges or releases that are injuring or may injure natural resources that are under their management, jurisdiction, or responsibility. (See Annex 4 for list of current natural resource trustees, and Subsection D.9.A of this plan for designation of jurisdictions of natural resource trustees.) The OSC should notify DOI's Bureau of Indian Affairs of any discharges or releases so that they may determine whether Indian lands and/or treaty areas are affected. (See Subsection D.6.E for information on Native American Lands, and Annex 3 for BIA contacts. Expanded guidance on proper notification to Tribes and Tribal trustees will be developed.) The OSC or RPM shall seek to coordinate all response activities with the natural resource trustees (ref NCP 300.135 j). Where the OSC/RPM becomes aware that a discharge or release may affect endangered or threatened species or their habitat, the OSC/RPM should consult with DOI or DOC (NOAA).

G. COMPUTER BULLETIN BOARDS

(1) NOAA RRT System

The NOAA Hazardous Materials Response Branch in Seattle, Washington, has created a system of bulletin boards for use by RRTs and OSCs during responses to major pollution incidents. One bulletin board is assigned to each RRT. The RRT bulletin board system resides on the same Prime computer that supports NOAA E-MAIL. The RRT bulletin board may be used to post POLREPs, weather forecasts, stream flow predictions, minutes of incident-specific RRT meetings, etc. This system may be used in addition to but not in lieu of the POLREP defined under Subsection D.2.F (above).

The local RRT system manager in Region V, the Ninth USCG District Marine Safety Division, maintains the bulletin board. A member of the RRT or an OSC may request that the bulletin board be made available for a response. The Marine Safety Division staff will create a new "incident" on the board and thereby notify RRT members and other participating agencies. Response personnel can then load reports onto the board, using the RRT command. Annex 15 provides additional information concerning use of the NOAA RRT system.

(2) ORSANCO

ORSANCO operates an electronic bulletin board which is available to provide water quality information during spill events in the Ohio River basin. The system is resident on an IBM-PC and employs Mustang's Wildcat Bulletin Board software. In addition to spill-related information, ORSANCO posts daily flow data and seasonal water quality data on the Board. There is no charge or formal registration procedure to use the system. Anyone can call and obtain immediate access to whatever is on file. Contact ORSANCO (see Annex 5) for information concerning procedures for logging onto the system and for reading reports.

(3) Hazardous Materials Information Exchange (HMIX)

The HMIX is a computerized bulletin board designed especially for the distribution and exchange of hazardous materials information. The HMIX provides a centralized database for sharing information regarding hazardous materials emergency management, training, resources, technical assistance, and regulations. With the HMIX, information can be retrieved, provided to other users, or shared with peers. Additional information concerning HMIX features is provided in Annex 15.

H. NRC TELECONFERENCE SERVICE

The National Response Center 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.

Federal OSCs and RRT chairmen may request establishment of a teleconference by contacting the NRC Duty Officer. They may request emergency conferences at any time, but should provide one-day advance notice whenever possible. Annex 15 contains USCG Commandant

Notice 2010 (COMDTNOTE 2010), dated March 7, 1990, which discusses the NRC's teleconference service in more detail, including the three methods of establishing a teleconference.

In addition, FEMA has a dedicated teleconference system capable of handling ten participants.

3. SOURCE CONTROL

A. ACTIONS TO LESSEN IMPACT

Defensive actions should begin as soon as possible to prevent, minimize, or mitigate the threat to the public health or welfare or to the environment. Actions may include the following:

(1) Analyzing water samples to determine the source and spread of the contaminants;

(2) Controlling the source of the discharge;

(3) Measuring and sampling;

(4) Source and spread control or salvage operations;

(5) Placement of physical barriers to deter the spread of the oil or to protect endangered species;

(6) Control of the water discharged from upstream impoundments; and

(7) The use of chemicals and other materials in accordance with the NCP, to restrain the spread of the oil and mitigate its effects.

Appropriate actions should be taken to recover the oil or mitigate its effects. Of the numerous chemical or physical methods that may be used, the chosen methods should be the most consistent with protecting the public health and welfare and the environment. Sinking agents shall not be used.

Oil recovered in cleanup operations and contaminated materials shall be disposed of in accordance with this RCP and local contingency plans.

B. CHEMICAL AGENT USE FOR RESPONSE TO OIL SPILLS ON SURFACE WATERS

The NCP provides for the use of dispersants and other chemicals for spill containment and cleanup. The proposed rules published in the Federal Register dated March 8, 1990, permit the OSC/RPM to authorize use of any chemical product without requesting permission if its use is necessary to prevent or substantially reduce a hazard to human life. In situations where a human hazard is not present, the OSC/RPM must receive the concurrence of (1) the U.S. EPA RRT representative(s), and (2) the RRT representative(s) of the affected State(s), and consult with the DOI/DOC natural resources trustees, where practicable, before authorizing use of a listed product.

U.S. EPA has compiled a list of dispersants and other chemicals which the OSC/RPM and/or PRP may consider for use during a spill emergency, as required by section 311(c)(2)(G) of the CWA. (The PRP may propose use of a chemical, but may not proceed with its use without authorization from the OSC/RPM.) The OSC/RPM may not authorize use of a product that is not listed on the Product Schedule. The NCP Product Schedule provides information concerning the different products that may be used. It does not authorize or pre-approve use of any of the listed products. Products may be added to the schedule through the process described in section 300.920 of the NCP. Contact the U.S. EPA representative of the RRT (see Annex 1) for updates to the Product Schedule.

Sinking agents shall not be used in Region V. Region V does not promote the use of dispersants, other oil emulsifiers, surface collecting agents, biological additives, burning agents, or miscellaneous oil spill control agents on surface waters, particularly near sensitive wetlands or water supplies (fresh water systems). Such use only adds to the potential for serious impact of already released petroleum products. This stance is necessary to protect fragile aquifers, sensitive ecosystems, and numerous potential and existing surface and subsurface water intakes (potable and non-potable) in Region V.

The Region does recognize, however, that as a last resort, such agents may have some limited applicability. One of the few situations in which chemical use might be considered for reasons other than protection of human life is during the migratory season, when a large percentage of the North American waterfowl populations is found on the Mississippi River. Before such materials are applied, the OSC/RPM and/or PRP shall, on a case-by-case basis, obtain the concurrence of the U.S. EPA representative to the RRT and the RRT representative(s) from the State(s) with jurisdiction over the surface waters threatened by the release or discharge, and shall also consult with the appropriate Federal natural resource trustees and land management agencies.

Steps to a Chemical Use Application: The following list provides the expected course of events and necessary approvals for a chemical agent application operation in Region V.

(a) The OSC/RPM will investigate the reported oil spill in the Region as necessary. Reported releases will be evaluated using the following means:

(1) Use of Environmental Sensitivity Index (ESI) maps. These maps have been prepared by NOAA and other agencies for some areas of Region V and contain information on the location of environmental resources and the sensitivity of shorelines (see Subsection D.6.F, below, for further information on ESI maps in Region V). Individual States may have similar types of maps.

(2) Obtain an oil spill trajectory from NOAA, SSC, or other applicable sources, if available (see Section E, Resources.)

(3) Obtain through the NOAA SSC interpretation of the ESI maps and further information on the effects of oil/chemical mixture, and of the oil itself on environmental resources at risk.

(4) If chemical use is approved by the respective States(s), then the OSC will begin work on the Chemical Use Checklist. Generally, the SSC will assist the OSC/RPM in completing the checklist. The OSC/RPM will supply the

appropriate members of the RRT with the information contained in the checklist. The U.S. EPA Region V Chemical Use Checklist is provided in Annex 10.

(5) The OSC/RPM and SSC will use the checklist to evaluate the potential for using chemicals.

(b) The OSC/RPM will request approval to use chemicals on behalf of the spiller by establishing a conference call with the following members of the RRT: the U.S. EPA RRT Co-Chair, the RRT representatives of the affected States, and the DOC and DOI RRT representatives when practicable.

The RRT members involved in the conference call will be briefed on the incident and the request to use chemicals, using the Chemical Use Checklist. Where possible, the OSC will forward a checklist to RRT members by electronic means before the above call is placed.

(c) Any chemical use operation on the Regional boundary will require coordination with appropriate RRT members from the bordering Region. The RRT members will coordinate information and arrange conference calls for the necessary interface with a bordering Region.

(d) Upon approval from the specified RRT members, the OSC/RPM may authorize chemical applications. The OSC/RPM shall monitor all chemical applications in Region V.

(e) In life-threatening situations, the OSC/RPM may apply chemical agents without first going through the above approval process. The OSC/RPM shall notify the appropriate RRT members as soon as practicable of any chemical agents used under life-threatening conditions.

Planning for Chemical Agent Use/Non-use: The purpose of planning for chemical use/non-use is to identify locations of specific sensitive resources and to have information readily available for the OSCs/RPMs to make informed decisions to eliminate opportunities for delay in the decision process.

Planning is critical for chemical use because a decision must be made soon after the incident. Each State in Region V must plan to enable itself to make a decision readily and efficiently as to whether it will allow the use of chemicals if requested.

Several response options are usually possible. Some choices include mechanical recovery; use of dispersants; allowing for natural removal of oil from the environment; burning oil off the surface; and cleanup of the shoreline or other areas which may be impacted by the spill. In practice more than one option may be used simultaneously, in different parts of the spill.

The choice of options will depend on the circumstances of the spill. Factors to consider in selection of response options include:

(a) How much oil was spilled?

(b) What kind of oil was spilled?

(c) Where was it spilled?

(d) How far has it spread?

(e) Where is the oil being transported either by wind or by current?

(f) What are the weather and water conditions?

(g) Is visibility good or bad?

(h) Are there any sensitive resources which might be affected by the spill?

(i) Are equipment and supplies for the chosen option available to clean up the spill? Is the equipment of an adequate design and in good working order?

(j) How much time must elapse before recovery action can begin?

Decisions regarding chemical use usually involve at least the following questions:

(a) Is chemical use allowed by current government regulations?

(b) Is there sufficient freshwater toxicity data to evaluate the chemical effects on freshwater biota?

(c) Are there local stockpiles of the chemical agent?

(d) Is chemical use acceptable under the conditions of the particular spill?

(e) What rate of application should be allowed?

(f) Are there any locations where the rate of chemical applications should be limited?

Of these questions, the first question should be answered well in advance of any spill. The answers to questions (b) and (c) will depend on the data the RRT succeeds in collecting from manufacturers, which are not required to submit freshwater toxicity data for the NCP Product Schedule. The answer to question (d) will depend on the circumstances surrounding an actual spill. The decision to permit chemical usage can only be made after a spill occurs. Questions (e) and (f) can usually be answered in advance of a spill. If the conditions and limitations for chemical use are considered beforehand, a decision regarding use of chemicals will be expedited.

Chemical Use Checklist: OSCs/RPMs should have a checklist for every conceivable application. The OSC/RPM will supply the appropriate members of the RRT with the

information contained in the checklist. The checklist provides information concerning the circumstances of the spill, trajectories, environmental resources at risk, and available decision makers with the information necessary to make a decision on the use of chemical agents.

4. POPULATION PROTECTIVE ACTIONS

Protective actions for human populations are either shelter in place, evacuation, or some combination of the two (e.g. evacuate the general population but shelter bedridden patients, jail populations, etc.). Guidance is currently being developed by FEMA in conjunction with other Federal agencies on the decision-making process between evacuation and in-place sheltering. Until that guidance is out, it should be noted that if no decision is made, people will, by default, be sheltered in place, albeit not as effectively.

5. WORKER HEALTH AND SAFETY

The OSHA and U.S. EPA worker protection standards (29 CFR 1910.120 and 40 CFR 11) implement Section 126 of Title I of the Superfund Amendments and Reauthorization Act (SARA) of 1986. The Worker Protection Standards apply to employers whose employees are engaged in hazardous waste operations and emergency response. The OSHA regulations apply directly to private and Federal employees and to those State and local government employees in the States having OSHA-approved plans. U.S. EPA's worker protection regulations cover State and local government employees without OSHA-approved plans (ref 300.150 of the NCP).

6. RESOURCE PROTECTION

Mitigation and cleanup of spills requires a knowledge of resources at risk. Because an infinite number of source locations and pollutant paths are possible, a strict prioritization of protection strategies is difficult. However, identification of resources potentially at risk before an incident, and discussion of their relative importance, are useful processes, both technically and from a communications and human standpoint.

Sources of resource information are provided in this section. Planning is the preferred means to identify protection strategies, as it reduces time required to implement effective protective measures and improves coordination through prior personal contact between responsible agencies. Where planning has not been completed, early notification and coordination with the appropriate agencies is critical. This section identifies types of resources to be considered for protection. Specific contacts for resource information are provided in Section E.8 of this plan.

A. FISH, WILDLIFE, AND PLANTS

USFWS Field Response Coordinators are the primary Federal contact for information about migratory birds, endangered and threatened species, and fish and wildlife at risk as a result of spills in the inland and coastal zones. The list of current USFWS personnel and their geographic areas of expertise and/or responsibility is provided in Annex 6, USFWS Regional Pollution Response Coordinators.

Each State has Fisheries and Wildlife Biologists who may be assigned to a Department of Natural Resources or separate State agencies. These personnel are assigned to geographic areas within a State (district or region) and can be identified through State emergency response agencies or USFWS Pollution Response Coordinators (see Annex 6).

Each State has a Natural Heritage or Natural Features Inventory. These databases were originally compiled by The Nature Conservancy and have been turned over to States for management. These inventories incorporate observations of endangered, threatened, and otherwise specially designated species of fish, wildlife, and plants. The Inventory is generally housed in the State Department of Natural Resources. Telephone numbers for Region V Inventories are listed in Annex 8. These offices are generally available during business hours only.

Local expertise may be garnered through contact with higher levels of government or Emergency Management Coordinators. These persons are generally located at county offices or city halls (for larger municipalities). State emergency management agencies or FEMA can assist the OSC in identifying these individuals.

Sea Grant Universities and Extension Agents may be a source of local knowledge outside the public sector. These agents have contact with local scientists, fishermen, environmental groups, and other sources that may supplement information provided by regulatory agencies. They may be contacted through NOAA SSC.

B. DRINKING WATER INTAKES

One of the major differences between coastal marine spills and freshwater spills (to Great Lakes and inland surface waters) is the potential impact on drinking water supplies. In many cases users of surface waters do not have an alternate source of supply, nor do they have treatment or monitoring facilities for oil or chemical contamination.

Identification of drinking water authorities responsible for the water intakes in surface waters may be found in USCG Local Contingency Plans, State Health Departments, and locally in Emergency Management Plans.

C. PROTECTED HABITAT

There are a variety of protected areas known as forests, parks, preserves, reserves, management areas, etc. These protected areas are managed by public or private organizations (e.g., The Nature Conservancy). Sources of this information include Federal or State land management agencies which include the Departments of Interior, Agriculture, and Commerce at the Federal level and their counterpart agencies at the State and local levels. Frequently maps or charts contain this information.

D. CULTURAL SITES

Identification of culturally sensitive sites in the vicinity of a spill can be accomplished by contact with the State Historic Preservation Officer (SHPO). This individual is generally associated with the State Historical Preservation Office or Society, which may or may not be within a department of State government. Additionally, DOI's National Park Service has responsibility for sites located on Federal lands within the region. A list of these contacts for Region V is provided in Annex 7. These offices are generally available during business hours only.

E. NATIVE AMERICAN LANDS

If Native American lands and treaty areas (e.g. fishing rights) may be affected by a spill, contact with the appropriate Tribal leaders and commission leaders must be made. Identification of these areas is not always straightforward. The DOI's Bureau of Indian Affairs (BIA) is a resource to be called upon for identification of pertinent areas and for contacts with Federally recognized Tribal organizations. It is possible that States may recognize other Tribal organizations. In these cases, BIA can be a source of appropriate State contacts. For notification of Federally-recognized Indian Tribes, contact the BIA representatives listed in Annex 3.

F. ENVIRONMENTAL SENSITIVITY MAPS

A process to plan for resource protection in the coastal zone has been partially implemented in Region V. The process, known as Environmental Sensitivity Index (ESI) Mapping, involves collecting existing resource data and performing a limited field survey of the coastal zone to estimate its susceptibility and persistence to oil. A natural extension of these resource maps is the development of protection strategies. Other information, such as the locations of boat launching ramps, staging sites for equipment and airports, is collected to facilitate this process.

Compilations of resources at risk were completed from 1983 to 1985 for portions of Region V by NOAA, using the ESI process. The areas completed include:

(a) The St. Mary's River, from Whitefish Bay to Detour Passage;

(b) Lake Michigan, from the Michigan/Indiana border to Frankfort, Michigan; and

(c) Port Huron, Michigan, south and east to the Ohio/Pennsylvania border.

Currently, a project covering the MSO Milwaukee Zone (Lake Michigan coast of Wisconsin, including a small portion of Michigan within Green Bay), is in process. This project is expected to be completed by September 1992. Other projects are planned, with completion dates through FY94, pending funding. No plans exist for mapping the inland rivers; however, the concept has been discussed at meetings of UMRBA.

The available ESI maps for the Great Lakes may be examined at the office of the NOAA SSC in Lansing, Michigan; at the Ninth Coast Guard District Office in Cleveland, Ohio; or at the Coast Guard Marine Safety Office or Captain of the Port Office responsible for the mapped area. Information is portrayed on either USGS topographic maps or on NOAA nautical charts. Information is currently available in hard copy only; however the MSO Milwaukee project will be available in digital form. Contact the NOAA SSC regarding ESI maps currently available, or to order specific ESI maps.

G. WILDLIFE CONSERVATION

OPA Section 4201(b)(2)(M) has required the NCP to include a Fish and Wildlife Response Plan which will provide "for the immediate and effective protection, rescue, and rehabilitation of, and minimization of risk of damage to, fish and wildlife resources and their habitat that are harmed or that may be jeopardized by a discharge." This revision to the NCP is under

development; however, it is believed that responsibility for preparing detailed plans of resources and strategies to meet the above-stated objectives will be required in Regional and Area plans. This RCP provides an overview of Regional policy and resources, but will leave it to Area Plans to identify particular local agencies, sources of supplies and personnel, and procedures to implement a wildlife conservation program during a spill.

The contamination of wildlife by oil has a high public impact which must be recognized by the OSC and members of the RRT. Public interest, inquiries, criticism, and demands for the cleaning of affected wildlife can seriously hamper the OSC's 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 OSC, and at the first sign of wildlife involvement, the OSC/RPM should contact DOI (through USFWS Regional Pollution Response Coordinators; see Annex 6) to request organization and supervision of the wildlife protection efforts. Funding will be required either from a responsible party or the pollution fund for these efforts. The following brief synopsis outlines the three elements of a wildlife conservation program:

(1) **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.

(2) **Collection:** Volunteers frequently express interest in collecting impacted wildlife. Due to safety considerations (contact with pollutants and physical hazards due to handling wildlife) and concern for the wildlife (additional stress may be placed on wildlife), only trained collectors should be allowed to participate. Additionally, Federal and State permits are required for collection of most wildlife.

(3) **Rehabilitation:** This medical procedure should be done only 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.

Tri-State Bird Rescue and Research, Inc., of Wilmington, Delaware, and International Bird Research and Rehabilitation Center of Berkeley, California, are the two nationally recognized centers that can assist in planned or emergency training and organization of wildlife conservation efforts. Several regional centers have experience with oiled wildlife. USFWS Regional Pollution Response Coordinators are sources of these and other contacts in the Region. (See Annex 6). A reference manual, Oiled Bird Rehabilitation: A Guide for Establishing and Operating a Treatment Facility for Oiled Birds, has been prepared by Tri-State Bird Rescue and Research, Inc., and is a valuable resource for learning more about all aspects of wildlife conservation. Contact Tri-State Bird Rescue and Research, Inc., at 302-737-7241.

7. DAMAGE ASSESSMENT

A. DESIGNATION OF NATURAL RESOURCE TRUSTEES

Natural resources include land, fish, wildlife, biota, air, water, groundwater, drinking water supplies, and other such resources belonging to, managed by, held in trust by, appertaining to, or otherwise controlled by the United States, any State or local government, or Indian

Tribe (ref NCP 300.5). See Annex 4 for a list of the current Federal and State natural resource trustees, and Annex 3 for a list of Tribal contacts.

(1) **Federal Trustees:** The NCP, CERCLA as amended, and Executive Order 12580 delegate to various Federal agencies the role of trustee for natural resources. The role of trustee is in addition to the other functions an agency may perform during a response. As trustees, agencies are responsible for assessing damages to resources under their jurisdiction occurring as a result of oil spills or the release of hazardous substances. Additionally, agencies are responsible for seeking recovery for losses from the responsible person(s) and for devising and carrying out rehabilitation, restoration, and replacement of injured natural resources. Where more than one trustee has jurisdiction over a resource, these agencies will coordinate and cooperate in carrying out the activities described above (ref NCP 300.600).

The jurisdictions of Federal agency natural resource trusteeships in Region V are as follows:

a) Department of the Interior, including:

U.S. Fish and Wildlife Service: Federal lands in Region V managed by the USFWS include all National Wildlife Refuges and National fish hatcheries. USFWS also administers DOI trusteeship over migratory birds and Federally listed endangered/threatened species.

National Park Service: Federal lands in Region V managed by the NPS include all units of the national park system (e.g. national parks, national monuments, national seashores, national recreation areas, etc.).

Bureau of Indian Affairs: Resources in Region V for which the BIA acts as trustee include Indian Reservations and other lands or natural resources held in trust for an Indian Tribe (including off-reservation natural resources).

Bureau of Land Management: In Region V the BLM manages public lands and Federally owned minerals (underlying private as well as public lands).

b) Other Federal trustees for natural resources include:

Department of Agriculture: Resources in Region V under the jurisdiction of USDA include national forests.

Department of Commerce: Resources in Region V under DOC's jurisdiction include marine sanctuaries, estuarian reserves, and certain anadromous fish.

Department of Defense: Federal lands in Region V under the jurisdiction of DOD include military lands and COE Project Lands.

Department of Energy: Federal lands in Region V under the jurisdiction of DOE include DOE lands and facilities.

RRT representatives from trustee agencies may also serve as contact points to discuss agency policy concerning trustee resources.

(2) **Indian Tribes:** The Tribal Chairman or head of the tribal governing body, or person designated by Tribal officials, acts as the trustee. Natural resources under Indian Tribal trusteeship include lands and other natural resources belonging to, managed by, controlled by or otherwise appertaining to the Tribe; or held in trust for the Tribe; or belonging to a member of the Tribe (if subject to a trust restriction on alienation).

(3) **State Trustees:** Natural resources under State jurisdiction include all fish, wildlife, and biota (including a shared trusteeship with the Federal trustees for certain plants and animals), surface and ground water, air, and land.

B. CONSULTATION WITH NATURAL RESOURCE TRUSTEES AND OTHERS BY OSC/RPM

To facilitate damage assessment and minimize impacts to natural resources and assist trustees in carrying out their responsibilities, the OSC/RPM will provide the following support:

(1) Natural resource trustees have a valid consultation role where a release poses substantive injury to natural resources. Where trustee representative(s) respond on-scene to a release, the OSC will include the lead administrative trustee in deliberations concerning cleanup strategies.

(2) OSCs should notify the various Federal, State, and Indian trustees of releases or potential releases that may injure natural resources under the respective trustee jurisdictions. Subsection D.2.D, "OSC Notification Responsibilities," reflects arrangements developed within Region V for the notification of trustees.

(3) The information gathered by an OSC to support penalty assessment, cost recovery, and the development of a cleanup strategy may be of value to natural resource trustees during a subsequent damage assessment action. OSCs will ensure the safeguarding of this material, and should confer with the lead administrative trustee prior to disposal of information collected during the response. The OSC shall make available to trustees of affected natural resources information and documentation that can assist the trustees in the determination of actual or potential injuries to natural resources.

8. COMMUNITY RELATIONS

The lead agency shall designate a spokesperson who shall inform the community of actions taken, respond to inquiries, and provide information concerning the response action. All news releases or statements made by participating agencies shall be jointly coordinated and funneled through a public information office, with the approval of the OSC. The spokesperson shall notify, at a minimum, immediately affected citizens, State and local officials and, when appropriate, emergency management agencies. OSCs may consider use of the RRT to assist in media relations and other community relations activities. Also, responsible parties may participate in implementing community relations activities, at the discretion of and with oversight by the OSC.

For response actions lasting longer than 120 days, a community relations plan will be prepared, focusing on establishing an integrated communications network that can continue after the initial emergency has been abated. Prior to preparing a community relations plan, the OSC or community

relations staff must meet with local officials and interested citizens to obtain information about the site and to identify public concerns. The plan should describe the site background, the nature of the community concern, the key site issues, and the objectives of the community relations activities.

When U.S. EPA is the lead agency, the U.S. EPA Office of Public Affairs, in consultation with the OSC, will begin to complete a Standard Community Relations Plan (CRP) Form at the time that the Action Memorandum is originated (see Annex 17 for U.S. EPA Standard Community Relations Plan Form).

The OSC will also ensure that an Administrative Record is made available to the public at or near the site. The Administrative Record is a collection of information that U.S. EPA has considered or relied on in the selection of a response action. Section 113(k)(2) of CERCLA requires that interested persons, including potentially responsible parties and the local community, be given an opportunity to examine and comment on the Administrative Record.

For response actions lasting less than 30 days, the following apply:

(a) The Record file must be maintained at a central location, the Regional Office of U.S. EPA;

(b) The Record must be made available to the public no later than 60 days after initiation of activity at the site, and U.S. EPA must inform the public that it is available for public inspection by placing a notice in a major newspaper;

(c) No public comment period on the Administrative Record is required when on-site activity lasts less than 30 days.

For response actions lasting more than 30 days, the above apply, except that a responsiveness summary on the significant comments received from the public must be prepared following the comment period.

The following techniques may be used by the OSC to provide the information needed by affected communities:

(a) Updated briefings for local officials;

(b) Press briefings, conferences, or site tours;

(c) Public consultations: face-to-face informal meetings with small groups of interested citizens, perhaps in a residence;

(d) Fact sheets;

(e) Formal public meetings; and

(f) Development and placement of the Administrative Record (site files) for review by the public.

9. CLEANUP AND RECOVERY

A. DISPOSAL

1. Federal Disposal

In order to ensure proper treatment and disposal of hazardous substances recovered from CERCLA emergency response or removal sites, Section 300.65 of the NCP requires that off-site transport of hazardous substances use only facilities operating under appropriate Federal or State permits or authorization. Hazardous substances removed from such sites may be transferred only to facilities that are operating in compliance with RCRA, TSCA, and all applicable State requirements. These requirements also preclude the use of disposal units that have releases of hazardous wastes or hazardous constituents, and of disposal facilities that have releases which have not been addressed by corrective action.

U.S. EPA issued policies and procedures related to these requirements on November 13, 1987, entitled "Revised Procedures for Implementing Off-site Response Actions" (OSWER Directive 9834.11). Specific OSC roles and responsibilities for implementing the requirements can be found in Section IV of the Superfund Removal Procedures Manual, dated February 1988 (OSWER Directive 9360.03B).

The OSC should coordinate closely with the Regional RCRA Off-site Coordinator (RROC), and/or TSCA personnel and the State as appropriate. The current Region V Off-site Coordinator is Gertrude Matuschkovitz (312-353-7921).

2. State Disposal

(a) Illinois

IEPA expedites spill residue disposal permitting through its Emergency Action Center in Springfield. Permits are required for open burning and may be prescribed in some cases. Spill residues are considered Special Wastes in Illinois and require permit authorization numbers from IEPA for acceptance for disposal in a landfill. The procedural aspects of such permits can be expedited by IEPA but the technical requirements must be met (i.e., characterizations of the waste and its suitability for acceptance by a particular facility). IEPA maintains a current list of hazardous materials remediation contractors and disposal/treatment facilities, as well as a list of licensed waste haulers.

During office hours, IEPA can issue emergency generator I.D. numbers (both State and Federal). During non-office hours, IEPA may issue exemptions for procedural requirements when necessary to prevent additional damage to the environment. Out-of-state wastes may require additional review time. Contact the Duty Officer at 217-782-3637 (office) or through 217-782-7860 (after hours).

(b) Indiana

IDEM's Office of Solid and Hazardous Waste Management has established a new method for obtaining disposal approval of spill/UST cleanup debris. The new approval method affects disposal of contaminated soils, vegetation, absorbent pads, "pigs", booms, and other inert material contaminated as a result of a spill or leakage from a UST, and is limited to situations where only the following virgin products or combination of those products have leaked or have been spilled:

(1) Gasoline (leaded or unleaded);

(2) Diesel fuels;

(3) Heating oils.

A generic approval for disposal of spill/UST cleanup debris has been issued to operators of specific sanitary landfills who receive special waste on a routine basis. Case-by-case approval from IDEM is no longer necessary for disposal of above-listed product cleanup debris into any of the approved landfill sites. The owner/owner's representative or contractor is required to contact the operator of an approved site prior to intended disposal and to provide the operator of the disposal site with a completed disposal notification form with each load for disposal. The owner/owner's representative is responsible for signing the disposal notifications form which attests that the information and circumstances of the spill are accurate and true. The owner/owner's representative shall also sign and date the disposal notification form upon receiving the waste for disposal.

(c) Michigan - Information not provided.

(d) Minnesota

In Minnesota, disposal options for waste generated from a spill vary, depending on the contaminant and waste media. The MPCA Spills and Emergency Response Team members can assist the PRP and expedite the necessary approvals for disposal of wastes generated from spills. In some emergency situations, the Team members may grant approval directly. Waste generated from oil spills can be disposed as follows:

Oil-contaminated water: After removal of free oil, the contaminated water can be stored for later treatment or disposed by discharge to a local wastewater treatment plant, surface water, or on land. In some cases, the water may require carbon filtration and/or air stripping before discharge.

Oil-contaminated soil: There are two options--land applying or land farming, and thermal treatment. The MPCA has developed guidance for both options.

Oil-contaminated debris: Possible options are coincineration with municipal or industrial solid waste, open burning (permit required), or landfill

deposition, depending on the volume, level of contamination, and location of the waste.

Oil-contaminated sorbent: For heavily saturated sorbent, incineration of these materials at a permitted solid waste facility is the only option. In some cases where little waste is generated and the sorbent has little contamination, the material can be wrung out, dried, and landfilled.

All disposal options must be approved by MPCA staff prior to disposal.

(e) Ohio

OEPA's Division of Emergency and Remedial Response OSCs facilitate arrangements for disposal of soils, spilled product, and contaminated water with the appropriate staff of other OEPA divisions. The Ohio Revised Code and Administrative Code provides emergency permitting for open burning, recovery/injection wells, explosives and hazardous waste emergency generator identification numbers assignment.

(1) Explosives: Under emergency conditions, the OEPA Emergency Response Duty Officer or OSC may grant verbal approval to local officials to detonate explosives. During business hours the responsible party must complete an application with the Central Office Division of Hazardous Waste Management (contact: 614-644-2917).

(2) Open Burning: The OSC may authorize open burning of hydrocarbons and associated debris if the material and spill site meet established criteria. Any open burning is coordinated with the fire department, air local, and the OEPA Division of Air Pollution Control through the district offices. Requests are handled on a case-by-case basis.

(3) Hazardous Waste Generator I.D. Numbers: Emergency Hazardous Waste Generator I.D. Numbers are now assigned by the OEPA Division of Hazardous Waste Management during business hours (contact: 614-644-2941). The Duty Officer and OSC may facilitate this process and help identify possible sites for waste storage and disposal.

(4) Hazardous Material Transporters: The Public Utilities Commission of Ohio (PUCO) registers Hazardous Material Transporters for OEPA. Over 500 companies are registered by the State of Ohio. The PUCO Transportation Division also enforces U.S. DOT's motor carrier safety laws (contact: 614-466-3191).

(5) Groundwater/Wastewater Discharges: The Division of Public Drinking Water oversees the construction standards for well construction. Enhanced recovery, involving shallow injection wells, requires a permit. Recovery wells, which result in a discharge to waters of the State, requires best available treatment standards to be met. Recovery systems may require the owner/operator to apply for

a permit to install. Typically, activated carbon is used on oil/water separation recovery systems before discharge to waters of the State is allowed. Permit applications are handled by the district office staff.

(6) Other: Treatment options such as on-site treatment or vapor recovery are handled on a case-by-case basis by the OSC.

(g) Wisconsin

On March 14, 1991, the State of Wisconsin issued its "Interim Policy for Promoting the In-State and On-Site Management of Hazardous Wastes in the State of Wisconsin," a policy designed to promote the recycling of hazardous wastes and the on-site and in-state treatment and disposal of hazardous waste resulting from clean-up actions. The policy applies to clean-ups conducted by responsible parties, the Federal government, and the State under the hazardous substances spills law, hazardous waste closure authorities, hazardous waste corrective action authorities, and applies to clean-ups undertaken by the Superfund, Leaking Underground Storage Tank (LUST), and Environmental Repair programs.

To define the State's waste management policy, WDNR has developed waste management guidelines. These guidelines provide specific examples of the preferred waste management approaches at clean-up actions and are integral to minimizing the export of hazardous waste. The guidelines are as follows:

1. Hazardous materials and treatment residuals should be recycled or reused whenever possible or practicable.

2. Remedies chosen will treat, store, or dispose of hazardous waste on-site and/or in-state, to the extent feasible.

3. Remedial options which involve out-of-state shipment of hazardous wastes - especially those involving no prior treatment of wastes - will be chosen only when in-state and/or on-site actions are infeasible.

4. Appropriate remedies often will combine on-site/in-state treatment and on-site disposal of hazardous wastes, including treatment residuals.

5. Innovative technologies should be considered when there are no conventional treatment options available and on-site disposal is impracticable due to site-specific conditions or risks associated with untreated wastes.

6. On-site containment will be considered for wastes that pose low, long-term threats or where treatment is impracticable (usually due to waste type or volume).

7. For wastes that need to be stabilized/secured (i.e. emergency actions) prior to completion of a long-term response at a site, the on-site

storage of any hazardous wastes is preferred over out-of-state shipment of waste. In the future, stabilized wastes should be incorporated into the longer-term response, when that option is timely and feasible.

These waste management guidelines represent the typical remedies that should be chosen at clean-up actions conducted in the State. However, WDNR recognizes that the final determination on such remedies will be made on a case-by-case basis. Accordingly, WDNR has adopted a set of eight remedy selection criteria to assist State and Federal agencies and responsible parties in determining the most appropriate remedy for a given site. These criteria are:

1. protection of human health and the environment;
2. attainment of legally-enforceable State and Federal laws;
3. long-term effectiveness;
4. reduction of toxicity, mobility, and volume through treatment;
5. implementability;
6. short-term effectiveness;
7. cost; and
8. public acceptance.

Before selecting a remedy which involves the management of hazardous wastes, a comparative analysis of the clean-up options utilizing this policy's waste management strategy and the evaluation criteria is to be undertaken and documented in a memo or report.

Once the analysis is complete, remedial actions may proceed for those sites where recycling or in-state and on-site management of hazardous waste is selected. For those sites where out-of-state treatment and/or disposal is proposed, the written documentation of how the waste management strategy and the eight evaluation criteria were applied must be submitted to the Director of the Solid Waste Management Bureau for review and approval. No out-of-state shipment of hazardous waste from clean-up actions shall be approved by WDNR staff without concurrence from the Bureau Director on the proposed action.

B. USE OF CHEMICAL AGENTS

As stated in Subsection D.3.B, the Region V RRT advocates use of mechanical methods over the use of chemical agents/dispersants in addressing spill incidents.

The OSC must choose the best method from the 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 Region V. If chemical use is considered, the guidelines in Subsection D.3.B this Plan are intended to aid the OSC in making a decision.

SECTION E: RESPONSE RESOURCES

1. EQUIPMENT

In cooperation with the Great Lakes Commission, a computerized inventory of public and private sector spill response equipment, personnel, and related resources is currently being undertaken. This is a massive, precedent-setting initiative that will provide public officials at all levels with instant access to vital information in the event of a spill. A Basin survey has been sent to hundreds of recipients in more than 20 different categories. The inventory will be operated out of HMIX, a joint service of FEMA and DOT.

It should also be noted that new Federal legislation provides for a national inventory; the RRT will work with appropriate officials to determine how Regional efforts can contribute to or become part of that effort.

2. FIELD SURVEY TECHNIQUES

A. REMOTE SENSING

A variety of land-based remote sensing methods exist which have been successfully used and are commercially available through contractors. Contact U.S. EPA and their TAT or ERCS contractors for details and access to these resources.

Aerial remote sensing, primarily used for locating pollutants in water, is in its early stages of development. Technologies are similar to land-based systems; however, data acquisition and interpretation are costly and of limited value. The agencies listed below have capabilities and experts that can be consulted regarding the use of these techniques.

EPA Environmental Photographic Center (EPIC), Warrenton, Virginia	**(703) 349-8970**
NOAA Statistical Services	**(301) 763-8051**
Environment Canada	**(613) 998-9622**

B. UNDERWATER RESPONSE

1. **Underwater Survey Equipment:** The following underwater survey equipment is available to the Region through the ERT. Contact Dr. David Charters (business hours 908-906-6825; residence 908-321-6660).

Remote Operated Vehicle (ROV): For use in observing underwater objects from shore or boat (1,000-foot depth limit).

Mesotech Sonar: Mounted on ROV to locate any object above bottom sediments. ROV directed to potential drums by sonar.

Proton Magnetometer: Locates metal objects underwater. Towed behind a boat.

Sediment and Water Sampling Equipment: Ability to sample water and sediments at any depth. Analyses performed at ERT's laboratory facilities, Edison, New Jersey.

Twenty-foot Boston Whaler: Trailerable boat specially designed for underwater electronic surveys and diving operations.

Side-Scan Sonar Survey Equipment: Accurately maps bottom.

2. **Diving Capabilities**

ERT Diving Team: Three U.S. EPA-certified divers with Level B-equivalent diving gear. Contact Dr. David Charters, ERT's Unit Dive Officer (business hours: 908-906-6825; residence 201-321-6660).

Commercial (Contract) Divers: For long-term underwater removals, Region V uses private diving firms which comply with U.S. EPA's Chapter 10 Diving Safety Regulations. Contact Walter Nied, Unit Dive Officer, U.S. EPA Region V (312-886-4466), for a list of qualified diving contractors and required equipment modifications.

Various Diving Equipment: Available from any of U.S. EPA's five diving units.

C. **TECHNICAL SUPPORT SECTION**

The Technical Support Section, Office of Superfund, Region V, has the ability to perform limited field surveys at hazardous waste sites. The Section has staff and equipment to perform four broad categories of surveys using various techniques and field equipment:

(1) Surface Geophysical Surveys - using ground-penetrating radar, electromagnetic surveys, magnetometers, seismic refraction, and resistivity measures.

(2) Subsurface geophysical surveys - using seismic tomography, electromagnetic surveys, natural gamma detection, single-point resistivity, spontaneous potential measures, fluid resistivity, and various borehole measures.

(3) Hydrogeological surveys - including water sampling, pump tests, and slug tests.

(4) Ecological surveys - including ecological assessments and wetland delineations.

The Section also has the equipment available to conduct x-ray fluorescence surveys to detect metals in soil.

3. SPECIAL TEAMS AND OTHER ASSISTANCE AVAILABLE TO OSCS/RPMS

Different Federal agencies can provide special forces that an OSC/RPM may call upon for assistance during an oil spill or hazardous substance release. These special forces are described below. They may be requested through the agency's RRT member.

A. COAST GUARD STRIKE TEAM

(609) 724-0008

Atlantic Strike Team

The Atlantic Strike Team (AST) is a pollution control team equipped and trained to assist in the response to oil or chemical incidents. The AST has personnel on standby to respond to incidents occurring in the Great Lakes and eastern United States. Services available from the AST include:

(1) technical expertise;

(2) supervisory assistance;

(3) cost documentation;

(4) deployment of salvage and pollution control equipment; and

(5) training in pollution response techniques.

B. ENVIRONMENTAL RESPONSE TEAM

(908) 321-6740

U.S. EPA ERT

The U.S. EPA Environmental Response Team (ERT) has expertise in treatment technology, biology, chemistry, hydrology, geology, and engineering. ERT can provide access to special decontamination equipment for chemical releases. It can also advise the OSC in the following areas:

(1) hazard evaluation and risk assessment;

(2) multimedia sampling and analysis;

(3) water supply decontamination and protection;

(4) degree of cleanup required.

C. ATSDR

(404) 639-0615

CDC/ATSDR

ATSDR, the lead Federal agency for hazardous materials incidents, can provide the following experts for consultation and advice:

(1) Within 10 minutes - an emergency response coordinator;

(2) Within 20 minutes - a preliminary assessment team consisting of a toxicologist, chemist, environmental health scientist, physician, and other health personnel as required;

(3) Within 8 hours - an on-site response team (if the incident warrants).

D. NAVY SUPERVISOR OF SALVAGE

SUPSALV
Emergency Activation (24 hrs.) **(703) 602-7527**
(703) 607-2578

The Navy Supervisor of Salvage and Diving, Office of the Director of Ocean Engineering (SUPSALV), maintains special equipment and trained teams for response to salvage-related oil and hazardous substance incidents. SUPSALV maintains an extensive inventory of oil pollution abatement equipment located primarily at Williamsburg, Virginia, and Stockton, California, which is containerized for immediate deployment by air or truck.

E. NOAA SCIENTIFIC SUPPORT COORDINATOR (SSC)

NOAA SSC - 24 hours **(206) 526-6317**
Business hours **(517) 337-6710**
FAX **(517) 337-6719**

The SSC serving the Ninth Coast Guard District is located in Lansing, Michigan. The NOAA SSC can provide the following information:

(1) spill trajectory;

(2) chemical hazard assessment;

(3) safety and health recommendations;

(4) environmental sensitivity assessments; and

(5) logistics and administration.

F. MARINE OCCUPATIONAL HEALTH COORDINATOR (MOHC)

The Ninth and the Second Coast Guard District offices each maintain a billet for a Marine Occupational Health Coordinator (District Industrial Hygienist). Primary responsibility of the incumbent is to provide occupational safety and health support for USCG Marine Safety personnel. This includes pollution response operations. The MOHC can provide USCG OSCs with advice on safety and health matters and can assist, on-scene, in environmental and medical monitoring activities. Outside of normal working hours, OSCs may request the services of the MOHC through the District Operations Center.

G. WEATHER INFORMATION

NOAA's National Weather Service (NWS) forecast offices are operated 24 hours a day and primarily provide weather forecasts. In addition, all provide hydrological information.

The NWS Forecast Office in Cleveland houses a computer weather product database. A password that can be obtained through the Cleveland office allows access to forecasts for all the Great Lakes and raw data (e.g., wind speed and direction) from many reporting stations, including NOAA data buoys throughout the Great Lakes. The NWS offices on the Inland Rivers provide river velocity information, as well as weather reports.

The offices listed below are Forecast Offices, at which forecasts are prepared. Other NWS offices located throughout the region have access to the same data and can be useful resources.

Cleveland, Ohio	(216) 267-0069
Coraopolis, Pennsylvania	(412) 644-2882
Charleston, West Virginia	(304) 346-7002
Rosemont, Illinois	(312) 353-4680
Ann Arbor, Michigan	(313) 668-2220
Minneapolis, Minnesota	(612) 725-3401
Milwaukee, Wisconsin	(414) 291-3068

H. USCG PUBLIC INFORMATION ASSIST TEAM (PIAT)

USCG PIAT (24 hrs.) **(919) 331-6000**

The USCG Public Information Assist Team (PIAT) is available to assist OSCs/RPMs and regional or district offices to meet the demands for public information and participation. Its use is encouraged any time the OSC/RPM requires outside public affairs support. Request for the PIAT may be made through the NRC or through the AST.

5. MODELS

A. WATER

Surface water models exist for the Great Lakes and interconnecting channels. The open water model for all of the Lakes was produced by NOAA's Great Lakes Environmental Research Laboratory (GLERL) and is housed on their VAX, accessible to anyone with a modem by contacting the number below.

NOAA GLERL (Great Lakes open water) **(313) 668-2120**

Interconnecting channel models have been produced by the COE Cold Regions Research Engineering Laboratory (COE CRREL). The St. Lawrence Seaway Development Corporation (SLSDC) also has a model for the St. Lawrence River. These models are available through COE and operate on an MS-DOS PC. Non-computerized hydraulic information which may be used to calculate travel times along the Great Lakes interconnecting channels is provided in CANUSLAK.

COE CRREL (Rivers-General, and St. Mary's,

Detroit--St. Clair, Ohio Rivers specifically) **(603) 646-4287**

SLSDLC **(315) 764-3265**

Time-of-travel estimations for the main stem of the Ohio River have been modelled by ORSANCO (model does not include the Monongahela and Allegheny tributaries). The model can be run on a MS-DOS PC and is available through ORSANCO.

ORSANCO (Ohio River, main stem only) **(513) 421-1151**

Models of near-shore areas and tributaries to the Great Lakes have various levels of detail. Contact with Sea Grant Institutions or USGS is suggested.

A model for the Mississippi River or Illinois Waterway was developed for U.S. EPA by Versar, Inc., in 1986. The model is called ReachScan, and is also on PC GEMS, a widely used U.S. EPA modelling program. Contact SSC for 24-hour information on pollutant movement in surface waters.

U.S. Army Corps of Engineers Districts

COE Districts are a source of information concerning water levels and velocities on the interconnecting channels to the Great Lakes and on the Inland rivers.

(1) COE's Detroit office is capable of running trajectory models for the St. Mary's and the Detroit-St. Clair River Systems.

Detroit (Detroit River/Lake St. Clair/St. Mary's River) **(313) 226-6413**

(2) COE's Buffalo office houses the St. Lawrence River model.

Buffalo (St. Lawrence River) **(716) 879-4200**

(3) The Rock Island District and the St. Louis District can provide projections of flow on the Upper Mississippi River and the Illinois Waterway.

Rock Island (Mississippi River from Minneapolis to St. Louis and the Illinois River) **(309) 788-6361**

St. Louis (St. Louis to Cairo and lower Illinois) **(314) 331-8000**

(4) The Pittsburgh Office and the Cincinnati Division can provide river flow data for the Ohio River.

Pittsburgh (Pittsburgh area to Wheeling, West Virginia) **(412) 644-6802**

Cincinnati (entire Ohio River) **(513) 684-3002**

(5) The Chicago Office can provide river flow information for waterways in the Chicago

Metropolitan area: the Chicago, Fox, DuPage, Little Calumet, and Kankakee Rivers.

Chicago (Illinois River, defer to Rock Island) **(312) 353-8884**

River Flow Information - National Weather Service (NWS) Forecast Offices

These are secondary sources of river flow information. They can convert flows to velocities at select locations along rivers.

Ohio River--Cincinnati, Ohio	**(513) 621-2732**
Lower Mississippi River--Slidell, Louisiana	**(504) 641-4343**
North Central--Minneapolis, Minnesota	**(612) 725-3091**
National Ocean Service (NOS), Rockville, Maryland (Water Levels)	**(301) 443-8441**

B. **AIR DISPERSION**

A variety of air dispersion models are available. Some are PC based; some require a mainframe computer.

Computer-based models are quite useful in response planning; however, their results should be applied with caution. Discussion of output with experts is critical to correct interpretation and limitations. ARCHIE (developed by FEMA, U.S. EPA, and DOT), and NOAA's ALOHA (part of CAMEO), are examples of simple computer-based planning models.

Listed below are agencies that can run air dispersion models, interpret the output, and provide expert advice during a response.

NOAA Modeling and Similar Studies (MASS)	**(206) 526-6317**
U.S. EPA ERT	**(201) 321-6740**
ATSDR	**(404) 639-0615**
Environment Canada	**(416) 346-1971**
Ontario Ministry of the Environment--Spills Action Center	**(416) 325-3000**

6. NON-FEDERAL CHEMICAL EXPERTISE

The technical and scientific information generated by the local community, along with information from Federal, State, and local governments, should be used to assist the OSC in devising response strategies where effective standard techniques are unavailable. Additional support is available from the following organizations:

A. **CHEMICAL TRANSPORTATION EMERGENCY CENTER (CHEMTREC)**

CHEMTREC 24-hour emergency number **(800) 424-9300**

CHEMTREC, a service of the Chemical Manufacturers' Association, provides technical data, coordination of chemical manufacturers, and emergency response information on chemical spills through 1-800-424-9300 (24-hour emergency number); for planning purposes, information is available at (202) 887-1255 during business hours.

B. AMERICAN PETROLEUM INSTITUTE (API)

API (business hours only) **(202) 682-8000**

API, 2100 L Street, NW, Washington, DC 20037, is an organization consisting of representatives of the petroleum industry. Technical and operational expertise is available.

C. TEXAS TECH UNIVERSITY PESTICIDE

National Pesticide Telecommunication Network **(800) 858-7378**

The National Pesticide Telecommunication Network provides information on pesticide-related health/toxicity/minor cleanup to physicians, veterinarians, fire departments, government agency personnel, and the general public.

D. CANADIAN TRANSPORT EMERGENCY CENTER (CANUTEC)

CANUTEC (24-hour number) **(613) 996-6666**

This organization has technical experts on duty 24 hours for chemical guidance, Canadian shipments only.

E. ASSOCIATION OF RAILROADS, BUREAU OF EXPLOSIVES

Bureau of Explosives (business hours) **(202) 639-2222**

CHEMTREC/Bureau of Explosives (24 hr.) **(800) 424-9300**

The Bureau of Explosives of the Association of Railroads, Washington, DC, can provide assistance in the area of accident assessment, classification of materials, environmental impacts, methods of cleanup, and mechanical evaluations for incidents involving railroad trains.

F. STATE ORGANIZATIONS

For services listed in this section, contact the appropriate State representative to the RRT.

Illinois: IEPA has six chemists on its emergency response staff and immediate access to four toxicologists and one certified industrial hygienist. Explosive disposal expertise is available commercially in the Chicago area or through the Illinois Secretary of State's Police Bomb Squad, based in Springfield.

IEPA and IDPH have human and environmental toxicologists readily available. The

University of Illinois supports a 24-hour veterinary toxicology hotline. Computer databases for physical, chemical, toxicological, and environmental data are readily available through government and commercial sources to both IEPA and IDPH.

Indiana: ISBH has a staff of toxicologists to provide toxicological information and to make recommendations on human health advisories, and to assess the impact of spills upon the food chain, contact, with contaminated water, etc.

Michigan: The Bureau of Environmental and Occupational Health and the Council on Environmental Quality of the Michigan Department of Public Health can both provide services. The Bureau of Environmental and Occupational Health has teams of district industrial hygienists that can provide assistance in the event of hazardous materials releases. The Toxicological Resource Center of the Council on Environmental Quality can identify chemicals, provide information on the characteristics of chemicals, perform air, water, or ground dispersion modeling, and provide public health evaluations.

Minnesota: The on-call staff of MPCA are trained in chemical emergency hazards. The MPCA toxicologist and Health Risk Assessment staff of the Department of Health can consult on hazards, but are not on call. The State's Duty Officer can reach and activate several local-based bomb squads throughout the State. MPCA's emergency contractor has staff trained in chemical hazards and industrial hygiene.

Ohio: In consultation with the Ohio Department of Health Epidemiology Section, toxicological information can be provided and recommendations can be made on human health advisories concerning spills which may impact water supplies, the food chain, or exposure victims.

Wisconsin: Information not provided.

SECTION F: FUNDING

1. GENERAL

The person or persons responsible for discharges or releases are liable for costs of cleanup. The OSC shall attempt to have the party responsible for the discharge or release voluntarily assume responsibility for containment, removal, and disposal operations. If the OSC determines that the responsible party has caused the discharge of oil or release of hazardous substances, he/she may initiate appropriate response actions established by OPA, CWA, or CERCLA. Action will be initiated by the agency administering the funding mechanism to recover such expenditures from the party responsible for the discharge, if known. The OSC may also issue an Administrative Order, either by consent or unilaterally, to require financially viable responsible parties to conduct the removal action.

Until new guidance is published, all incidents requiring funding must be screened by category: CWA Section 311(k) for oil only, and CERCLA for any potentially hazardous material. A U.S. EPA and USCG Headquarters agreement states that response to any potentially hazardous material that is an oil and hazardous materials mixture shall be CERCLA-funded.

2. OPA-FUNDED RESPONSES

A. ACTIVATION AND USE

The Oil Spill Liability Trust Fund (Oil Fund) administered by the Commandant, USCG, was established pursuant to Section 9509 of the Internal Revenue Code of 1986 (26 U.S.C. 9509) for response to oil discharges. Regulations governing the administration and use of this Fund are under development. Only responses to discharges specifically analyzed to be constituted of oil alone are eligible for OPA funding. If such a determination is made (i.e. oil only) and activation by the OSC is requested and granted, the Oil Fund is available to pay the direct allowable response costs authorized by the OSC that fall under the NCP Phase III operations, which include containment, countermeasures, cleanup, and disposal action to prevent, minimize, or mitigate threat(s) to public health or welfare or the environment. The Fund can then reimburse appropriate and reasonable response costs, authorized in advance by the pre-designated OSC, that have been incurred by Federal and State agencies. The costs of any agency's activities not authorized by the OSC will be funded from that agency's operational budget.

B. ACCESS TO THE FUND

For use of the Oil Fund, the OSC shall call the Second USCG District Office in St. Louis at (314) 539-2655 (working hours), or (314) 539-3706 (24-hour number), or (FTS) 262-3706; or the Ninth USCG District Office in Cleveland at (216) 522-3984 or (FTS) 942-3984 (working hours), or (216) 522-2412 (24-hour number). A case number and authorized ceiling must be

established. The next step is the coordination with a USCG Contracting Officer at the Atlantic Area Maintenance and Logistics Command (ATLANTA MLC):

Commander (fcp)
Coast Guard Maintenance and
Logistics Command Atlantic
Building 125, Room 320
Governors Island, New York 10004-5098

Contact:

Eleanor Deagan 212-668-7203

Area Operations Center
(After Hours) 212-668-7055

The OSC has discretion to contact any contractor. MLC will finalize the contract with any oil spill cleanup contractor. This action is necessary because of the lack of Basic Ordering Agreements in the Region. The MLC Contracting Office must complete this step, since the OSC is not authorized under USCG policy to finalize a contract, except in an extreme emergency, and must obtain notification from MLC before issuing an "authorization-to-proceed" document to a cleanup contractor. (Note: This contracting restriction applies to both U.S. EPA and USCG OSCs as standard Second District and Ninth District operating procedures.)

C. REIMBURSABLE EXPENSES

OPA 90 authorizes payment of "Removal Costs, including the costs of monitoring removal actions, consistent with the National Contingency Plan." This allows payment of incident-specific costs authorized by a Federal OSC, including costs of monitoring a responsible party's cleanup, as well as actual Federal cleanup activities.

The fund may pay:

(1) Costs of containment and removal of oil from water and shorelines;

(2) Costs to prevent, minimize, or mitigate oil pollution where there is a substantial threat of discharge of oil; and

(3) Costs of taking other related actions necessary to minimize or mitigate damage to the public health or welfare, including, but not limited to, damage to fish, shellfish, wildlife, public and private property, shorelines, and beaches.

Examples of incident-specific Federal removal costs payable from the fund include out-of-pocket expenses (e.g. per diem, travel, vehicle mileage costs; replication, transmission, and delivery of reports; rental cars, and field consumable costs), contracted costs, costs of U.S. EPA technical assistance teams, specific salary costs for temporary government employees hired or activated for the duration of the spill response, and specific salary costs for Federal employees not ordinarily available for oil spill response.

D. PROCEDURES FOR REIMBURSEMENT

To seek reimbursement from the Federal Pollution Fund, Federal agencies must submit their reimbursable expenses on Form SF 1080, "Voucher for Transfer between Appropriations and/or Funds," to the OSC for certification. The OSC will submit certified requests for reimbursements to USCG, Commander (m), Second USCG District within 60 days after completion of the cleanup action (33) CFR 153.417). The USCG will effect transfer of funds to the agency requesting reimbursement, and prepare a billing for the discharger from information on recoverable expenditures on the USCG form, "Personnel Vehicle and Miscellaneous Cost Accounting Sheet" (available from USCG). State agencies that do not have a formal agreement must submit a letter to the OSC requesting reimbursement. This letter must include a detailed itemized statement of reimbursable expenditures. Please refer to the USCG Marine Safety Manual for additional information.

E. COST RECOVERY ACTION

All agencies participating in a Federal response must submit an itemized account of all recoverable costs to the OSC within 60 days of the completion of a cleanup operation.

F. RECOVERABLE COSTS

The discharger incurs liability, up to the discharger's legal limit of liability, for all actual costs associated with the Federal removal following the Federal assumption of response activities. Recoverable costs include:

(1) Direct expenditures from the fund (i.e., payment of contractors or vendors);

(2) All reimbursable agency expenses;

(3) All personnel costs, including salaries of response personnel;

(4) Equipment costs, including depreciation and maintenance;

(5) Administrative overhead; and

(6) Pollution removal damage claims.

3. CERCLA-FUNDED RESPONSES

Two mechanisms exist for funding a response and response-related activities of another Federal agency other than U.S. EPA: an agency's Superfund budget, and an interagency agreement (IAG) authorizing access to the CERCLA Superfund account. Response operations for hazardous substances or mixture of hazardous materials and oil may be funded from the CERCLA Superfund account. Removal actions shall not continue after $2 million has been obligated or twelve months have elapsed from the date of the initial response, unless U.S. EPA grants an exemption in accordance with Section 104(c)(1) CERCLA, as amended. Additionally, CERCLA-funded action may not be taken in response to a release or threat of a release:

(a) Of a naturally occurring substance in its unaltered form or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found;

(b) From products which are part of the structure of, and result in exposure within, residential buildings or business or community structures;

(c) Into public or private drinking water supplies as a result of deterioration of the system through ordinary use.

However, U.S. EPA may respond to any release or threat of release if it is determined that it constitutes a public health or environmental emergency and no other person with the authority and capability to respond to the emergency will do so in a timely manner.

The U.S. EPA Waste Management Division Director has been delegated the authority to approve actions costing up to $2 million. State and local governments are not authorized to take actions that involve expenditures of CERCLA funds, unless an appropriate contract or cooperative agreement has been established.

The OSC is responsible for identifying whether technical assistance from another agency is necessary, and for making arrangements for that assistance. In addition, OSCs are responsible for initiating and processing any site-specific interagency agreements necessary for reimbursing Federal agency participation.

U.S. EPA OSCs may develop, negotiate terms, and award IAGs for site-specific, U.S. EPA-led actions. For these IAGs, the OSC:

(a) Defines the scope of work to be performed; outlines the responsibilities of each agency; determines the performance period; identifies primary contacts in each agency; names contractors and the dollar amounts of any contracts, if applicable; and determines the overall reporting, invoicing, and amendment requirements.

(b) Prepares four copies of the Interagency Agreement/Amendment (EPA Form 1610-1), and prepares the commitment notice and the transmittal/decision memorandum.

The OSC then monitors accomplishment of work in accordance with the IAG scope of work.

4. DOCUMENTATION FOR ENFORCEMENT AND COST RECOVERY

A. INTRODUCTION

The OSC in charge at the scene of a release may be from any one of several agencies. It is necessary, therefore, to establish uniform procedures for notification of counsel and for collection of samples and information consistent with the several phases in Federal response situations. Necessary information and sample collection must be performed at the proper times during Federal involvement in a spill for the purpose of later use in identifying the party responsible for removal cost recovery. Time is of great importance, as wind, tide, and current may disperse or remove the evidence and witnesses may no longer be available. Thus, during the response phases, the OSC must take the necessary action to ensure that information, records, and samples adequate for legal and research purposes are obtained and

safeguarded for future use. Detailed guidance on preferred procedures can be found in "Enforcement Considerations for Evaluations of Uncontrolled Hazardous Waste Disposal Sites by Contractors," U.S. EPA, National Enforcement Investigation Center, April 1980.

B. NOTIFICATION OF COUNSEL

Notification of appropriate counsel will be effected by counsel of the department responsible for furnishing the OSC. Coordination will be for joint and several actions concerning legal matters regarding the operation of the Plan and for advising the owner or operator that a determination has been made under the appropriate sections of CWA or CERCLA that removal is not being properly accomplished.

The information and reports obtained by the OSC are to be transmitted to the applicable RRT Co-Chair. Copies will then be forwarded to members of the RRT and others, as appropriate. The representative of the agency on the RRT having cost recovery authority will then refer copies of the oil or hazardous materials reports to that agency's respective counsel.

C. LEGAL NOTICE TO SUSPECTED RELEASER

The owner, operator, or other appropriate responsible person shall be notified of Federal interest and potential action in an oil or hazardous materials release by the agency furnishing the OSC. This notice shall include advice of the owner or operator's potential liability for proper response to the release; the need to perform removal in accordance with existing Federal and State statutes and regulations, this Plan, and the NCP; and identification of the OSC.

D. SAMPLE COLLECTION PROCEDURES

The OSC must observe precautions when collecting and handling liquid samples for analyses, as the character of the sample may be affected by a number of common conditions. Standard agency protocol are to be followed in the collection and shipment of all samples. Reports of laboratory analyses will be forwarded to the appropriate RRT Co-Chair for transmittal to counsel.

E. PHOTOGRAPHIC RECORDS

Photographs should be taken to show the source and the extent of oil or hazardous material, if possible using both color and black-and-white film. The following information should be recorded on the back of each photographic print: (a) name and location of vessel or facility; (b) date and time the photo was taken; (c) names of the photographer and witnesses; (d) shutter speed and lens opening; and (e) type of film used and details of film processing.

F. CHAIN-OF-CUSTODY RECORD

All samples and other tangible evidence must be maintained in proper custody until orders have been received from competent authority directing their disposition. Precautions should be taken to protect the samples from breakage, fire, altering, and tampering. It is important that a chain-of-custody of the samples be properly maintained and recorded from the time the samples are collected until ultimate use at the trial of the case. In this regard, a record of time, place, and name and title of the person collecting the sample, and each person handling

same thereafter, must be maintained and forwarded with the sample. Form No. 1-EPA-3500-5-1 may be used. U.S. EPA Regional procedures for sample collection, transport and custody are to be used for all samples submitted to the Central Regional Laboratory, U.S. EPA Region V, 536 South Clark Street, Chicago, Illinois 60605.

G. **OIL OR HAZARDOUS MATERIALS RELEASE REPORT**

The appropriate information for each oil or hazardous material release should be obtained by the OSC and reported in the appropriate format established by the Emergency Response Division, Washington, DC. Statements of witnesses, photographs, analyses of samples, and related documentation will be retained by the OSC for possible use in enforcement actions. In all major spills, the oil or hazardous material incident report should be completed and forwarded to the RRT Chairman.

5. **REIMBURSEMENT TO LOCAL GOVERNMENTS FOR EMERGENCY RESPONSE, SUBSTANCE RELEASES**

Section 123 of CERCLA authorizes U.S. EPA to reimburse local governments for some and (in rare cases) possibly all of the expenses incurred in carrying out temporary emergency measures in response to hazardous substance threats or releases. These measures or operations are necessary to prevent or mitigate injury to human health or the environment. The regulations are found in 40 CFR Parts 310.05 through 310.10.

The intent of this provision is to reduce any significant financial burden that may have been incurred by a local government (city, county, municipality, parish, township, town, Federally recognized Indian Tribe, or other official political subdivisions designated by a particular State) that takes the above measures in response to hazardous substance threats. Traditional local responsibilities, such as routine fire fighting, are not eligible for reimbursement. States are not eligible for this program and may not request reimbursement on their own behalf or on the behalf of a political subdivision within a given State (40 CFR Parts 310.20 and 310.30).

The following criteria must be met before a request for reimbursement is to be considered:

(1) Local government must have had a Title III plan by October 1, 1988.

(2) Response occurred after the effective date of this rule (October 17, 1986).

(3) Local government informed U.S. EPA or the NRC as soon as possible, but not more than 24 hours after initiating response.

(4) Response actions were consistent with CERCLA, the NCP, and the Emergency Planning and Community Right-to-Know Act (EPCRA).

(5) The request contains assurances that the response reimbursement does not supplant local funds normally provided for such activities.

(6) The applicant must have first attempted to recover the costs from all known PRPs and any other possible sources of reimbursement (State funds, insurance companies, etc.). Sixty (60)

days must be allowed for the above PRP to respond by making payment, expressing an intent to pay, or demonstrating willingness to negotiate payment.

CERCLA limits the amount of reimbursement to $25,000 per single response. If several agencies or departments are involved in a response, they must determine among themselves which agency will submit the request for reimbursement. Any request must be received by U.S. EPA within six months of the related response action.

Some of the allowable costs may include, but are not limited to, the following:

(1) Disposable materials and supplies acquired and used specifically for the related response.

(2) Employee compensation for response work that is not provided in the applicant's operating budget.

(3) Rental or leasing of equipment.

(4) Replacement costs of equipment contaminated to the extent that it is beyond reuse or repair.

(5) Decontamination of equipment.

(6) Special technical services needed for the response, such as those provided by experts or specialists.

(7) Other special services, such as utilities.

(8) Laboratory analysis costs related to the response.

(9) Costs associated with supplies, services, and equipment procured for a specific evaluation.

A review panel will evaluate each request and will rank the requests on the basis of financial burden. Financial burden is based on the ratio of eligible response costs to the locality's per capita income adjusted for population. If a request is not reimbursed during the review period for which it is submitted, the U.S. EPA reimbursement official has the discretion to hold the request open for a one-year reconsideration.

An application package can be obtained by contacting the RCRA/Superfund Hotline at U.S. EPA Headquarters at 800-262-7037. The toll-free telephone number for the hotline is (800) 424-9346. The application package contains detailed, line-by-line instructions for completing the application.

SECTION G: PREPAREDNESS--PLANNING, TRAINING, EXERCISING

1. PLANNING - REGIONAL LEVEL

The RRT is responsible for planning and coordination of contingency plans at the Regional level.

Regional hazardous materials planning is performed through the joint efforts of various Federal government agencies with major environmental, transportation, emergency management, worker safety, and public health responsibilities. These agencies are responsible for coordinating Federal emergency preparedness and planning on a nationwide basis. The Federal Regional Contingency Plan provides for coordination of timely and effective response by the various agencies and other organizations to oil discharge and hazardous substance releases in order to protect public health, welfare, and the environment.

A Joint Contingency Plan has been developed with Canada for releases of oil and hazardous substance. Catastrophic planning for disasters is coordinated by FEMA under the Federal Response Plan. The RCP is the Emergency Support Function 10 under the Federal Response Plan, along with the FRMAP.

The RRT will review, upon request of a LEPC, the Local Title III plan. The Region V RRT will review plans that have been accepted by the SERC. The RRT will review no more than two plans per State per year, because of the time involved for such reviews. The Region V will use NRT-1A to review the plans. Each agency will review specified sections of plans, according to the evaluation matrix presented in Annex 12.

The RRT advocates that all contingency plans at the local, State, and Federal levels be cross-referenced and compatible in order to ensure the quickest and most efficient use of resources and personnel.

A. SARA TITLE III

Title III of SARA, also known as the Emergency Planning and Community Right-to-Know Act (EPCRA), created a system of State and local planning agencies for chemical emergencies and provided a way for communities to gain information about potential chemical hazards. The Act's mandates cover three main topics: emergency planning, emergency notification requirements, and requirements for reporting hazardous chemical inventories. Regulations to implement the statute are found at 40 CFR Part 355. In Region V, five States (Illinois, Indiana, Minnesota, Ohio, and Wisconsin) have their own legislation patterned after the Federal law.

B. EMERGENCY PLANNING

Title III establishes two planning authorities for chemical emergencies: SERCs, and LEPCs. SERCs establish LEPCs, and supervise and coordinate the LEPCs' activities. LEPCs develop contingency plans which include identification of facilities covered by the law, designation of community and facility emergency coordinators, methods and procedures, information concerning emergency response equipment and facilities available in the community, and training and exercise programs. These plans are reviewed by the SERCs. The RRT may

review plans if requested to do so by the LEPC.

Indian Tribes are designated as the implementing authority of Title III on all lands within Indian country. A Tribe may form its emergency planning organization as a Tribal Emergency Response Committee (TERC), as a LEPC, or by joining an off-reservation LEPC.

Emergency planning requirements cover facilities that have an extremely hazardous substance (listed at 40 CFR 355 Appendices A and B) present on-site above a threshold quantity. Owners/operators of facilities subject to the law must identify themselves to the SERC and LEPC and develop a facility emergency plan. There are 458 local planning districts in Region V.

C. **EMERGENCY NOTIFICATION REQUIREMENTS**

Under Section 304 of EPCRA, after a release from a facility of an EPCRA extremely hazardous substance or a CERCLA hazardous substance above a reportable quantity, the facility's owner or operator must immediately notify the SERC and the community emergency coordinator for the appropriate LEPC. As soon as practicable after the release, the owner or operator of the facility must submit a written follow-up to the SERC and LEPC, updating the information given in the initial notification and providing information on response action taken, health risks associated with the release, and medical advice for exposed individuals.

D. **REPORTING REQUIREMENTS**

Sections 311 and 312 of EPCRA require the submission of information concerning hazardous chemical storage that may be useful in developing emergency response plans and in responding to actual emergencies. Under Section 311, facilities required to prepare or have available a Material Safety Date Sheet (MSDS) for each hazardous chemical under the Occupational Safety and Health Act of 1970, must submit an MSDS to the SERC, LEPC, and local fire department if the chemical is present at the facility above a threshold quantity. Facilities may submit a list of chemicals instead of MSDSs.

Under EPCRA Section 312, the facilities subject to Section 311 must also submit annually a hazardous chemical inventory form to the SERC, LEPC, and local fire department. This form contains an estimate of the maximum amount of each hazardous chemical present at the facility at any time, an estimate of the average daily amount of hazardous chemicals present, and the location on-site of hazardous chemicals.

2. **PLANNING - STATE LEVEL**

An appointed State director and designated State agency for emergency management coordinates the comprehensive emergency management activities of State government. This agency operates as a single point of contact for emergency response coordination for all types of disasters. Because many agencies within State government do not have day-to-day emergency response roles, most State departments appoint a representative to act as a liaison between the department and the State emergency management agency. When necessary, this representative mobilizes departmental personnel and resources, and coordinates departmental response to the emergency or disaster in support of the overall State response.

When an incident occurs, local government agencies are ordinarily first to respond. If the

emergency/disaster escalates, local government may request State assistance in the manner prescribed by State statute. Appropriate State agencies are notified and mobilized as necessary. In those situations where government agencies cannot fulfill all necessary emergency functions, the private sector augments existing forces. A State Emergency Operations Center (SEOC) may be established as the primary point of command for coordinating State actions as established in the State emergency management plan. In some situations, an alternate or additional coordinating center may be established at or near the site of an emergency/disaster.

3. PLANNING - LOCAL LEVEL

In the event of an emergency/disaster, police and fire services are ordinarily the first to respond. They initially assess the incident and determine its scope and magnitude. Additional agencies may become involved, depending on the nature of the incident. The local emergency management coordinator monitors and evaluates the incident.

If the emergency/disaster escalates to the point where coordination between several local agencies is necessary, the emergency management coordinator may recommend that the chief executive declare a local state of emergency, thereby activating the appropriate response and recovery aspect of local government.

Local response procedures are followed as stated in the local emergency response plans. If the emergency escalates beyond the capability of local government, the chief executive may request assistance from State government in accordance with State statutes.

4. PRIVATE INDUSTRY

The Chemical Manufacturers' Association (CMA), located in Washington, DC, has three counterpart State organizations in Region V, located in Illinois, Michigan, and Ohio. At the local level, CMA's Community Awareness and Emergency Response (CAER) program provides guidance to chemical manufacturers for interaction with the local community in the development of local hazardous materials response plans. CHEMTREC services are provided by CMA (see Subsection E.6.A of this Plan).

5. TRAINING

The Region V RRT strongly supports Regional training activities. The RRT management group is the panel that reviews the SARA Title III Section 305(a) training grants.

In order to extend training to the widest possible audience, the RRT maintains a video lending library of training materials concerning response and safety at the FEMA Region V office in Chicago, Illinois. When funds are available to the RRT, courses are offered targeting special needs identified by the members of the RRT. From time to time the RRT may sponsor courses to train its own members, and encourages that exercises be conducted as a training tool.

6. EXERCISING

The Region V RRT believes strongly in exercises as a means of enhancing preparedness. Exercises are used to test the effectiveness of plans, including the RCP, and to reveal more efficient ways of responding to a real emergency. Exercises are excellent training tools and the Region V RRT strongly endorses exercise programs at the State and local levels.

Member agencies of the RRT assist communities in design, conduct, and evaluation of exercises. The RRT participates as a group in at least one exercise per year. This exercise may be part of the biannual exercise that the USCG alternately hosts with the Canadian Coast Guard, as an Emergency Support Function in conjunction with State and local exercises or as a stand-alone tabletop exercise.

7. MENTAL HEALTH DEBRIEF

Disaster workers often experience delayed reactions to the death and destruction caused by disasters. No one is immune to the tragedy and mental stress. Responders should be debriefed within one week of their return home. It is each member agency's responsibility to ensure that its employees have this type of training.

A further discussion of this topic is provided in Annex 16.

SECTION H: ANNEX 1 - CURRENT MEMBERS OF STANDING RRT

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Primary

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PLAD: FEMA RGN V BATTLE CREEK MI//NTH BRANCH, CHICAGO, IL//Routing: RUCIANA

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1 July 1992

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Phone: 312-353-9045
24 hr.: 312-353-2318
FAX: 312-886-6064
NOAA Mail: EPA5
TWX/TELEX: None

Department of Transportation (Cont.)

Support

LCDR S.P. Mojonnier
RRT Coordinator
Commander (meps-1)
Marine Safety Division
Second Coast Guard District
1222 Spruce Street, Room 2.102G
St. Louis, MO 63103-2832

Phone: 314-539-2655
24 hr.: 314-539-3706
FAX: 314-539-2672
NOAA Mail: CGD2
TWX: 910-761-1168

Primary

James G. Roling, Manager
Regional Hazardous Materials Program
U.S. Department of Transportation
Federal Highway Administration
Office of Motor Carriers
18209 Dixie Highway
Homewood, IL 60430

Phone: 708-206-3178
24 hr.: None
FAX: 708-206-3207
NOAA Mail: None
TWX/TELEX: None

Alternate

Jose Sepulveda, Representative
Regional Emergency Preparedness (RETCO)
U. S. Department of Transportation
Federal Highway Administration
Office of Motor Carriers
18209 Dixie Highway
Homewood, IL 60430

Phone: 708-206-3192
24 hr.: None
FAX: 708-206-3207
NOAA Mail: None
TWX/TELEX: None

U.S. ENVIRONMENTAL PROTECTION AGENCY

Primary/RRT Co-Chair

Robert J. Bowden, Chief
Emergency and Enforcement Response Branch
U.S. EPA
77 West Jackson Boulevard
Chicago, IL 60604

Phone: 312-886-6236
24 hr.: 312-353-2318
FAX: 312-353-9176
NOAA Mail: EPA5
TWX/TELEX: None

Alternate

Mark Horwitz, Chief
Chemical Emergency Preparedness Program
U.S. EPA (5HS-26)
77 West Jackson Boulevard
Chicago, IL 60604

Phone: 312-353-9045
24 hr.: 312-353-2318
FAX: 312-886-6064
NOAA Mail: EPA5
TWX/TELEX: None

1 July 1992

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Primary

Kim McCutcheon
Spill Response Coordinator
WDNR Bureau of Solid & Hazardous Waste Mgmt.
P.O. Box 7921
Madison, WI 53707

Phone: 608-266-2857
24 hr: 608-266-3232
FAX: 608-267-2768
NOAA Mail: None
TWX/TELEX: None

SECTION I: ANNEX 2 - SUPPLEMENTARY 24-HOUR EMERGENCY TELEPHONE NUMBERS

CDC/ATSDR	
CANUTEC	(404) 639-0615
CHEMTREC/BUREAU OF EXPLOSIVES	(613) 996-6666
HMIX	(800) 424-9300
	(800) 752-6357 In Illinois: (800) 367-9592
ATLANTIC AREA STRIKE TEAM (AST)	(609) 724-0008
NATIONAL ASSOCIATION OF AGRICULTURE CHEMISTS	(513) 961-4300
NATIONAL WEATHER SERVICE FORECAST OFFICES	
Cleveland, Ohio	
Coraopolis, Pennsylvania	(216) 267-0069
Charleston, West Virginia	(412) 644-2882
Rosemont, Illinois	(304) 346-7002
Ann Arbor, Michigan	(312) 353-4680
Minneapolis, Minnesota	(313) 668-2220
Milwaukee, Wisconsin	(612) 725-3401
ORSANCO	(414) 291-306
NOAA SSC	(513) 421-1151
SUPSALV	(206) 526-6317
USCG PIAT	(703) 607-2578
	(919) 331-6000

SECTION J: ANNEX 3 - FEDERALLY RECOGNIZED INDIAN TRIBES IN REGION V

For assistance with spill notification and coordination with Federally recognized Indian Tribes in the midwest, contact the following representatives of the Bureau of Indian Affairs:

Ms. Terry Heidi, Area Archeologist and Tribal Coordinator
Bureau of Indian Affairs
Minneapolis Area Office
331 Second Avenue South
Minneapolis, MN 55401-2241

Phone: 612-373-1145
FAX: 612-373-1186
24-hour: 612-227-1686
(residence)

Mr. Bob Wynecoop, Asst. Area Director
Bureau of Indian Affairs
Minneapolis Area Office
331 Second Avenue South
Minneapolis, MN 55401-2241

Phone: 612-373-1100
FAX: 612-373-1186
24-hour: 612-431-7431
(residence)

Following are contacts for the Federally recognized Indian Tribes in Region V.

A. MICHIGAN

John McGeshick, Chairman
Lac Vieux Desert Tribal Council
P.O. Box 446
Watersmeet, MI 49969
(906) 358-4722

LVD Newsletter
P.O. Box 446
Watersmeet, MI 49969
(906) 358-4722

Bernard Bouschor, Chairman
Sault Ste. Marie Chippewa Tribal Council
205 Greenough Street
Sault Sainte Marie, MI 49783
(906) 635-6050

Jeff Parker, Chairman
Bay Mills Executive Council
Route 1, Box 313
Brimley, MI 49715
(906) 248-3241

Joseph Raphael, Chairman
Grand Traverse Tribal Council
Route 1, Box 135
Suttons Bay, MI 49682
(616) 271-3538

Ron Falcon, Chief
Saginaw Chippewa Tribal Council
7070 East Broadway Road
Mount Pleasant, MI 48858
(517) 772-1964

Fred Dakota, President
Keweenah Bay Tribal Council
Tribal Center Building
Route 1, Box 45
Baraga, MI 49908
(906) 353-6623

Kenneth Meshigaud, Chairman
Hannahville Indian Community Council
Community Center
Route 1
Wilson, MI 49896
(906) 466-2651

B. MINNESOTA

Dean Blue, Chairman
Upper Sioux Board of Trustees
P.O. Box 147
Granite Falls, MN 56241
(612) 564-2360

Nay/Ah/Shing Newsletter
Star Route Box 194
Onamia, MN 56359
(612) 532-4181

Bois Forte News
P.O. Box 16
Nett Lake, MN 55772
(218) 757-3261

Gerald Brun, Chairman
Red Lake Tribal Council
P.O. Box 550
Red Lake, MN 56671
(218) 679-3341

Shakopee Mdewakanton Sioux Community Newsletter
2330 Sioux Trail, NW
Prior Lake, MN 55372
(612) 445-8900

Darrell Wadena, Chairman
White Earth Reservation Business Committee
P.O. Box 418
White Earth, MN 56591
(218) 983-3285

Daniel Brown, Chairman
Leech Lake Reservation Business Committee
Route 3, P.O. Box 100
Cass Lake, MN 56633
(218) 335-8200

Margie Anderson, Chairman
Mille Lacs Reservation Business Committee
Star Route Box 194
Onamia, MN 56359
(612) 532-4181

Eugene Boshey, Sr., Chairman
Bois Forte Reservation Business Committee
P.O. Box 16
Nett Lake, MN 55772
(218) 757-3261

James Hendrickson, Chairman
Grand Portage Reservation Business Committee
105 University Road
Cloquet, MN 55720
(218) 879-4593

Stanley Crooks, Chairman
Shakopee Mdewakanton Business Council
2330 Sioux Trail, NW
Prior Lake, MN 55372
(612) 445-8900

Jody Goodthunder, Chairman
Lower Sioux Indian Community Council
Rural Route 1, Box 308
Morton, MN 56270
(507) 697-6185

Fond du Lac News
105 University Road
Cloquet, MN 55720
(218) 879-4593

Dibajamon Newsletter
P.O. Box 100, Route 3
Cass Lake, MN 56633
(218) 335-8200

James White, President
Prairie Island Community Council
5750 Sturgeon Lake Road
Welch, MN 55089
(612) 385-2554

Prairie Island Community Newsletter
5750 Sturgeon Lake Road
Welch, MN 55089
(612) 385-2554

3. WISCONSIN

Michael W. Allen Sr., Chairman
Lac du Flambeau Tribal Council
Tribal Office
P.O. Box 67
Lac du Flambeau, WI 54538
(715) 588-3303/-7735/-7233

Lac du Flambeau Tribal Newsletter
P.O. Box 67
Lac du Flambeau, WI 54538
(715) 588-3303/-7735/-7233

Gaiashkibos, Chairman
LaCourte Oreilles Governing Board
Tribal Office
Route 2
Hayward, WI 54843
(715) 634-8934

Donald Moore, Chairman
Bad River Tribal Council
Route 39
Odanah, WI 54806
(715) 682-7111

Bad River Newsletter
Route 39
Odanah, WI 54806
(715) 682-7111

Raymond McGeshick, Chairman
Sokaogon Chippewa Tribal Council
Route 1, Box 625
Crandon, WI 54520
(715) 478-2604

Richard Gurnoe, Chairman
Red Cliff Tribal Council
P.O. Box 529
Bayfield, WI 54814
(715) 779-3700

James Crawford, Chairman
Forest County Potawatomi General Council
P.O. Box 346
Crandon, WI 54520
(715) 478-2903

Reginald Miller, Chairman
Stockbridge-Munsee Tribal Council
Route 1
Bowler, WI 54416
(715) 793-4111

Rick Hill, Chairman
Oneida Business Committee
P.O. Box 365
Oneida, WI 54155-0365
(414) 869-2214

Oneida Communication Department
P.O. Box 365
Oneida, WI 54155-0365

Ms. Joanne Jones, Chairman
Wisconsin Winnebago Business Committee
P.O. Box 311
Tomah, WI 54660
(608) 372-5202

Wisconsin (Cont.)

Ho Chunk Wo Ldyk
P.O. Box 311
Tomah, WI 54660

Glen Miller, Chairperson
Menominee Tribal Legislature
P.O. Box 397
Keshena, WI 54135

Donald Saros, President
St. Croix Tribal Center
P.O. Box 287
Hertel, WI 54843
(715) 349-2195

4. OTHER INDIAN ORGANIZATIONS

Bernard Bouschor, Chairman
Tri-State Indian Housing Association
2218 Shunk Road
Sault Sainte Marie, MI 49783
(906) 635-6530

Gary Frazier, Executive Director
Minnesota Chippewa Tribe
P.O. Box 217
Cass Lake, MN 56633
(218) 335-2252

James Schlender, Executive Director
Great Lakes Indian Fish and Wildlife Commission
P.O. Box 9
Odanah, WI 54861
(715) 682-6619

Sharon Teeple, Executive Director
Inter-Tribal Council of Michigan, Inc.
405 East Easterday Avenue
Sault Sainte Marie, MI 49783
(906) 632-6896

Joseph Bresette, Executive Director
Great Lakes Inter-Tribal Council, Inc.
P.O. Box 9
Lac du Flambeau, WI 54538
(715) 588-3324

SECTION K: ANNEX 4 - NATURAL RESOURCES TRUSTEES

U.S. DEPARTMENT OF THE INTERIOR

Sheila Minor Huff
Regional Environmental Officer
U.S. Department of the Interior
230 South Dearborn, Suite 3422
Chicago, IL 60604

FTS: 353-6612
Comm: 312-353-6612
Res. 312-434-4757
FAX: 353-1051

Alternates:

Terence J. Miller
Regional Pollution Response Coordinator
U.S. Fish and Wildlife Service
Federal Building, Ft. Snelling
Twin Cities, MN 55111

FTS: 725-3536
Comm: 612-725-3536
Res: 612-436-1130
FAX: 725-3526

David Warburton
U.S. Fish and Wildlife Service
Federal Building, Ft. Snelling
Twin Cities, MN 55111

FTS: 725-3536
Comm: 612-725-3536
Res.: 612-437-6105
FAX: 725-3526

U.S. DEPARTMENT OF AGRICULTURE

Bonnie Ilhardt, Hydrologist and Hazardous Materials Team Member
U.S. Forest Service
310 West Wisconsin Avenue, Room 500
Milwaukee, WI 53203

Phone: 414-297-3697

Fred Hintsala, Engineer
Hazardous Materials Team
U.S. Forest Service
310 West Wisconsin Avenue, Room 500
Milwaukee, WI 53203

Phone: 414-297-1372

U.S. DEPARTMENT OF DEFENSE

Information not provided.

U.S. DEPARTMENT OF ENERGY

Information not provided.

STATE OF ILLINOIS

1 July 1992

Brent Manning, Director
Department of Conservation
524 South Second Street, Room 425
Springfield, IL 62706
Phone: 217-782-6302

Don Etchison, Director
Department of Energy and Natural Resources
325 West Adams, 3rd Floor
Springfield, IL 62704
Phone: 217-782-2805

Mary Gade, Director
IEPA
2200 Churchill Road
Springfield, IL 62708
Phone: 217-782-3397

Don Vonnahme, Director
Division of Water Resources
Department of Transportation
3215 Executive Park Drive
P.O. Box 19484
Springfield, IL 62764-9484
Phone: 217-782-2152

STATE OF INDIANA

Patrick Ralston, Director
Department of Natural Resources
402 West Washington St., Rm. W256
Indianapolis, IN 46204
Phone: 317-232-4020

Greta Hawvdermale
Assistant Commissioner
Office of Environmental Response
Dept. of Environmental Management
105 South Meridien Street
Indianapolis, IN 46225
Phone: 317-232-8603

STATE OF MICHIGAN

Roland Harmes, Director
Department of Natural Resources
Stevens T. Mason Building
P.O. Box 30028
Lansing, MI 48909
Phone: 517-373-2329

Thomas Martin, Deputy Director
Department of Natural Resources
Steven T. Mason Building
P.O. Box 30028
Lansing, MI 48909

517-373-2425

STATE OF MINNESOTA

Rodney W. Sando, Commissioner
Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Phone: 612-296-6591

Charles W. Williams, Commissioner
Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Phone: 612-296-7301

Contacts:

Rebecca Wooden, MDNR
Office of Planning

Phone: 612-297-3355
(resource damage assessments)

Lee Pfannmuller, MDNR
Fish and Wildlife Division

Phone: 612-296-0783

Gary Pulford, MPCA

Phone: 612-296-7290
(for CERCLA incidents)

Steve Lee, MPCA

Phone: 612-297-8610
(for OPA incidents)

STATE OF OHIO

Don Schregardus, Director
OEPA
P.O. Box 1049
1800 Watermark Drive
Columbus, OH 43266-0149

Phone: 614-644-3020

STATE OF WISCONSIN

Carroll D. Besadny, Secretary
Department of Natural Resources
101 South Webster Street
GEF 2
Madison, WI 53703

Phone: 608-266-2121

SECTION L: ANNEX 5 - INTERREGIONAL AGENCIES

Following is a list of major interregional agencies with active presences in Region V. Additional information concerning ORSANCO and UMRBA, including spill response procedures of these organizations, is also included in this annex.

A. BAY-LAKE REGIONAL PLANNING COMMISSION

Bay-Lake Regional Planning Commission
Old Fort Square, Suite 211
211 North Broadway
Green Bay, WI 54303-2757
(414) 448-2820

B. GREAT LAKES COMMISSION (GLC)

Great Lakes Commission
The Argus II Building
400 Fourth Street
Ann Arbor, MI 48103-4816
(313) 665-9135

C. INTERNATIONAL JOINT COMMISSION (IJC)

International Joint Commission
Great Lakes Regional Office
P.O. Box 32869
Detroit, Michigan 48232-2869
(313) 226-2170

D. OHIO RIVER VALLEY WATER SANITATION COMMISSION (ORSANCO)

ORSANCO
49 East Fourth Street
Cincinnati, OH 45202
(513) 421-1151

E. UPPER MISSISSIPPI RIVER BASIN ASSOCIATION (UMRBA)

UMRBA
415 Hamm Building
408 St. Peter Street
St. Paul, Minnesota 55102
(612) 224-2880

1 July 1992

Ohio River Water Sanitation Commission (ORSANCO)

Following is an excerpt from the ORSANCO Emergency Response Resource Manual.

In order to carry out its emergency responsibilities, the Commission has developed the following:

(1) 24-hour telephone coverage to receive spill reports.

(2) Daily receipt of river flow forecasts from NOAA.

(3) Directory of telephone numbers of emergency response agencies.

(4) Electronic bulletin board, which allows transmission of spill information via computer modem. A voice message line provides spill updates to those without computer capability.

(5) On-river monitoring capability, including boat, sampling gear, and instruments for field testing to allow the Commission to track a spill.

(6) Organics Detection System, which detects unreported spills and provides data on the effects of reported spills through regular (at least daily) monitoring for certain organic chemicals at 15 points along the Ohio River and its tributaries.

Spill response activities fall into two general categories: activities at the site and activities necessary downstream if the spill reaches a river. The former include initial reporting, containment and cleanup, protection of the public, and enforcement follow-up. Responsibilities for such actions are set forth in the spill contingency plans of U.S. EPA and the States. Actions necessary downstream of the spill require a great deal of coordination on the Ohio River, which serves as a boundary between the States and U.S. EPA regions for most of its length. This Plan, therefore, sets forth procedures for coordinating the actions of the various agencies involved.

Any spill of a hazardous substance reaching the Ohio River presents a potential threat to water supplies in several States. Special measures must therefore be taken to protect the public. At times, these measures take the form of "rumor control." When spill reports are passed on outside of the normal channels, they are often subject to distortion, resulting in unnecessary public concern. To prevent this from happening, notification procedures should be initiated in all of the following instances:

(1) Spills of hazardous substances;

(2) Spills of radioactive substances, including release of any material from nuclear plants;

(3) Transportation accidents;

(4) Fires and/or explosions at onshore facilities;

(5) By-passing at major treatment facilities;

(6) Detection of unusual conditions in a stream (e.g., by a water user; and

(7) Any incident covered by news media.

These guidelines should also apply to incidents on Ohio River tributaries. Decisions on whether to report a spill of questionable significance should be guided by the maxim: "When in doubt, report it."

Sampling should be undertaken to document precisely the threat to water supplies or the absence of such a threat. In order to provide timely and cost-effective results, the resources of the various agencies which are closest to the sampling points should be utilized. A typical Ohio River situation may call for sampling by two or more States, several water users, and U.S. EPA. These efforts must be coordinated to avoid duplication and conflicts.

Water users must receive consistent information. When water users on opposite sides of the river receive conflicting information as to the severity of a situation or treatment modification needed, or when one side is notified while the other is not, a great deal of confusion results.

The following responsibilities are assumed in this plan:

States: Determine need for treatment modification (including closing intake) by water users. Conduct sampling as necessary. Provide information to water users.

U.S. EPA: Provide information on toxicity. Provide sampling and/or analytical capability as needed.

ORSANCO: Provide estimates of in-stream concentration and time of travel. Assist States in coordination of sampling and information dissemination.

Notification procedures for an agency receiving a spill report are as follows:

U.S. EPA: Notifies U.S. EPA regions, State water pollution control agencies, State water supply agencies, USCG, ORSANCO.

State Water Pollution Control Agencies: Notifies U.S. EPA regions, State water supply agencies, ORSANCO, other immediately affected States, USCG.

State Water Supply Agencies: Notify State water pollution control agency, public water supplies, other water users.

ORSANCO: Notifies affected States, U.S. EPA regions, USCG, participants in Organics Detection System, other water users.

Local Agencies: Notify State response center, local officials.

Portions of these responsibilities are often delegated; e.g., a State usually delegates its responsibilities to notify other States to ORSANCO.

OHIO RIVER SPILL RESPONSE PROCEDURES

1. Initial Report

Initial spill reports will be received by the appropriate State agency in which the spill occurs and /or the appropriate Federal agency (U.S. EPA or USCG) as determined by State and Federal regulations. The appropriate State or Federal agency serves as the "initiating agency"

and is responsible for initiating response activities. Any other agency receiving a spill report will immediately notify the appropriate State and Federal agencies.

2. **Initial Response**

The agency receiving the report evaluates the information and determines the necessary response. If the incident is major, the Federal/State Regional Response Team will be activated. Minor incidents are handled by States alone. In activating response measures, the initiating agency should give priority notification to any immediately threatened water users. The initiating agency may delegate its responsibility to notify downstream and adjacent States to ORSANCO.

3. **On-Scene Response**

Procedures contained in the contingency plan of the responding agencies will be followed. Pre-designated Federal OSCs for the Ohio River are:

U.S. EPA Region III: Pennsylvania, West Virginia (including on-river spills).

USCG: Ohio, Indiana, Illinois.

U.S. EPA Region IV: Kentucky (including on-river spills).

When Federal participation is not indicated, the State in which the spill occurs provides the on-scene response. References to the OSC in the following sections mean the appropriate responsible party from a Federal or State agency.

4. **Notification of Downstream Water Users**

Upon receipt of a spill report, ORSANCO will evaluate its impact and notify adjacent and downstream States. The States are responsible for notifying the water users. ORSANCO will also notify downstream U.S. EPA regions.

The term "downstream States" is used in the following sections to refer to those States in which there are water users downstream of a spill. In many cases, the State in which the spill occurs is also a downstream State.

5. **Downstream Response**

The States will determine the need for treatment and modification by water users, based on toxicity data and expected concentration. To the extent possible, personnel from the affected States should communicate and attempt to provide uniform advice to water users. When monitoring is necessary, a coordinator should be designated from each State. ORSANCO will provide time-of-travel estimates and work with the State coordinators to set up an appropriate monitoring program utilizing State and ORSANCO Organics Detection System resources. U.S. EPA assistance in sampling or analyses may be requested, as needed.

6. **Continuing Coordination**

Sampling results will be reported to ORSANCO by the State contacts. ORSANCO will provide a minimum of daily updates to the State contacts. The information will include sampling results and revised time-of-travel estimates. River flows, together with three-day forecasts, are received at the Commission office each day between 1300 hours and 1400 hours. Daily updates to the States will therefore be provided between 1400 hours and 1500 hours.

When the Organics Detection System is activated, ORSANCO will be responsible for communications with the participating utilities. ORSANCO will also maintain contact with the OSC or the OSC's agency.

7. **Public Information**

Press releases will be coordinated with affected States and the OSC. The affected States and ORSANCO will release information only on the in-stream effects of the spill and related response actions. Inquiries concerning the spill itself will be referred to the OSC or other person as designated.

8. **Incident Closure and Reports**

When results of sample analysis indicate that no further threat to water supplies exists, sampling will be terminated. Final verbal reports will be given to water users. ORSANCO will compile information on each agency's participation in the sampling program, as well as treatment modification by water users, for inclusion in an incident report. This report will be submitted to the OSC as soon as possible after the incident for documentation in any cost-recovery action.

<u>Upper Mississippi River Basin Association (UMRBA)</u>

Following is an excerpt from the Response Plan and Manual, describing interstate notification procedures for spills to the Upper Mississippi River.

INTERSTATE NOTIFICATION PROTOCOL FOR SPILLS TO THE UPPER MISSISSIPPI RIVER

1. **Initial**

It is the responsibility of the State which first becomes aware of a spill to the Upper Mississippi River to notify other potentially affected States and appropriate Federal agencies. A State is to consider itself as first-aware if it has not previously been notified of the spill according to this protocol.

a. <u>All spills are to be reported.</u>

Notifications of spills likely to impact adjoining States are to be reported by voice immediately.

Notification of minor spills or spills that are far upstream of the recipient should be made during first available working hours by FAX or by voice. The first-aware State should use its best judgment as to what is a minor spill. News interest/coverage may make an otherwise environmentally insignificant spill into one which other States and Federal agencies should be made aware of. As guidance, the Coast Guard usually considers spills of less than 1,000 gallons of oil a minor spill.

b. Each State is responsible for its own intrastate notifications.

c. Should a Federal agency become first aware of a spill, it is to notify the State where the spill occurred (if known) or the State being impacted. That State will then be responsible for notifications according to this protocol.

d. FAX notifications and notification supplements should use the emergency transmittal cover sheet followed by the originating agency's incident/release/spill report form. Additional information, maps, etc., should be included as necessary and available.

2. **Updates**

Daily updates will be made to adjacent and downstream States by the designated coordinating State if the response is State-lead, or by the Federal OSC if the response is Federalized. It is suggested that daily updates be FAXed at 1330 hours, although urgent information should be sent on immediately.

a. When the spill occurs in or affects the river at a boundary between two States, these States will decide during initial notification as to which State will be the designated coordinating State.

b. When a spill originates within a State, that State will be the designated coordinating State unless another State agrees to take over that responsibility (e.g. perhaps because of the greater involvement by the second State in the spill response).

c. The designated coordinating State or Federal OSC is responsible for an incident termination notice when spill response and monitoring efforts cease.

d. A State or Federal agency which responds in any way to a spill is to update the designated coordinating State or Federal OSC on its activity and findings daily so that this information can be disseminated. It is suggested that these reports be FAXed prior to 1200 hours daily. The reports should contain a summary of all activity by that State/agency since its last report, including lab analyses and maps if appropriate. The reports should also contain what future actions that State or agency plans to undertake.

e. A Federal OSC may negotiate with a State to assume its obligations to provide daily updates if the Federal OSC maintains close communications and provides the necessary information to that designated coordinating State.

3. **Applicability** 1 July 1992

This notification protocol applies to those agencies which sign an implementing memorandum of understanding.

a. Each State will be represented by only one contact agency who will represent and assume the "State" role for purposes of this protocol. It is assumed that his agency will be one which is responsible for environmental emergency response to a spill on the Upper Mississippi River.

b. Each Federal agency will be represented by only one contact point per Federal agency for purposes of receiving notifications and updates.

SECTION M: ANNEX 6 - CURRENT USFWS POLLUTION FIELD RESPONSE COORDINATORS

ILLINOIS

Jody Millar
U.S. Fish and Wildlife Service
4469 48th Avenue Court
Rock Island, IL 61201

FTS 782-5800
Comm. 309-793-5800
Res. 319-289-4517
FAX 309-793-5804

Tracy Copeland
Alternate FRC
U.S. Fish and Wildlife Service
4469 48th Avenue Court
Rock Island, IL 61201

FTS 782-5800
Comm. 309-793-5800
Res. 319-792-0610
FAX 309-793-5804

SOUTHERN ILLINOIS

Thomas Groutage
U.S. Fish and Wildlife Service
Route 3, Box 328
Marion, IL 62959

Phone: 618-997-5491
Res. 618-985-4004
FAX 618-331-9356/5491

Andrew French
U.S. Fish and Wildlife Service
Illinois River Wildlife and Fish Refuge
RR #2,Box 61B
Havana, IL 62644

Phone: 309-535-2290
Res. 309-543-4386

Karen L. Drews
U.S. Fish and Wildlife Service
Mark Twain National Wildlife Refuge
HCR, Box 107
Brussels, IL 62013-9711

FTS 618-380-7524
Comm. 618-883-2524
Res. 618-396-2583

INDIANA

Daniel Sparks
U.S. Fish and Wildlife Service
718 North Walnut Street
Bloomington, IN 47404

FTS 332-4261
Comm. 812-334-4261
Res. 812-336-4341
FAX FTS-332-4273

David C. Hudak
Alternate FRC
U.S. Fish and Wildlife Service
718 North Walnut Street
Bloomington, IN 47404

FTS 332-4261
Comm. 812-334-4261
Res. 812-824-2227
FAX FTS-332-4273

MICHIGAN

Timothy Kubiak
U.S. Fish and Wildlife Service
302 Manly Miles Building
1405 South Harrison Road
East Lansing, MI 48823

FTS 337-6650
Comm. 517-337-6650
Res. 517-669-1275
FAX 517-337-6899

Leonard Schuman
Alternate FRC
U.S. Fish and Wildlife Service
Wildlife Assistance Office
310 Manly Miles Building
1405 South Harrison Road
East Lansing, MI 48823

FTS 517-337-6713
Comm. 517-337-6713
Res. 517-669-3829

UPPER PENINSULA MICHIGAN

Michael Tansy
U.S. Fish and Wildlife Service
Seney National Wildlife Refuge
Seney, MI 49883

FTS 371-2851
Comm. 906-586-3054
Res. 906-586-3144
FAX 906-586-3800

MINNESOTA

Stanley Smith
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Res. 612-439-2474
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Robert Dahlgren
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Upper Mississippi River Refuge
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425 State Street, P.O. Box 2434
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Scott Yess
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51 East 4th Street, Room 101
Winona, MN 55987

FTS 507-380-9232
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Res. 507-452-8558

OHIO

Bill Kurey
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Res. 419-898-1880

WISCONSIN

Kenneth Stromberg
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Green Bay, WI 54311

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Tom Bushiahn
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SECTION N: ANNEX 7 - STATE HISTORIC PRESERVATION OFFICERS IN REGION V

INTRODUCTION

Each State, Territory, and the District of Columbia, has a State Historic Preservation Officer (SHPO). The SHPO can provide many important services to local governments and historic preservation commissions. The National Historic Preservation Act establishes certain SHPO responsibilities. These include the following:

1) Ensuring comprehensive Statewide historic preservation planning;

2) Conducting a Statewide survey to identify historic properties;

3) Nominating properties to the National Register of Historic Places;

4) Assisting local governments in developing historic preservation programs and in becoming certified to participate in the national program;

5) Advising and assisting in Federal, State, and local historic preservation projects;

6) Participating in review of Federal, State, and local undertakings that may affect historic properties; and

7) Providing public information, education, training, and technical assistance in historic preservation.

Under National Park Service (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:

1) Conduct preservation conferences and workshops;

2) Distribute State grants and loans for preservation;

3) Maintain and interpret State-owned historic properties;

4) Conduct programs to acquire and administer historic preservation easements;

5) Administer State legislation to protect historic properties from non-Federal construction and land-use projects;

6) Administer State legislation relating to archeological resources, shipwrecks, and other special kinds of historic properties;

7) Publish newsletters, scholarly publications, and popular books and brochures;

8) Administer State history museums and conservation laboratories;

9) Develop and support State and local preservation statutes;

10) Help State and local authorities use preservation in primary and secondary curricula, and in public education generally; and

11) Provide technical assistance to owners of historic properties.

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 and history office, a planning department, a conservation department, a parks and recreation department, a State historical society, or a State museum.

Under NPS regulations, each SHPO must be assisted by a staff of appropriate preservation officials, in most cases including historians, architectural historians, historical architects, and archeologists. Many SHPOs are also assisted by academic institutions, historical and archeological societies, and other preservation-oriented groups through contracts or cooperative agreements.

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.

SHPOS IN REGION V

ILLINOIS

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Illinois Historic Preservation Agency
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217-785-1153
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Theodore Hild, Deputy SHPO
Chief of Staff
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INDIANA

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Indianapolis, IN 46204

317-232-4020
FAX: 317-232-8036

Dr. James Glass, Deputy SHPO
Division of Historic Preservation
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317-232-1646
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MICHIGAN

Dr. Kathryn Eckert, SHPO
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MINNESOTA

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612-296-2747
FAX: 612-296-1004

OHIO

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The Ohio Historical Society
Historic Preservation Division
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Columbus, OH 43211

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WISCONSIN

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State Historical Society of Wisconsin
816 State Street
Madison, WI 53706

608-264-6500
FAX: 608-264-6404

SECTION O: ANNEX 8 - NATURAL HERITAGE/NATURAL FEATURES INVENTORIES

NATURAL HERITAGE PROGRAMS

Following is a list of locations of Nature Conservancy-sponsored inventories of "species of concern". Some inventories are in computer format; others are hard copy only. Data can be FAXed in an emergency. The staff are not response personnel and are available during business hours only:

Indiana - Indianapolis	(317) 232-4052
Michigan - Lansing	(517) 373-1552/9338
Minnesota - St. Paul	(612) 296-4284
Ohio - Columbus	(614) 265-6453
Wisconsin - Madison	(608) 266-0924

In Illinois, the Illinois Department of Conservation maintains a natural heritage inventory system. At present, the location information consists of hand-labeled topographical maps. Efforts are underway to input this information to a GIS system so that publication-quality maps can be more readily reproduced. Emergency contact: IEPA (217) 782-3637.

SECTION P: ANNEX 9 - INFORMATION TO PROVIDE IN REPORTS OF SPILLS/RELEASES

To the extent possible, when a spill or release is reported, the following information should be provided:

1. Name, address, and telephone number of the reporting individual;
2. Name of the party or individual responsible for the incident;
3. Mailing address of the responsible party or parties;
4. Telephone number of the responsible party or parties;
5. Date and time that the incident occurred or was discovered;
6. Address and specific geographic location of the incident and identification of any waters into which spill or release occurred;
7. Material spilled or released (trade name, chemical name, chemical composition, state of material);
8. Source of the spilled material;
9. Cause of the release;
10. Total quantity released;
11. Whether the material was released to air, ground, water, or subsurface;
12. Amount spilled into water;
13. Weather conditions;
14. Vessel name, rail car/truck number, or other identifying information;
15. Name of carrier;
16. Number and type of any injuries or fatalities;
17. Whether evacuations have occurred;
18. Description of cleanup action taken and plans for future action;
19. Other agencies that have been notified or will be immediately notified;

20. Any known or anticipated acute or chronic health risks that are associated with the emergency, and, where appropriate, advice regarding medical attention necessary for exposed individuals;

21. Proper precautions to take as a result of the release, including evacuation;

22. Who can be contacted for further information;

23. Natural resources which may be affected;

24. Land owner (Federal/State/local governmental/private);

25. Estimated dollar amount of property damage.

Additionally, SARA Title III requires that, following a release which required CERCLA notice, the owner/operator shall provide a written follow-up emergency notice. The written notice shall address the following:

a. Actions taken to respond to and contain the release;

b. Known or anticipated acute or chronic health risks associated with the release;

c. Advice regarding medical attention necessary for exposed individuals, as appropriate.

All such notices necessitated by Title III must be submitted to the LEPC and the SERC. Additional information concerning State notification procedures is presented in Annex 14.

SECTION Q: ANNEX 10 - REGION V CHEMICAL USE CHECKLIST

A. COMPILE DATA

RESPONSIBILITY

1. Spill Data — OSC

-circumstances
- time/date of incident
-location
-type of oil product
-volume of product released
-total potential of release
-type of release (instantaneous, continuous, etc.)

2. Characteristics of Spilled Oils — OSC

-specific gravity
-viscosity

3. Weather and Water Conditions/Forecasts — SSC

-air temperature, wind speed, direction
-water conditions
-water temperature
-water depth

4. Oil Trajectory Information — SSC

-48-hour surface oil trajectory forecast
  -surface area of slick
  -expected conditions of landfall

-48-hour dispersed or chemically treated oil trajectory forecast
  -oil movement in water column
  -surface oil movement and expected landfall
  -concentration of the dispersant/oil mixture in the water column

5. Chemical Characteristics and Application Equipment

CHEMICAL CHARACTERISTICS

	Product 1	Product 2	Product 3
Chemical Name Trade Name Manufacturer When Available Location Characteristics: --toxicity --effectiveness --reactions --applicability --flash point Amount Available Type of Containers Application Methods Benefits to Problem (e.g. reduce vapor, increase viscosity)			

TRANSPORTATION AND EQUIPMENT

	Company 1	Company 2	Company 3
Name Location Equipment Available Transportation of Equipment			

6. Comparison of the Effectiveness of Conventional Clean Methods vs. Use of Chemicals — U.S. EPA, USCG OSC SSC, STATE(S)

-containment at the source
-burning
-shoreline protection strategies
-shoreline cleanup strategies
-time necessary to execute response

7. Habitats and Resources at Risk — OSC, SSC

-shoreline habitat type and area of impact
-resources
  -endangered/threatened species
  -critical habitat for the above species
  -waterfowl use
  -shellfish
  -finfish
  -commercial use
  -public use areas
  -other resources of significance

8. Other Users of the Water: Nearby and Downstream — OSC

-water supply, potable
-water supply, industrial

B. RECOMMENDATIONS — U.S. EPA, USCG OSC SSC, STATE(S)

1. Possible Options
-do not use chemicals
-use chemicals on a trial basis
-disperse or chemically treat in limited defined areas
-disperse or chemically treat to maximum extent possible with accepted methods and available equipment

2. Other Recommendations/Rationale

C. EVALUATION OF DECISION — U.S. EPA, USCG OSC SSC, STATE(S)

1. Will application remove a significant amount of the slick from the surface water?

2. Can the extent or location of shoreline impacts be altered in a positive manner?

3. Can the damage to endangered/threatened species, mammals, and waterfowl be lessened?

4. Will the damage to habitats and resources resulting from the chemical use be less than those resulting without the use?

5. If recreational, economic, and aesthetic considerations are a higher priority than natural resource considerations, what is the most effective means of their protection?

D. MONITORING OF CHEMICAL USE

1. Records

-chemical brand
-Equipment and methods used in application
-dilution of chemical prior to application, if any
-rate of application
-times and area of application
-wind and wave conditions during application

2. Effectiveness - visual and photographic documentation

-oil before and after chemical application
-resurfacing of dispersed or chemically treated oil
-sampling of the water beneath the oil slick and the oil/chemical combination to determine the level of petroleum hydrocarbons in the water

3. Environmental Impacts - visual and photographic surveys

-the extent of shoreline impact by chemically treated and untreated oil
-mortality or abnormal behavior of fish, birds, or mammals
-comparison of shoreline areas impacted by oil and oil/chemical mixtures
-analysis of oil concentrations in sediments under chemically treated oil
-investigation of water column organisms for signs of adverse impact due to chemically treated oil
-collection and analysis of birds affected by chemicals or oil/chemical mixture

4. Public Health

-Sampling water supplies for petroleum and chemical constituents

SECTION R: ANNEX 11 - U.S. EPA MEMORANDUM OF UNDERSTANDING

Date: 11/21/85

MEMORANDUM

Subj: CERCLA Funding of RRT Members' Travel Costs to RRT Meetings

From: Henry L. Longest II, Director
Office of Emergency and Remedial Response

To: Regional Response Team Co-Chairmen

At the NRT/RRT Co-Chairs meeting in September 1984, RRT Co-Chairs raised the question of our policy regarding funding RRT members' (Federal, State, and local) travel and per diem costs for attending RRT meetings. EPA agreed to consult counsel and develop a policy on the matter. A draft policy was developed last fall and supported by the NRT at its November 29, 1984 meeting. However, the NRT suggested that the two fund managers, EPA for the Hazardous Substance Response Trust Fund ("Superfund") and the U.S. Coast Guard for the fund authorized by Section 311(k) of the Clean Water Act, issue separate policies based on the legal requirements for the respective funds. The Coast Guard has clarified the policy on this matter for the 311(k) fund in the upcoming revision of the Marine Safety Manual. With the Coast Guard's permission, I have attached for your information the excerpt of the manual covering this policy. EPA's counterpart policy for the Superfund is as follows:

Standing RRT Meetings

Federal. Travel and per diem costs for Federal agency representatives to attend standing RRT meetings is available under section 111(c)(5) of CERCLA. Federal agencies wishing to avail themselves of this possibility should request funding through the annual interagency CERCLA budget process. In cases where such funding is not available and the agencies have no other funding available for this purpose, either RRT Co-Chairman may, based on the need for that agency's presence at the meeting and the exigencies of the situation, provide funding from his/her agency's CERCLA travel budget through the mechanism of invitational travel. Written justification for the record for such funding must be provided by the RRT Co-Chairman.

State/Local. Travel and per diem costs for State and local government members of the RRT and other appropriate representatives of the State and local government is allowable under the reasonable administrative costs and expenses clause of section 111 (a) of CERCLA, provided that either RRT Co-Chairman determines that the attendance of each such representative is for the primary benefit of the Federal government. The routine and regular payment of such travel and per diem costs is not recommended. Based on the need for each representative's presence at the meeting and the exigencies

of the situation, either RRT Co-Chairman may provide funding through the mechanism of invitational travel. Written justification for the record for such funding must be provided by the RRT Co-Chairman.

Incident-Specific RRT Meetings

For incident-specific RRT meetings travel and per diem costs for Federal, State, and local RRT members and other appropriate government representatives are allowable under section 111(a)(1) of CERCLA. Based on the need for each representative's presence at the meeting and the exigencies of the situation, either RRT Co-Chairman may provide funding from his/her agency's CERCLA travel budget through the mechanism of invitational travel. Written justification for the record for such funding must be provided by the RRT Co-chairman.

Please contact David Speights at (FTS-382-4492) if you have any questions regarding this policy.

Attachment

cc: Captain Charles Corbett
National Response Team
EPA Regional Waste Management Division Directors

SECTION S: ANNEX 12 - RRT CONTINGENCY PLAN EVALUATION CRITERIA

The purpose of the matrix presented in this annex is to indicate suggested areas for review by the respective members of the RRTs, in accordance with NRT-1A. The Regional Response Team membership has considerable interests and expertise in various aspects of emergency response through the NCP. The RRT also may provide assistance to State and local governments in preparedness, planning, and training in hazardous materials and may review hazardous materials plans prepared and submitted by LEPCs in accordance with Section 303(g) of SARA Title III.

The following matrix indicates review criteria for which each member may be responsible, and is submitted as a basis for the RRTs to review and comment. In the interest of brevity, each Federal agency has been assigned an alpha code. We have attempted to assign evaluation criteria based on subject matter expertise.

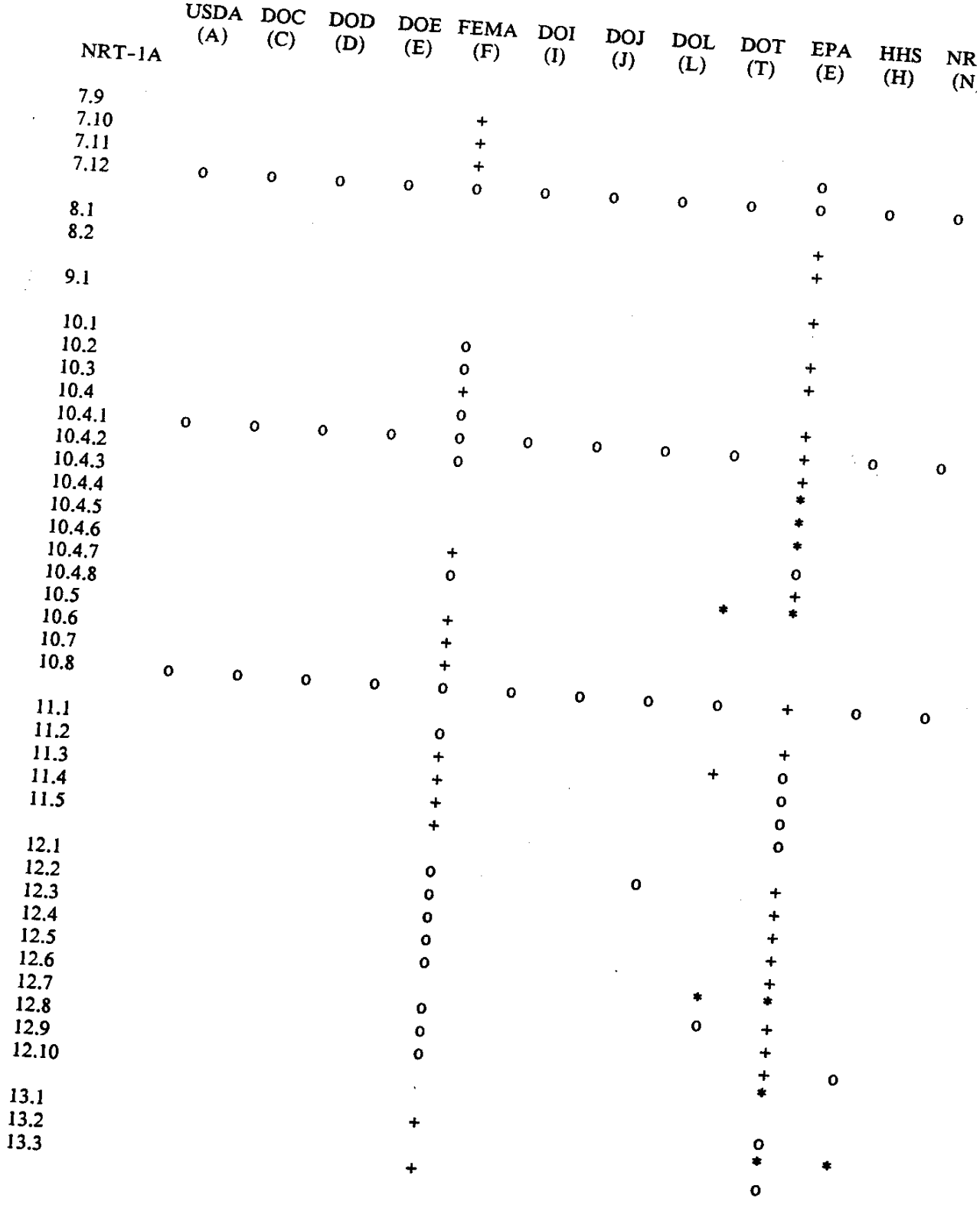
FEDERAL AGENCY	CODE
United States Department of Agriculture	A
Department of Commerce	C
Department of Defense (DOD)	D
Department of Energy (DOE)	E
Federal Emergency Management Agency (FEMA)	F
Department of Interior (DOI)	I
Department of Justice (DOJ)	J
Department of Labor (DOL)	L
Department of Transportation (DOT)	T
Environmental Protection Agency (EPA)	P
Health and Human Services (HHS)	H
Nuclear Regulatory Commission (NRC)*	N

* The Nuclear Regulatory Commission review concerns the consistency and coordination of emergency response plans prepared under Title III and emergency response plans prepared for the purpose of licensing nuclear power plants.

NRT-1A ELEMENT REVIEW RESPONSIBILITIES[2]

NRT-1A	USDA (A)	DOC (C)	DOD (D)	DOE (E)	FEMA (F)	DOI (I)	DOJ (J)	DOL (L)	DOT (T)	EPA (P)	HHS (H)	NRC (N)
1.1										*		
2.1					+					*		
2.2										*		
2.3					o					+		
2.4										*		
3.1					+							
3.2										o		
4.1					+							
5.1	o	o	o	o	o	o	o	o	o	+	o	o
6.1	o	o	o	o	o	o	o	o	o	+	o	o
6.2								*	*	*		
6.3								*	*	*		
6.4								*	*	*		
6.5						*		*	*	*		
6.6									*	*		
6.6.1						*		*	*	*		
6.6.2						*		*	*	*		
6.6.3						*		*	*	*	*	
6.7	*	*				*			*			
6.8		*										
6.9		*										
6.10		*										
7.1					+				o	o		
7.2					+				o	o		
7.3					+			o		o		
7.4					+			+		o		
7.5					o					o		
7.6					+			o		+		
7.7					o					o		
7.8					+							

[2] + Primary Agency
o Secondary Agency
* Agency primary or secondary role not identified


NRT-1A
USDA (A)
DOC (C)
DOD (D)
DOE (E)
FEMA (F)
DOI (I)
DOJ (J)
DOL (L)
DOT (T)
EPA (E)
HHS (H)
NR (N
7.9
7.10
7.11
7.12
8.1
8.2
9.1
10.1
10.2
10.3
10.4
10.4.1
10.4.2
10.4.3
10.4.4
10.4.5
10.4.6
10.4.7
10.4.8
10.5
10.6
10.7
10.8
11.1
11.2
11.3
11.4
11.5
12.1
12.2
12.3
12.4
12.5
12.6
12.7
12.8
12.9
12.10
13.1
13.2
13.3

NRT-1A	USDA (A)	DOC (C)	DOD (D)	DOE (E)	FEMA (F)	DOI (I)	DOJ (J)	DOL (L)	DOT (T)	EPA (P)	HHS (H)	NRC (N)
13.4					+					o		
14.1					+					o		
14.1.1					+					o		
14.1.2					+		o			o		
14.1.3					+					o		
14.2					+					o		
14.3					+					o	o	
15.1	o				+			o		o	o	
15.2	o				+			o		o	o	
15.3	o				+			o		o	o	
15.4	o				+					o	o	
16.1					o				o	+	o	
16.2					o			o		+		
16.3	o		o		o			o	o	+	o	
16.4									o	+	o	
16.5					o				o	+		
16.6								*		*	*	
16.7	o	o	o	o	+	o	o	o	o	o	o	o
16.8					+					o		
16.9					o			o	o	+		
17.1								*		*	*	
17.2											*	
17.3											*	
17.4										*	*	
17.5										+	o	
17.6								*			*	
17.7								*		*	*	
17.8											*	
17.9											*	
18.1								*		*	*	
18.2								*		*		
18.3								*		*	*	
19.1								*	*	*		
19.2										*		
19.3	o				+					o	o	
19.4	o				+					o	o	
19.5	o				+					o	o	
19.6	o				+					o	o	
19.7	o				+					o	o	
20.1					o				+	o		

NRT-1A	USDA (A)	DOC (C)	DOD (D)	DOE (E)	FEMA (F)	DOI (I)	DOJ (J)	DOL (L)	DOT (T)	EPA (P)	HHS (H)	NRC (N)
20.2					o					+		
20.3					+					o	o	
20.4					o			o		+		
20.5					+						o	
20.6					+							
20.7					o					+		
20.8					o				+			
20.9					o				+	o		
20.10					+						o	
20.11					+							
20.12					+		o		o			
20.13					o				+			
20.14					+							
21.1	o				+				o			
21.2	o				+				o			
21.3					+							
21.4					o				o	+	o	
21.5					+				o	o	o	
22.1					o			+	o	o	o	
22.2					o			+	o	o	o	
22.3					o					+	o	
23.1												
23.2	*					*					*	
23.3	*										*	
23.4	*									*	*	
24.1					+						+	
24.2					*						*	
25.1					o				o		+	
25.2					o				o		+	
26.1	*					*			*		*	
26.2	*					*			*	*	*	
26.3	*					*			*	*	*	
26.4	*					*			*	*	*	
26.5	*					*			*	*	*	
26.6	*					*			*	*	*	
26.7	*					*			*	*	*	
26.8									*		*	
26.9						*			*	*	*	
26.10	*					*			*	*	*	
27.1										+		

	USDA (A)	DOC (C)	DOD (D)	DOE (E)	FEMA (F)	DOI (I)	DOJ (J)	DOL (L)	DOT (T)	EPA (P)	HHS (H)	NRC (N)
NRT-1A							*			+		
										+		
27.2												
27.3								o	o	o		
					+			o	o	o		
28.1					+			o	o	o		
28.2					+			o	o	o		
28.3					+			o	o	o		
28.4					+			o	o	o		
28.5					+							
28.6								o	o	o		
					+			o	o	o		
29.1					+			o	o	o		
29.2					+			o	o	o		
29.3					+			o	o	o		
29.4					+							
29.5												

28 May 1992

SECTION T: ANNEX 13 - USCG/U.S. EPA INSTRUMENT OF REDELEGATION

From: Commandant
To: Distribution

Subj: USCG/EPA INSTRUMENT OF REDELEGATION

Ref: (a) Executive Order 12580 dtd 23 January 1987

1. Enclosure (1) to this letter is the new Instrument of Redelegation between the U.S. Coast Guard and the U.S. Environmental Protection Agency (U.S. EPA). This replaces the old Instrument of Redelegation previously signed by the USCG and EPA in October 1981.

2. The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) was amended by the Superfund Amendments and Reauthorization Act (SARA), which was enacted on October 17, 1986. President Reagan signed Executive Order 12580 on January 23, 1987, assigning responsibility for functions under CERCLA, as amended by SARA. Enclosure (2) pertains to specific sections of CERCLA that outline the specific functions referred to in Enclosure (1).

3. When CERCLA was amended by SARA in 1986, the USCG and other federal agencies were tasked with certain regulatory functions in carrying out the environmental specifics of the two Acts. There was a subsequent "redelegation" of duties and responsibilities drawn up between the EPA and the USCG. This Instrument of Redelegation gave very specific guidelines as to what each agency (EPA and USCG) is responsible for under Executive Order 12580, Enclosure (3). The new Instrument of Redelegation changes very little from the previous Instrument of Redelegation.

4. Familiarization with the USCG/EPA Instrument of Redelegation (1988) should facilitate the understanding of forthcoming internal Coast Guard policy guidance in this area. This will be in the form of COMDTNOTE 16465 entitled "Delegation of Response Authority under CERCLA as amended by SARA", and presently scheduled for field distribution within the next two months. For additional information contact LCDR Epler or LT Williamson (G-MER-2) of my staff.

R. M. Larrabee

28 May 1992

INSTRUMENT OF REDELEGATION

1. Except as provided in paragraph 2 below, in accordance with Section 11(g) of Executive Order 12580 of January 23, 1987, the Secretary of the Department in which the Coast guard is operating hereby delegates to the Administrator, Environmental Protection Agency (EPA), subject to the Administrator's consent:

   a. All functions specified in Sections 2(f), 4(c), and 5(b) of that Executive Order; and
   b. The functions specified in Sections 2(i), 2(j)2, 2(k), and 6(c) of that Executive Order to the extent that those functions relate to the functions specified in Section 2(f) of that Executive Order.

2. The Functions redelegated under this Instrument of Redelegation do not include:

   a. Functions related to responses to releases or threats of releases from vessels;
   b. Functions related to emergency action concerning releases or threats of releases at facilities other than active or inactive "hazardous waste management facilities" (as defined in 40 CFR 270.2); and
   c. Functions related to emergency action concerning releases or threats of releases at active or inactive "hazardous waste management facilities" when the Coast Guard On-Scene Coordinator (OSC) determines that such action must be taken pending arrival on scene of an EPA OSC. Unless otherwise agreed upon by the EPA and Coast Guard, this authority will not be exercised unless the EPA OSC is scheduled to arrive on scene within 48 hours of notification of the release or threat of release.

3. For purposes of this Instrument, the term "emergency action" includes any removal action which, in the view of the Coast Guard OSC, must be taken immediately to prevent or mitigate immediate and significant danger to the public health, welfare, or the environment. Situations in which such actions may be taken include, but are not limited to, fire, explosions, and other sudden releases; human, animal, or food chain exposure to acutely toxic substance, and the contamination of a drinking water supply.

4. All functions described in this document, whether redelegated or retained, include the authority to contract for, obligate monies for, and otherwise arrange for and coordinate the responses included within such functions.

SECTION U: ANNEX 14 - STATE EMERGENCY INFORMATION

A. ILLINOIS

The Emergency Response Unit (ERU) works within the state response system, in which the Illinois Emergency Management Agency (IEMA) serves as the central receiving and dispatching point for response to any emergency or disaster requiring state notification or involvement. IEPA responsibility involves response to:

(1) Oil and chemical spills on water or land;

(2) Releases of harmful quantities of toxic substances into the atmosphere;

(3) Emergencies involving public water supplies;

(4) Emergencies involving wastewater treatment systems;

(5) Emergencies involving solid waste disposal sites;

(6) Fish kills caused by pollutants;

(7) Emergency disposal or treatment of hazardous materials;

(8) Abandoned hazardous waste incidents posing immediate hazards;

(9) Transportation incidents involving hazardous materials which pose an immediate threat of a release.

ERU operates from IEPA's headquarters in Springfield, Illinois, during normal working hours, supplemented by an on-call duty officer to cover periods after normal working hours and during weekends and holidays. Incident coordination, management, and response personnel operate from the Springfield office which is centrally located geographically. In addition, ERU has full-time response personnel in IEPA's Maywood (Chicago-area) office and in its Collinsville (St. Louis east-area) office. After hours and during weekends and holidays, ERU maintains emergency response specialists on-call from its Maywood, Springfield, and Collinsville offices to assist the Duty Officer and to provide on-scene response. In addition, personnel from IEPA's regional or district field offices representing one of IEPA's pollution control divisions (Air, Land, Water, or Public Water Supplies) are often called upon to conduct the necessary field response consistent with their capabilities.

ERU assistance consists of:

(1) Providing technical information regarding identification, chemical and physical properties, toxicity data, and potential dangers associated with a hazardous material.

(2) Monitoring or sampling air, water, soil, waste and containers.

(3) Serving in an advisory capacity concerning:

(a) Containment of the material;

(b) Restoration of the environment, including setting emergency cleanup objectives;

(c) Evacuation recommendations; and

(d) Disposal or treatment of hazardous material or debris resulting from the emergency.

(4) Providing oversight and ensuring completeness of cleanup actions taken by responsible parties.

(5) Acting as OSC during State-financed emergency cleanups.

(6) Providing notice to users of affected water and land. Such notices may be communicated through other state and local agencies involved.

(7) Providing professional and technical assistance, personnel, and equipment to directly assist public safety officials within the scope of IEPA's responsibilities and resources.

(8) Documenting violations of the Illinois Environmental Protection Act for potential legal action.

(9) Expediting the issuance of waste treatment, storage or disposal permits by and through IEPA's Land Pollution Control Division, usually in less than 24 hours; as well as authorizing emergency exemptions for the transportation, storage, and disposal of special wastes.

IEPA utilizes commercial response contractors when it uses State funds to mitigate and remediate incidents. The ability to use State funds is limited to situations involving CERCLA Hazardous Substances and does not include petroleum products (oil) unless the release is from a UST. IEPA currently has contracts annually with commercial response contractors for emergency response and mitigation (two contractors), emergency incident waste disposal (one contractor), emergency lab pack response (one contractor), and leaking UST response (four remediation and two oversight contractors). (Note: Contract data is for 1990-1991 and may vary.)

NOTIFICATION PROCEDURES

A release is usually defined as "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment" in the various laws and regulations which require immediate or expeditious reporting of releases. In general, it includes on-site loss of containment, as well as releases which go beyond facility boundaries. Following is a list of the sources of those reporting requirements and a brief description of what is to be reported, how soon, and to whom.

1. CERCLA (42 U.S.C 9601, et seq.), Section 103(a) - any release equal to or greater than a reportable quantity of a "hazardous substance" (the CERCLA list, and also published in Table 302.4 of 40 CFR 302, dated July 1, 1987) from a vessel or an onshore or offshore facility, immediately to the National Response Center (NRC) at 1-800-424-8802).

2. 40 CFR 110.9 (Oil Pollution) - any "discharge" (essentially defined as the "release") of oil from a vessel or an onshore or offshore facility into navigable waters of the United States,

immediately to the NRC.

3. SARA, Title III, Section 304 - any release equal to or greater than a reportable quantity of a "hazardous substance" or an "extremely hazardous substance" (Appendix A of CFR 355 dated April 22, 1987) from a facility, or related to transportation, immediately to 1) the State Emergency Response Commission, the Illinois Emergency Management Agency (IEMA) in Illinois, at 1-800-782-7860 or 1-217-782-7860; and 2) the community emergency coordinator of the local emergency planning committee (the designated person in each county and the City of Chicago who coordinates emergency response operations). Phone numbers may be obtained by calling IEMA at 217-524-6887 or 217-782-4694.

4. 35 Ill. Adm. Code 723.130(c) (Illinois Hazardous Waste Regulations) - any "discharge" of a "hazardous waste" (the CERCLA list) by an air, rail, highway, or water transporter (no time frame given), to the NRC and IEMA.

5. 29 Ill. Adm. Code part 430 (Emergency and Written Notification of an Incident or Accident Involving a Reportable Hazardous Substance) - Any release equal to or greater than a reportable quantity of a "hazardous substance," or an "extremely hazardous substance," immediately to IEMA and the community emergency coordinator of the local emergency planning committee and any incident or accident involving a "hazardous material" (any substance or material so designated pursuant to the Hazardous Materials Transportation Act, 49 U.S.C.A. 1801 et seq.) which results in 1) death, hospitalization, or evacuation of a member or members of the general public, 2) overturn of a motor vehicle on a public highway, 3) fire, breakage, release, or suspected contamination involving an etiologic (disease-causing) agent, or 4) any release of oil which meets the reporting requirements in 40 CFR 110, immediately to IEMA.

The preceding list of reporting requirements is necessarily simplified. You are encouraged to refer to the documents cited for more detail. These documents are available upon request by writing or calling: Illinois EPA, Office of Chemical Safety, #29, 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62794-9276.

The information to be reported is as follows:

IMMEDIATE NOTIFICATION

1. The chemical name or identity of any substance involved in the release;

2. An indication of whether or not the substance is on the list of extremely hazardous substances;

3. An estimate of the quantity in pounds of any substance that was released into the environment;

4. The time and duration of the release;

5. The specific location of the release;

6. The medium or media (air, water, land) into which the release occurred;

7. Proper precautions to take as a result of the release, including evacuation (unless such

information is readily available to the community emergency coordinator pursuant to the emergency plan);

8. Any known or anticipated acute or chronic health risks or public safety risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals; and

9. Name of the reporter and phone number where the reporter may be contacted, as well as the name and telephone numbers of a person or persons to be contacted for further information.

WRITTEN FOLLOW-UP NOTIFICATION

As soon as practicable after the occurrence of the release, incident, or accident, the following shall be provided:

1. An update of the information provided in the immediate notification; and

2. Actions to be taken to respond to and contain any release.

B. INDIANA

In an effort to enforce Rule 327 IAC 2-6, staff of IDEM's Emergency Response Section (ERS) are prepared to respond to environmental emergencies 24 hours a day. During the work week, the 24-hour emergency number (317-241-4336) is routed directly to the ERS office located on Bradbury Avenue in Indianapolis. During that time, the phone number is monitored by ERS staff.

During the evenings, weekends, and holidays, the Indiana State Board of Health (ISBH) answers the 24-hour number. Should a phone call require an emergency response, the ISBH representative, through a prepared roster, notifies the ERS staff on call and gives the responder the phone message, name, and telephone number of the caller. The responder then returns the call to the originator, obtains relevant information, and if necessary initiates a response.

In addition to providing an OSC, ERS staff, with the occasional assistance of the four IDEM program offices (Air, Water, Environmental Response, and Solid waste), can be expected to provide the following:

(1) 24-hour on-site investigation by staff who are trained in hazardous material spill containment and cleanup, stream monitoring, and hazardous waste disposal.

(2) Ensuring containment and cleanup by the spiller, including groundwater decontamination and treatment, if necessary.

(3) Monitoring and determining the movements of pollutants in water.

(4) Information and advice on the chemical characteristics and known effects of spilled or released materials.

(5) Warning and advising downstream water users, particularly public surface water suppliers (determining the time of arrival at intake, and time to pass the intake).

(6) Field analytical capability for a limited range of chemicals and state laboratory capability for analysis of the full range of water pollutants.

(7) Advising the spiller of availability or nonavailability of suitable disposal sites within the State (if an adequate site is available) for the disposal of the recovered material.

(8) For major spills, providing a self-contained communications vehicle for agencies at the scene to meet and coordinate actions.

(9) Establishing, where possible, the cause and party responsible for a fish kill so that the Department of Natural Resources can recover the cost for restocking the fish.

(10) If the responsible party cannot be identified and substantial danger to the public health exists, allocating State cleanup funds or contacting and requesting U.S. EPA to initiate a cleanup.

EMERGENCY BURNING OF OIL SPILLS

The following IDEM staff, in the order of contact, have permission to process emergency burning of oil spills:

David Rice
Herman Carney
Woodard Smith

If these individuals are not present, the request should be forwarded to T. Method, Assistant Commissioner.

As in the past, input from the IDEM office that might be involved should be received and the appropriate form should be completed by the source, and returned to D. Rice. He should also receive a report from the individual who processes the request. Rice will supply the necessary form upon request.

C. MICHIGAN

In the event of an oil or other hazardous material incident, local government designates an incident commander, usually the highest ranking fire official at the scene. This person directs activities relating to the immediate incident response through a command post. If the incident escalates to a point where coordination of several local agencies is required, the local emergency management coordinator may recommend that the chief executive of the local jurisdiction declare a local state of emergency, thereby activating appropriate response capacities local government. The local emergency management coordinator then coordinates the overall local response.

In accordance with Act 207, P.A. 1941, as amended, the State Police representative, in conjunction with the local fire department, assesses the situation and jointly determines the emergency measures to be taken. The Department of State Police representative is the focal point for recordkeeping, communications, and coordination of all other State agencies. This person may work out of the local command post if minimal response is necessary.

DNR has established the Pollution Emergency Alerting System (PEAS) as a 24-hour answering service to facilitate reporting of releases to the department.

Response at the scene consists of division personnel providing technical advice as listed below. Department personnel are not expected to perform hands-on first responder activities to control the incident. DNR has an environmental response team which can be activated by Regional or Deputy Directors or a team member. The team's primary purpose is to bring together all necessary expertise in appropriate divisions with technical expertise and is headed by the departmental emergency management coordinator. DNR has a representative on the Federal RRT. This person represents State interests on the team and functions as a liaison between the Federal and State governments.

1. MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DNR has authority to employ spill containment contractors under the Water Cleaning Emergency Fund. Local government may work directly with DNR in responding to the incident. DNR determines the emergency measures to be taken.

The following tasks are applicable to all types of oil or other hazardous material releases:

i. Environmental Response Division

The Environmental Response Division is designated as the lead division for discharges/releases which occur on land. The division will be responsible for the tasks listed below.

(a) Report to the scene to provide technical support and advice on the appropriate action to minimize the impact on the environment.

(b) Attempt to identify the party responsible for the release. Once identified, the actions of this party will be monitored to ensure that the party contains and cleans up the spill adequately and in a timely manner.

(c) If a responsible party is not identified or if the identified responsible party fails to take the appropriate actions in a timely manner, DNR may initiate actions to contain and clean up the spill. This is done under the authority of the Water Cleaning Emergency Fund or the Hazardous Waste Service Fund. Private contractors are generally hired to perform this service under the supervision of the Division. When these limited funding sources have been expended, the division shall notify the appropriate Federal agency of the restricted response capability and defer containment and cleanup to the Federal government.

(d) Collect samples of soil, water and other appropriate media for analysis to determine extent and concentration of contamination. The division shall be responsible for the preservation, delivery, and chain of custody for the samples, according to divisional standard operating procedures. A copy of the results shall be provided to the departmental emergency management coordinator in a timely manner.

(e) Coordinate with the Federal OSC (U.S. EPA for Federally designated inland zone; USCG for Federally designated coastal zone), if involved, and with the Federal RRT, if activated. The chief of the Site Management Unit is the Michigan representative on the RRT, and may request the assistance of the RRT if it is deemed necessary. This person functions as a liaison between the Federal team and the Emergency Management Division of the Department of State Police.

(f) Provide for the reporting of releases through the Pollution Emergency Alerting System (PEAS) 24-hour hotline. Spill reports will be forwarded to the appropriate DNR district and division. Any notification of a hazardous materials-related emergency received by the PEAS hotline will be relayed immediately to the Department of State Police, Special Operations Section.

ii. Surface Water Quality Division

The Surface Water Quality Division is the lead division for discharges/releases which occur on inland waters or enter the Great Lakes or connecting waterways.

The Division will be responsible for the tasks listed below.

(a) Report to the scene to provide technical advice on the type of chemical involved (through sampling).

(b) Provide advice on appropriate measures to protect rivers, streams, and other bodies of water.

(c) Attempt to identify the party responsible for the release. Once identified, the actions of this party will be monitored to ensure that the party contains and cleans up the spill adequately and in a timely manner.

(d) Collect samples of surface water and other appropriate media for analysis to determine the extent and concentration of contamination. The divisions shall be responsible for the preservation, delivery, and chain of custody for the samples according to divisional standard operating procedures. A copy of the results shall be provided to the departmental emergency management coordinator in a timely manner.

(e) If a responsible party is not identified or the identified responsible party fails to take the appropriate actions in a timely manner, DNR may initiate actions to contain and clean up the spill. This is done under the authority of the Water Cleaning Emergency Fund or the Hazardous Waste Service Fund. Private contractors are generally hired to perform this service under the supervision of the Division. When these limited funding sources have been expended, the division shall notify the appropriate Federal agency of the restricted response capability and defer containment and cleanup to the Federal government.

iii. Air Quality Division

(a) Provide advice on appropriate protective actions through the departmental emergency management coordinator.

(b) Oversee the emergency releasing and/or burning of material. Grant temporary permits or waivers as appropriate.

iv. Wildlife Division

(a) Provide advice on wildlife which may require protection from the effects of the incident through the departmental emergency management coordinator.

(b) Take action to protect wildlife, such as hazing, relocating, etc.

(c) Coordinate wildlife rehabilitation. Agreements are signed with various private wildlife rehabilitators within the State.

v. Fisheries Division

(a) The departmental emergency management coordinator provides advice on unique aquatic life which may require protection from effects of the incident.

(b) Obtain fish samples for laboratory analysis.

vi. Parks Division

(a) When a State park is involved, take action to clear persons from the affected area and control access to the area.

(b) Direct parks personnel to assist in spill containment as coordinated by the departmental emergency management coordinator.

vii. Law Enforcement Division

(a) The departmental emergency management coordinator is assigned to this division. This person coordinates all departmental activity when the situation is of a life-threatening nature and response is coordinated through the emergency management system, or when DNR Emergency Response Team is activated.

(b) Assist in clearing persons and boats from the affected area and control access to the area.

(c) Use watercraft to assist in boom deployment and material recovery.

(d) Maintain radio communications.

viii. Waste Management Division

(a) Advise on suitable disposal sites for collected material.

(b) Take action to ensure timely and proper disposal of material.

2. **BUREAU OF PUBLIC HEALTH**

a. Bureau of Environmental and Occupational Health

i. Monitor public and private water supplies.

ii. Monitor public exposure to air contaminants. The Division of Occupational Health is responsible for monitoring public exposure to air contaminants and for recommending countermeasures and protective actions. The division is responsible for ensuring that all employees whose duties expose them to an actual or potential health hazard during

the emergency response are afforded adequate protection as required by applicable occupational health standards, including 29 CFR 1910.120, the "Hazardous Waste Operations and Emergency Response" standard.

Teams of district industrial hygienists are dispatched, as appropriate and feasible, to monitor actual and potential exposure of citizens to airborne contaminants resulting from an emergency hazardous materials release. This may include real-time spot monitoring with direct reading devices, collection of spot samples for laboratory analysis, and assisting the Interagency Center on Health and Environmental Quality with dispersion estimates of ground-level airborne contaminant concentrations. Appropriate countermeasures and protective action guidelines are recommended to help citizens guard against the health hazards of airborne contaminants resulting from the release.

iii. Coordinate food service inspection in shelters.

b. Bureau of Health Facilities

i. Ensure that health care facility emergency procedures are adequate. The Division of Health Facilities Licensing and Certification has the responsibility for ensuring that health care facility emergency procedures are adequate.

ii. Ensure that adequate patient treatment is available and being provided during an incident.

iii. Coordinate the use of the MEDCOM system.

c. Departmental Emergency Management Coordinator

i. Coordinate victim identification services.

ii. Provide liaison to Federal emergency public health/medical programs and services. During this type of incident, the departmental emergency management coordinator coordinates with the Council on Environmental Quality in seeking the advice and assistance of Federal agencies such as ATSDR. The departmental coordinator also may need to coordinate with the HHS representative to the RRT.

d. Council on Environmental Quality (Toxicological Resource Center)

i. Report to the scene for initial public health evaluation.

ii. Identify chemicals.

iii. Perform air, water, or ground dispersion modeling and provide information though the departmental emergency management coordinator.

iv. Provide information concerning the characteristics of chemicals and recommended population protective actions through the departmental emergency management coordinator.

v. Provide information concerning the toxic health effects of the spill.

vi. Provide information to the public concerning health effects.

e. Bureau of Laboratory and Epidemiological Services

Perform laboratory analyses on the material to identify the type of chemical.

3. **DEPARTMENT OF STATE POLICE**

The local fire department that responds to an oil or other hazardous material incident is required to notify the Department of State Police, Fire Marshal Division. This reporting requirement is satisfied by notification of the nearest Department of State Police post, which relays the information to the Special Operations Section at State Police headquarters. The Department of State Police is responsible for notifying other State agencies.

The Department of State Police has primary responsibility for responding to an incident through the Michigan Fire Prevention Act (Act 207, P.A. 1947, as amended). Official Order 50 clarifies the department's procedures in implementing this act. It states the following:

a. If the incident occurs at a fixed site or involves rail transportation, the Fire Marshal Division has site coordination responsibilities.

b. If the incident involves road transportation, the Motor Carrier division has site coordination responsibilities.

c. If the incident is confined to a site area emergency, personnel from one of the two divisions are the focal point for recordkeeping, communications, and coordination with other state agencies. The Fire Marshal or Motor Carrier Division coordinates incident command in conjunction with local government. In the absence of either of these two divisions, the Emergency Management Division assumes first responder duties. In accordance with Act 207, Department of State Police personnel, in conjunction with the local fire department, determine the emergency measures to be taken.

In addition, Act 390, P.A. 1976, as amended, authorizes the department to coordinate all mitigation, preparedness, response, and recovery activities. This system is explained in the Michigan Emergency Management Plan. The emergency management system is used if the incident is of an immediate life-threatening nature requiring population protective actions or if the incident requires the coordination of State agencies.

In the event of a substantial release causing a community emergency which requires the assistance of several State agencies or population protective action, the Emergency Management Division coordinates the overall response. The division acts as liaison between State and local government. The Motor Carrier or Fire Marshal Division continues to coordinate the immediate site response. Department of State Police personnel are not expected to perform hands-on first responder activities to control the incident.

D. MINNESOTA

State law requires the responsible party to report any spills that may pollute the waters of the State or cause air pollution, regardless of the type of material or the quantity spilled. MPCA maintains a 24-hour spill reporting number (612-296-8100) to receive these reports. After business hours and on weekends, the State Duty Officer answers these calls, and refers any emergency situations to MPCA by paging the on-call Spills Team staff. The Spills Team will follow up on the report by contacting persons at the emergency site who have specific knowledge of the situation. Other MPCA staff with pertinent expertise or jurisdiction may be alerted and brought into the case as well.

Minnesota maintains a statewide emergency response contract with an environmental response firm located in St. Paul. Should the situation warrant it, the contractor may be dispatched by authorized State personnel (including the Spills Team and designated Department of Agriculture response staff) to respond to an emergency anywhere in the State. State Superfund money is available to cover any necessary emergency response costs incurred by the agency and its contractors; similarly, a special fund for agricultural chemical cleanups may be accessed for pesticide or fertilizer incidents. Response and cleanup costs are recoverable from the responsible party if one is eventually identified.

MPCA and the Department of Agriculture response staff are headquartered in St. Paul. In addition, there are trained part-time spill response staff located in each of the five MPCA regional offices, providing more effective and timely coverage of incidents in most parts of the State. However, regional staff are officially available for emergency response only during business hours.

E. OHIO

The Emergency Response Section of OEPA acts as the staff to the State Emergency Response Commission. This Community Right-to-Know Unit collects chemical inventories from facilities regulated by Title III. Grants are currently being provided to County LEPCs to develop and exercise emergency response plans. The facility identification forms collected by Ohio under Chapter 3750 of the Ohio Revised Code include the name and phone number of the facility emergency contact, and OEPA program permit numbers.

A toll-free number to receive spill reports and citizen complaints is answered 24 hours a day, seven days a week. Spill information is entered into a database for management.

Spills are responded to on a priority basis. Priority I spills are those requiring immediate response because of their volume (over 5,000 gallons of oil) or their toxicity. Priority II spills are responded to within 24 hours, and are smaller in volume (500 to 5,000 gallons) or of a toxicity that does not present an immediate threat to the public. Priority III spills make up the majority of spills.

When needed, OEPA may contract with Ohio Department of Transportation, Ohio Department of Natural Resources, Highway Safety, or the National Guard for air support in flying personnel to the scene of an emergency and samples to the laboratories.

When the spiller cannot be located or is uncooperative, OEPA is called in for containment and cleanup. The Immediate Removal Special Account is used for spills where a response is needed to provide containment of an actively spilling substance. OEPA also has two contractors under a $500,000 level-of-effort contract. This contract is used primarily for addressing small collections of abandoned drums of hazardous materials.

SECTION V: ANNEX 15 - COMPUTER BULLETIN BOARDS

A. NOAA RRT SYSTEM

Following is information concerning use of the NOAA RRT system computer bulletin board, created by the NOAA Hazardous Materials Response Branch. While there is no charge for access to the system, those who are not already users of NOAA E-Mail must first contact the Hazardous Materials Response Branch to obtain an account name and password. The address and phone number of the Branch are as follows:

NOAA [OMA341]
7600 Sand Point Way N.E.
Seattle, WA 98115

(209) 526-6317
(FTS) 392-6317

B. ORSANCO BULLETIN BOARD

Although the original intent of the ORSANCO bulletin board was to provide water users with information on water quality during a spill event, use of the board has been expanded, and now provides daily flow data and seasonal water quality data.

Flow forecast from NWS at 23 main stem stations and 15 tributary stations is posted daily after 1500 hours. Three-day flow projections are predicted, based on water models designed and maintained by NWS.

During the summer months (May through October), dissolved oxygen data is posted weekly from available monitoring stations. ORSANCO receives data from Racine, McAlpine, and Markland hydroelectric facilities, and COE stations at Montgomery, Belleville, Meldahl, and Cannelton Locks and Dams. As the dissolved oxygen approaches critical levels, the data is updated daily with the flow information. The 24-hour number for ORSANCO is 513-421-1151.

C. HAZARDOUS MATERIALS INFORMATION EXCHANGE (HMIX)

The HMIX is available 24 hours a day, 7 days a week. Each user is allowed 30 minutes of access time per session on the system. The HMIX is not intended to provide assistance during an actual emergency.

The two primary features of the HMIX are the Bulletin Board and the Message Exchange. The bulletin board features allows the user to view:

1) Main Board Bulletins - a listing of current HAZMAT news items.

2) Topic Listings - a listing of subjects within the HMIX.

The message exchange features allows the user to communicate with other users in three ways:

1) Electronic Mail - Send and receive messages.

2) Electronic File Transfer - Upload information onto the HMIX or download information from the system onto your computer.

3) Chat - On-line communication with other users.

The numbers for the system are 1-800-PLANFOR (752-6367) and 1-800-367-9592 in Illinois.

D. EMERGENCY RESPONSE NOTIFICATION SYSTEM

The Emergency Response Notification System (ERNS) is a nationwide centralized database supported by the U.S. EPA, the USCG, and DOT, and maintained by the Transportation Systems Center (TSC). ERNS was established to meet the legal requirement set forth in the NCP, CERCLA, CWA, and the Outer Continental Shelf Lands Act for a standardized interagency system for reporting the occurrence of unscheduled releases of oil or hazardous substances to the environment. This information-sharing network documents every release notification received by the NRC, U.S. EPA headquarters and Regional offices, and USCG. It contains information on every reported release, including releases of non-hazardous substances and releases below RQ levels, not only those that result in removal actions.

ERNS is a documenting system, not a tracking system. In addition, ERNS is a more inclusive database. The software for the ERNS and training to set up and use the system is available to States at no charge.

E. TELECONFERENCE PROCEDURES

COMMANDANT INSTRUCTION 2010.1 (dated 19 June 1991)

Subj: Headquarters Command Center Teleconferencing Services

1. PURPOSE. This instruction promulgates information regarding the use of teleconference capabilities available through the Headquarters Command Center telephone system and provides guidance for its use.

2. DISCUSSION

   a. Capability. The telephone equipment presently installed in the Coast Guard Headquarters Command Center (Flag Plot and the National Response Center) enables Command Center watchstanders to establish a variety of teleconferences. This service is available to authorized personnel during situations in which teleconferencing would enhance Coast Guard operations or Federal response capabilities, including planning. The system provides conferencing capabilities to or from any location accessible by phone. Each conference bridge, of which there are two, is capable of establishing a single conference of up to 60 participants, or up to 8 separate conferences with a total of 60 lines involved. The connections may be made via FTS and/or commercial lines.

   b. Authorized Use. Teleconference service is available to Coast Guard Headquarters and field personnel through Flag Plot or the National Response Center, and to NRT or

RRT representatives, and representatives of those Federal On-Scene Coordinators designated under the authority of the National Contingency Plan, through the National Response Center. The system is intended for use in support of non-routine Coast Guard operations and emergency response, but can be made available for routine official business use on a limited basis.

c. Conference Types. There are three methods of establishing a teleconference on the conference bridge:

(1) Operator Manual Dial. A Coast Guard Headquarters Command Center watchstander must originate the connection to each conferee. As contact is made, conferees are placed on hold until all participants have been reached. When all participants are on the conference bridge, the watchstander will begin the conference. New members may be added by the watchstander at any time during the conference. Since this conference method superimposes the burden of conference administration on the already limited resources of the Command Center, it should be used only when other conference methods are inappropriate.

(2) Meet Me. Each conferee is given a predesignated phone number which will ring directly into the conference bridge. The participants are responsible for dialing into the bridge at the pre-scheduled time of the conference. The Command Center watchstander will answer the calls as they arrive and place them into the correct conference. Fast conference buildup is an advantage offered by this method of teleconferencing. It has the added advantage of relieving the watchstander from having to dial all participants individually. This method also gives participants the option of entering the conference on an "as interested" basis.

(3) Auto-Hook. Requires no Command Center watchstander involvement during the conference. The watchstander places a portion of the bridge into the "Auto-Hook" mode for a predesignated period of time and assigns each participant a phone number. The conferees are then able to dial into the bridge at any time agreed upon by the participants. As participants dial in, the bridge auto-answers and the caller is placed into a conference with others who have called. Participants may enter and leave the conference as often as necessary. To ensure that only authorized callers enter the conference, a security code may be issued which would be keyed in when the bridge answers. If a Command Center watchstander is needed, any conference participant may dial "0," activating a signal for the watchstander to enter the conference.

(4) Recording. Any teleconference in which a watchstander is present will be recorded. Recording in the Auto-Hook mode requires watchstander assistance, which can be gained by dialing "0" once any portion of the conference has been established. Speaker phones should not be used by conferees during the conference, since their use results in serious degradation of sound quality for all participants.

d. Procedure to Request a Conference. Routine requests for a teleconference must be made to the respective Command Center Duty Officer at the numbers listed below a minimum of one (01) day in advance of the conference date. Emergency conferences may be requested at any time.

Flag Plot: (202) 267-2100; for FTS, delete area code
NRC: (202) 267-2173 (for FTS, delete area code)
or toll-free 1-800-424-8802 (except in Washington, DC, area)

The Flag Plot duty officer will service conference requests concerning Coast Guard operations, law enforcement, public relations, and congressional and international affairs. The National Response Center will service teleconference requests concerning environmental issues, marine inspections, port safety, and other subjects. The party making the request should determine which Duty Officer to call.

e. Availability. The Duty Officer will determine availability of the service and make recommendations regarding the type of conference to be made. The "Auto-Hook" teleconference is generally recommended since it minimizes the administrative burden on Command Center watch personnel. If the "Operator Manual Dial" is utilized, the person requesting the conference must provide a list of parties to be called along with their phone numbers. Final determination of conference type and availability rests with Commandant (G-TGC).

f. Single Point of Contact. Regardless of the teleconference method proposed, a single point of contact for conference coordination must be identified by the party requesting the service. Since availability of teleconferencing equipment is subject to change, the point of contact for the requesting office or unit should contact the Command center to confirm teleconference arrangements early in the day for which the conference is requested.

3. ACTION. Area and district commanders, commanders of maintenance and logistics commands, unit commanding officers, Commander, CG Activities Europe, chiefs of offices and special staff divisions at Headquarters shall abide by the guidelines in this instruction.

SECTION W: ANNEX 16 - MENTAL HEALTH ASPECTS OF DISASTER RESPONSE WORK

Disaster work can be a uniquely rewarding and demanding experience. Under disaster conditions people get to know one another more quickly than under usual social conditions. In disasters, workers often become like a family--working, eating, and literally living together. A strong sense of adventure exists, as well as a sense of meaning and purpose. However, after disasters, homecomings can be confusing, as they frequently are not what you may have hoped or planned. You are not the only one who is affected by a disaster. Your family and friends are also affected by both your absence and homecoming. You may find the following information helpful as you return home.

REST

Often you may not get enough rest while working on a disaster, resulting in exhaustion when you return home. It may take several days, but it is important to catch up on rest. This need for rest may cause problems as your family may want and need your attention, time, and energy. Their needs must be considered also, so try to anticipate this and negotiate your respective needs carefully.

PACE

After having been in the fast-paced disaster environment, you may find it difficult to gear down to a more normal pace. You may find yourself rushing through tasks, or feeling guilty when you're not actively engaged in doing something. Try to be tolerant of others who are moving at a slower pace--they are usually going at a normal pace!

TALKING

You may not want to talk about your disaster experience. Family and friends may be interested, but you should anticipate the following:

-- That others may not be interested.

-- While they may be interested, they did not experience the disaster and may not feel as intensely as you.

-- Others may want to tell you what has been happening to them during your absence. Be tolerant and understanding. What they have been through is as important to them as your experiences are to you.

-- Remember that just because someone seems uninterested in hearing about the disaster, they aren't uninterested in you. The disaster has been so much a part of your life for the last few days or weeks that you may be preoccupied with your experiences when you return home. While some people will be concerned about your well-being, they may have little interest in your disaster experience.

-- You may not want to talk a lot about your disaster experience. This may be particularly true if the experience was difficult for you or if you are very fatigued. Help those around you understand that you are still preoccupied with your experience and that you're not ready to talk yet. You may want to reassure them that this is not an effort to exclude them, but that

you just need more time.

-- Understand that you may alternate between wanting and not wanting to talk about your disaster experience. You may find this switching disconcerting because you may not be able to predict or control these shifts. If you worked in the Disaster Agency Command Station or came into contact with victims, you may have heard the same thing from victims who were frightened because they could not control their emotions. Over time these shifts will become less frequent and surprising. Understand, and help those around you understand, that this is a normal and natural response.

EMOTIONS

When you return home, it's possible to have emotional reactions that may surprise or sometimes frighten you. If you can anticipate some of these emotions, you can manage them better. The following are some examples:

-- Disappointment often results when fantasies about returning home don't match with the reception. You may have very positive fantasies about happy reunions with family and colleagues, only to find them angry because of your absence. Try to keep reunion fantasies realistic.

-- You may sometimes experience frustration and conflict when your needs are inconsistent with the needs of family and friends. A familiar tale is of the disaster worker who returns home after weeks of eating hotel food, desperately wanting a home-cooked meal, and finds a spouse who can't wait to go out for dinner!

-- You may become angry when exposed to people's problems that seem minor or even trivial compared to what you have seen at the disaster site. This may happen while reading the paper, watching television, or talking with family and friends. It is important to remember that you can easily hurt people by minimizing their concerns and problems.

-- You may be familiar with the concept of victim identification. You have a strong emotional response to some victims because, in some way, they remind you of yourself or of someone important to you. The same phenomenon may occur when you return home. That is, friends and family members may remind you of disaster victims you have seen. This may produce emotional reactions that not only surprise you, but surprise and confuse the unwitting recipient of these emotions. Try to help others understand this phenomenon.

-- Mood swings are common upon returning home. You may change from happy to sad, tense to relaxed, outgoing to quiet, etc. These mood swings are normal and natural. They are part of the process by which you resolve conflicting and contradictory feelings. As time passes these mood swings will become less dramatic, less frequent, and less surprising.

CHILDREN

Dealing with children when you return home deserves special attention. It is important to give children information in a manner that helps increase their understanding and does not confuse or frighten them. Help young children understand why you were away and what you did. Think in advance about the kind of information they might want and the level of detail you should provide. It is usually not advisable to provide dramatic stories or graphic details of damage that might frighten

children and generate fears of their own vulnerability as well as yours. If you have collected newspaper pictures or stories, you may want to share them with older children. Don't forget to encourage children to talk about what happened in their lives during your absence. They will find your interest reassuring.

As disaster workers, we realize that even though we may be looking forward to going home, some feelings of sadness, loss, and letdown may occur when the disaster operation is over. When returning home, think about the experiences described in this section; it may help everyone involved have a more satisfying reunion.

28 May 1992

SECTION X: ANNEX 17 - U.S. EPA STANDARD COMMUNITY RELATIONS PLAN

Site Name: _____

Site ID: _____

OSC Name: _____

CRC Name: _____

U.S. EPA Toll-Free Number: _____

I. COMMUNITY RELATIONS ISSUES

A) Community Assessment (include factors such as site's proximity to residences, schools, other public buildings; and the number of persons potentially affected)

B) Background of Community Involvement (include past or current known involvement by U.S. EPA or State and local agencies, etc.)

C) Actual and/or Potential Community Concerns

D) List Possible Locations of Information Repository (complete address, area code and phone number; repository should be town hall or library)

E) Possible Communication Tools and Methods

II. IMPLEMENTATION OF COMMUNITY RELATIONS PLAN

A) Enlisted support and participated with local officials in coordinating community relations activities.

Yes _____ No _____

B) Identified citizens' perceptions of the site.

Yes _____ No _____

If yes, how?

C) Developed citizen mailing list.

Yes _____ No _____

D) Provided follow-up information on removal activities to interested public.

i) Date and Office of Public Affairs number of Note to Correspondents announcing information repository.

ii) Date and Office of Public Affairs number of any news releases.

iii) Date and topic of Fact Sheet (if any).

iv) Date, place, and topic of public meeting (if any).

v) Approximate number of citizen phone calls.

vi) Other follow-up activities.

SECTION Y: ANNEX 18 - ACRONYMS

API	American Petroleum Institute
AST	Atlantic Strike Team
ATSDR	Agency for Toxic Substance and Disease Registry
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BOA	Basic Ordering Agreement
BOM	Bureau of Mines
BR	Bureau of Reclamation
CAER	Community Awareness and Emergency Response Program
CAMEO	Computer-Aided Management of Emergency Operations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CHEMTREC	Chemical Transportation Emergency Center
CHRIS	Chemical Hazard Response Information System
CIS	Chemical Information System
CCGD2	Commander, Second Coast Guard District
CCGD9	Commander, Ninth Coast Guard District
CMA	Chemical Manufacturers Association
COE	U.S. Army Corps of Engineers
COTP	Captain of the Port
CWA	Clean Water Act
DHHS	Department of Health and Human Services
DOA	Department of Agriculture
DOC	Department of Commerce
DOD	Department of Defense
DOE	Department of Energy
DOI	Department of Interior
DOJ	Department of Justice
DOL	Department of Labor
DOS	Department of State
DOT	Department of Transportation
EPCRA	Emergency Planning and Community Right-to-Know Act
ERCS	Emergency Response Cleanup Contractors
ERT	Environmental Response Team
FAX	facsimile transmission
FEMA	Federal Emergency Management Agency
FTS	Federal Telecommunications System
GLC	Great Lakes Commission
HACS	Hazard Assessment Computer System (USCG)
IAG	Interagency Agreement
IC	Incident Commander
ICS	Incident Command System
IDEM	Indiana Department of Environmental Management
IEPA	Illinois Environmental Protection Agency
LEPC	Local Emergency Planning Committee
MDNR	Michigan Department of Natural Resources

MOU	Memorandum of Understanding
NIOSH	National Institute for Occupational Safety and Health
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPDES	National Pollution Discharge Elimination Systems Permits
NPS	National Park Service
NRC	National Response Center
NRT	National Response Team
NSF	National Strike Force
OEPA	Ohio Environmental Protection Agency
OHMTADS	Oil and Hazardous Materials Technical Assistance Data System
OPA	Oil Pollution Act of 1990
ORSANCO	Ohio River Valley Water Sanitation Commission
OSC	On-Scene Coordinator
PIRS	Pollution Incident Reporting System
POLREP	Pollution Report in Message Format
RCP	Standard Federal Region Oil and Hazardous Substances Pollution Contingency Plan
RQ	Reportable Quantity
RRT	Regional Response Team
SARA	Superfund Amendments and Reauthorization Act of 1986
SERB	State Emergency Response Board
SERC	State Emergency Response Commission
TERC	Tribal Emergency Response Commission
UMRBA	Upper Mississippi River Basin Association
USCG	United States Coast Guard
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
WDNR	Wisconsin Department of Natural Resources