2016

Western Lake Superior Area Contingency Plan

USCG MSU Duluth

10/28/2016

U.S. Department of Homeland Security
United States Coast Guard

Commander
Ninth Coast Guard District

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06 Jun 2017

MEMORANDUM

From: J. E. RYAN, RADM
CGD NINE (d)

To: CG MSU DULUTH

Subj: APPROVAL OF 2017 WESTERN LAKE SUPERIOR AREA CONTINGENCY PLAN

Ref: (a) R 171823Z OCT 16 CCGDNINE CLEVELAND OH 2017 D9 COASTAL ZONE AREA CONTINGENCY PLAN (ACP) STRATEGY

1. Congratulations to you and your staff! Your subject plan revision has been reviewed by the D9 Contingency Preparedness Branch and the District Response Advisory Team who determined the plan is in substantial compliance with reference (a), all applicable references, and that it is also available to the public on Coast Guard Homeport.

2. Please also pass along my thanks to your Area Committee (AC) for the outstanding effort that went into this significant revision. A total plan revision is a very challenging process and I appreciate the enormous amount of work you accomplished to meet the aggressive but necessary compliance date. Continuous improvement and maintaining the current momentum will ensure that we are always prepared to effectively respond to oil discharges and hazardous substance releases wherever they may occur in our coastal zones. To build upon that constant improvement in the course of this ACP review, we identified areas for improvement by the Area Committee in enclosures (1) and (2).

3. If you have any questions regarding this matter, please feel free to contact my D9 POC, LCDR Byron Hayes, CGD9 (dxc), by phone at: (216) 902-6096 or by email at: Byron.H.Hayes@uscg.mil

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Enclosures: (1) Western Lake Superior Area Contingency Plan Review Summary Score
(2) Western Lake Superior Area Contingency Plan Review Checklist

RECORD OF CHANGES			
CHANGE NUMBER	**DATE OF CHANGE**	**DATE ENTERED**	**BY WHOM ENTERED**
2002-001	15 April 2002	15 April 2002	CWO4 Bob Hildebrand
2005-001	31 March 2005	31 March 2005	CWO2 Barb McDonald
2005-002	19 September 2005	19 September 2005	Mr. Jared Angelle
2006-001	30 November 2006	30 November 2006	Mr. Larry DiDomenico
2009-001	30 September 2009	30 September 2009	Mr. Larry DiDomenico
2011-001	30 December 2011	30 December 2011	Mr. Larry DiDomenico
2014-001	10 March 2014	10 March 2014	Mr. Larry DiDomenico
2018-001	07 February 2017	07 February 2017	MSTC Christopher Johnston

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OVERVIEW

AREA CONTINGENCY PLANS

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

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

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

Resource Planning Standard - Ensuring a rapid, efficient mitigation of actual or potential pollution discharges and releases, fulfills the ACPs intent for a coordinated response. It is USCG policy to ensure timely and effective response action is taken to control and remove discharges of oil and releases of hazardous substances, including substantial threats of discharges and releases, into the coastal zone.

Initial response is critical since amounts of materials spilled/discharged are often under or misreported. Resources should provide for no greater than a 2 hour on-scene arrival time at any location within the (Area of Responsibility) AOR. This response time is measured from initial notification until time of arrival on scene, including moderate environmental conditions allowing for safe transit and 30 minutes of preparation time.

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

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

1000 INTRODUCTION

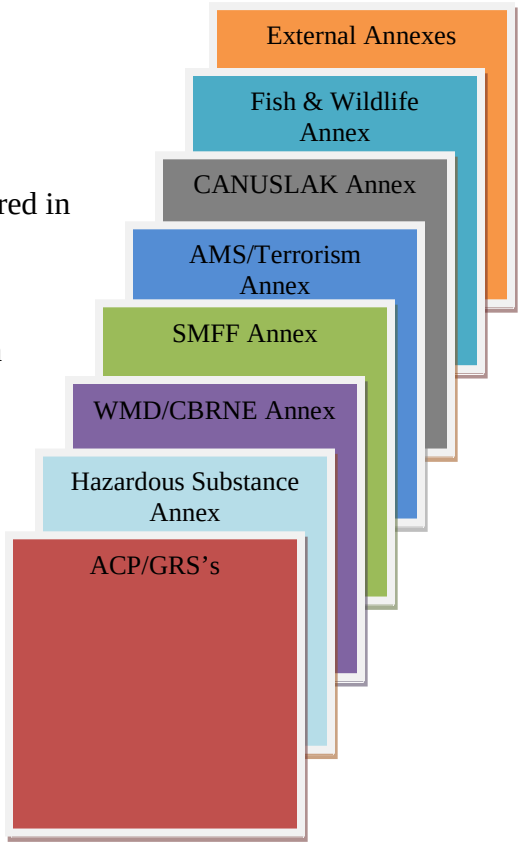
The Western Lake Superior Area Contingency Plan (WLS-ACP) describes the strategy for a coordinated federal, state, tribal and local response to a discharge or substantial threat of discharge of oil, or a release or substantial threat of release of hazardous substance(s) within the boundaries of (Coastal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

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

Presently, there are no tank ships operating in Western Lake Superior within U.S. waters. However, tank vessels operate in Canadian waters en route Thunder Bay, Ontario. The WCD scenario in Appendix D of this plan is based on information provided by the Canadian Coast Guard. This WCD is 2,520,000 gallons of cargo and 160,000 gallons of bunker oil. If a U.S. or Canadian Laker is the source of the WCD discharge then the scenario is 160,000 gallons of bunker oil. In addition, several pipelines run through the zone from northwest Canada through Minnesota, Wisconsin and points south and east. The worst-case discharge from a pipeline discharge is its entire contents between two automatic shut-off locations.

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

1010 HOW TO USE THE WLS-ACP



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

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

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

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

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

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

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

1020 MAINTENANCE OF THE AREA CONTINGENCY PLAN

Maintenance of a (Coastal Zone) ACP is the responsibility of the FOSC. Maintenance of the Great Lakes Base Plan is the responsibility of the Ninth District Contingency Planning Branch (dxc). As living documents, review and updates of the ACPs and Great Lakes Base Plan are ongoing to ensure accuracy and utility for planning and preparedness. Suggestions and comments about the plans are welcome at any time. ACPs shall be reviewed annually to determine if any changes are necessary. All updated plans shall be submitted to the District Commander for review by 01 July of each year. A comprehensive

review of ACPs shall be conducted on a quadrennial basis in accordance with the National Preparedness Response Exercise Program (PREP) schedule. Following this review, updated plans shall be submitted to the District Commander for review and approval with documented Records of Change by 01 July. The most current version of the ACP and WLS-ACP will be posted on the Homeport micro site and will not contain sensitive security information (SSI).

1030 AREA CONTINGENCY PLAN PURPOSE

The ACPs describe the strategy for a coordinated federal, state, tribal and local response to any vessel, offshore facility, submerged pipeline or waterfront facility within the Great Lakes that experience:

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

Discharges, releases or exposure incidents can occur for various reasons and the causes can include human error, mechanical failure, fire, and explosion and/or hostile or terrorist activity. In the writing of this plan, a number of factors were considered such as:

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

The ACPs shall be used as:

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

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

- GRSs
- Hazardous Substance
- Weapons of Mass Destruction (WMD)/Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE)

- Salvage and Marine Fire Fighting (SMFF)
- Area Maritime Security (AMS)/Terrorism
- CANUSLAK (Great Lakes Operational Supplement to the Joint Marine Contingency Plan)
- Fish and Wildlife (F&W)
- External

1040 DEFINITIONS

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

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

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

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

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

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

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

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

DISTRICT RESPONSE ADVISORY TEAM (DRAT) – The DRAT is a readily accessible, deployable team which provides technical and logistical support for the Sector Commanders within the USCG District. Their explicit responsibility is to enhance all-hazard response preparedness for each port within the District, and to provide expertise and technical assistance to the FOSC during oil spills or chemical

releases. In addition to this team, there are personnel identified as Expanded DRAT members co-located at the District that bring additional capabilities to bear as needed.

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

FEDERAL ON-SCENE COORDINATOR (FOSC) – The federal official pre-designated by the USEPA or the USCG to coordinate responses under subpart D of the NCP (40 CFR Part 300) or the government official designated to coordinate and direct removal actions under subpart E of the NCP. A FOSC can also be designated as the Incident Commander.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

VESSELS CARRYING OIL AS A SECONDARY CARGO - Means vessels carrying oil pursuant to a permit issued under 46 CFR Subchapter D (30.01-5), 46 CFR Subchapter H (70.05-30), or 46 CFR Subchapter I (90.05-35), an International Oil Pollution Prevention (IOPP) or Noxious Liquid Substance (NLS) certificate required by 33 CFR 151.33 or 151.35, a dedicated response vessel operating outside a response area, or any uninspected vessel that carries bulk oil cargo.

WORST CASE DISCHARGE (facilities) - Means:

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

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

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

1050 ACRONYMS

AC Area Committee
ACP Area Contingency Plan
AMSP Area Maritime Security Plan
AOR Area of Responsibility
ATSDR Agency for Toxic Substance Disease Registry
AST Atlantic Strike Team (USCG)
AVO Affiliated Volunteer Organization
BIA Bureau of Indian Affairs
BOA Basic Ordering Agreement
BBL Barrel (42 U. S. gallons)
BSEE Bureau of Safety and Environmental Enforcement
CAC Crisis Action Center
CANUSLAK Canadian/ U.S. Lakes Annex to the Joint Marine Pollution Contingency Plan
CBRNE Chemical Biological Radiological Nuclear Explosive
CEQ Council on Environmental Quality
CERCLA Comprehensive Environmental Response, Compensation & Liabilities Act
CHRIS Chemical Hazardous Information Response System
CGHQ Coast Guard Headquarters
CO Commanding Officer
COMMCEN Communications Center
COTP Captain of the Port (USCG)
CFR Code of Federal Regulations
CWA Clean Water Act
DOC U. S. Department of Commerce
DOD U. S. Department of Defense
DOE U. S. Department of Energy
DOI U. S. Department of the Interior
DOL U. S. Department of Labor
DRAT District Response Advisory Team
DRG District Response Group
EOC Emergency Operations Center
ERT Environmental Response Team (USEPA)
FAA Federal Aviation Administration
FLAT Federal Lead Administrative Trustee
FOSC Federal On-Scene Coordinator (USCG)
FINCEN Coast Guard Finance Center
FWPCA Federal Water Pollution Control Act
33 USC 1321 - U. S. Code Title 33, Part 1321 (Codified version of the FWPCA)
GAL Gallon
GLWQA Great lakes Water Quality Agreement
GRS Geographic Response Strategy

GSA General Services Administration
ICS Incident Command Structure
ICS-AC Area Command
IMAT Incident Management Action Team
IMH Incident Management Handbook
ISB In-Situ Burn
JIC Joint Information Center
JOC Joint Operations Center
MIPR Military Interdepartmental Purchase Request
MOA Memorandum of Agreement
MOU Memorandum of Understanding
MSM Marine Safety Manual (USCG)
MSST Marine Safety and Security Team
MTSRU Marine Transportation System Recovery Unit
NCP National Contingency Plan
NIC National Incident Commander
NICa Alternate National Incident Commander
NIOSH National Institute for Occupational Safety and Health
NOAA National Oceanographic and Atmospheric Administration
NPFC National Pollution Fund Center
NPS National Park Service
NRC National Response Center
NRDAR Natural Resource Damage Assessment and Restoration Program
NRF National Response Framework
NRS National Response System
NRT National Response Team
NSF National Strike Force
NSFCC National Strike Force Coordination Center (USCG)
OPA 90 Oil Pollution Act of 1990
OSC On-Scene Coordinator (USEPA)
OSHA Occupational Safety and Health Administration
OSLTF Oil Spill Liability Trust Fund
OSRO Oil Spill Removal Organization
PA Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan
PAO Public Affairs Officer
PIAT Public Information Assist Team (USCG)
POLREP Pollution Report in Message Format
PREP National Preparedness for Response Exercise Program
PRFA Pollution Removal Funding Authorization
PRP Potentially Responsible Party (CERCLA)
RAR Resources at Risk
RCP Regional Contingency Plan

RCRA Resource Conservation and Recovery Act of 1976
RP Responsible Party
RRC Regional Response Center
RRI Response Resource Inventory
RRT Regional Response Team
SDS Safety Data Sheet
SONS Spill of National Significance
SSC Scientific Support Coordinator (NOAA)
SUPSALV Supervisor of Salvage (USN)
UAC Unified Area Command
UCS Unified Command System
USACOE U. S. Army Corps of Engineers
USC U. S. Code
USDOT U. S. Department of Transportation
USEPA U.S. Environmental Protection Agency
USFWS U. S. Fish and Wildlife Service
USCG U. S. Coast Guard
USGS U. S. Geological Survey
USN U. S. Navy

1060 CRITICAL INCIDENT COMMUNICATIONS

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

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

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

1060.1 USCG PROCEDURES

The following is an overview (not inclusive) of the procedures to be followed under the Critical Incident Communications Process:

- Initial Report - The purpose of the conference call is for the Unit to make initial notification of the incident. The initial notification will normally be in clear voice (non-secure). Within 5 minutes of becoming aware of an incident the Unit must contact (800) 323-7233 and request a conference call with:
  - District
  - Area
  - USCG Command Center

- Follow-on update - Within 30 minutes of the Unit becoming aware of an incident the USCG Command Center will initiate a conference call with:
  - The Unit
  - District Commander
  - Area Commander
  - Commandant or designee

- The Unit will provide:
  - Update on the incident
  - Initial course of action
  - Resource needs (i.e. National Strike Force, Maritime Safety and Security Team)

The conference call will normally be conducted via a secure conference line.

1100 AUTHORITY – ESTABLISHMENT OF AREA COMMITTEES AND AREA CONTINGENCY PLANS

ACP's are required by Title IV, Section 4202 of the Oil Pollution Act of 1990 (OPA 90) which amends Subsection (j) of Section 311 of the Federal Water Pollution Control Act (FWPCA) (33 U.S.C. 1321 (j) as amended by the Clean Water Act (CWA) of 1977 (33 U.S.C. 1251 et seq) to address the development of a national planning and response system.

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

As part of this National Planning and Response System, Area Committees (AC) were established for each area designated by the president. Qualified personnel from federal, state, tribal and local agencies comprise the AC. Each AC, under the direction of the FOSC for the area, is responsible for developing their local ACP. Each AC is responsible for working together as a committee including all applicable federal, state, tribal and local officials to complete or include in their ACP:

Base Plan and Annexes See Section 1010.

GRS Components

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

Executive Order 12777 of 22 October 1991, gave the Commandant of the USCG (through the Secretary of Transportation) for coastal zones and the Administrator of the USEPA for the inland zones, the functions of designating areas, appointing area committee members, determining the information to be included in area contingency plans, and reviewing and approving area contingency plans.

Title IV of the Homeland Security Act, Section 402 transferred functions of the USCG from the Department of Transportation to the Department of Homeland Security.

1110 POLLUTION INVESTIGATION AUTHORITY

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

- USCG
- DOE
- DOD
- USEPA
- Minnesota Pollution Control Agency
- Wisconsin Department of Natural Resources
- Michigan Department of Environmental Quality

1120 GUIDING PRINCIPLES

The following general statements summarize the primary guiding principles associated with these direct, field-oriented investigations.

Investigative and response actions must interfere with each other as little as possible. Investigative efforts often involve the collection of evidence in a timely manner. This requires investigative efforts and evidence gathering during the high-intensity emergency phase of removal actions. Every effort must be made to coordinate investigative activities to minimize the impact on response and removal efforts. Simply separating investigative and removal functions amongst distinct and different individuals or groups' serves to mitigate any potential interference one activity may have on the other. Conversely, individual investigations must understand the concerns of those directing response efforts to minimize the impact of the incident on public health, welfare, and the environment.

Coordination of investigative activities is very important where possible. Any number of mechanisms exists to coordinate efforts on-site during an incident. Periodic coordination meetings greatly enhance command, control, and communications amongst different parties. Lead agencies may carry the dual role of conducting an investigation and coordinating these meetings.

Investigations into, for example, cause, liability, and violations of applicable laws and regulations are a reality. The various federal, state, and local agencies discussed above will be involved in an investigative role as applicable.

Investigative roles, efforts, and degree of interest will vary from incident to incident. Investigative interest and activity will be a function of the scope, size, impact, location, and causes of the incident.

Understanding each agency's role increases the efficiency of investigative activities. There is a need for a strong commitment to develop necessary interagency understandings and working agreements that contribute towards this goal. In addition, these efforts would facilitate the smooth acquisition of necessary information and evidence on an on-going basis. The emphasis on this element is to make these improvements before an incident occurs.

1200 GEOGRAPHIC BOUNDARIES

The geographic boundaries of each Regional Response Team (RRT) are identified on the map located on the National Response Team website. Links from this page lead to the RCP for the region.

Ninth Coast Guard District FOSC Boundaries

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

most locations, the boundary between inland and coastal zones follows the near shore areas adjoining the Great Lakes and the interconnecting rivers.

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

EPA Region 5 zone (includes the states of Minnesota, Wisconsin, Michigan, Ohio, Illinois, and Indiana)

Tribal Ceded Territories (Lake Superior: Minnesota, Wisconsin, and Michigan)

U.S. Coast Guard Captain of the Port Duluth (COTP) Zone:

The COTP Duluth Zone falls within EPA's Region 5 Zone and largely encompasses Western Lake Superior and other inland waters designated as U.S. navigable waters/waterways within northern Minnesota, northern Wisconsin and the western portion of Michigan's Upper Peninsula. The COTP Duluth Zone boundary line is officially described in Title 33, Code of Federal Regulations (CFR) § 3.45-25 with excerpt below. The red line in the illustration below depicts the COTP Duluth Zone.

U.S. Coast Guard Captain of the Port Duluth - Federal On-Scene Coordinator (FOSC) Zone:

For the purpose of delineating Federal On-Scene Coordinator (FOSC) jurisdictional duties between the USCG and EPA, the FOSC Duluth boundary includes the following: Western Lake Superior (U.S. waters), all bays, harbors, mouths of rivers and its tributaries.

In addition, as defined in the U.S. EPA Region 5 Regional Contingency Plan/Area Contingency Plan, dated March 2015 "Within Duluth/Superior Harbor, COTP Duluth will assume the responsibility for providing FOSCs in Duluth/Superior Harbor to the mouths of all small tributary rivers and creeks entering into the harbor, plus the St. Louis River serviced by existing patrols and aids to navigation up to the Highway Bridge on Route 23 at Fond du Lac, Minnesota, and the waters of Lake Superior within COTP Duluth".

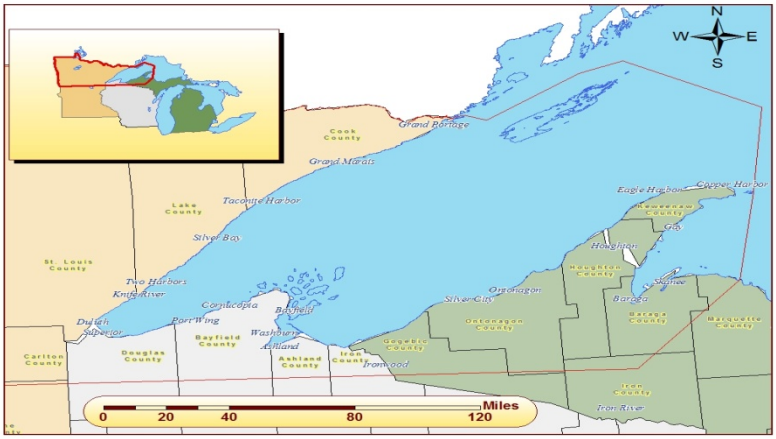
Ninth Coast Guard District Responses in the Inland Zone

The U.S. EPA Region 5 Regional Contingency Plan/Area Contingency Plan, Ordinarily, the Ninth Coast Guard District will not provide the On-Scene Coordinator (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 predestinated US 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 US EPA Region 5 office may 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.

NOTE: The FOSC Duluth Zone includes the following counties listed by state:

- **Minnesota**: Cook, Lake, St Louis, Carlton
- **Wisconsin**: Douglas, Bayfield, Ashland, Iron
- **Michigan**: Gogebic, Ontonagon, Houghton, Keweenaw, Baraga, Marquette



"From a point where the Minnesota/North Dakota state line meets the international boundary; thence southerly along the Minnesota/North Dakota state line to latitude 46 degrees 20'N; thence due east to longitude 88 degrees 30'W; thence northeasterly to the shore of Lake Superior at longitude 87 degrees 45''; thence northerly to Manitou Island Light, located at latitude 47 degrees 25'N, longitude 87 degrees 35'W; thence north to the international boundary at longitude 87 degrees 35'W; thence westerly along the international boundary to the starting point." 33 CFR 3.45-25

The Coast Guard supplies the FOSC for incidents originating in the coastal zone while the EPA supplies the FOSC for incidents originating in the inland zone. It is important to note that the FOSC, while having specific responsibilities and authority under the National Contingency Plan (NCP), will be part of a "Unified Command" made up of the appropriate federal, state, local, and responsible party representatives.

During incidents that require federal presence, the first federal official on scene will assume the role of the Federal On-Scene Coordinator and integrate into the existing command structure established by the local or state government. If the incident occurs in the EPA zone, the Coast Guard will act as the FOSC until relieved by an EPA official.

1210 RELATIONSHIP TO OTHER PLANS OR BOUNDARIES

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

- National Response Framework (NRF)
- National Contingency Plan (NCP)
- Region 5 Regional Contingency Plans (RCP)
- Minneapolis Sub-Area Contingency Plan
- Red River Valley Sub-Area Contingency Plan
- Northern Michigan Area Contingency Plan (Sault Ste Marie, MI)
- Joint U.S./Canada Marine Pollution Contingency Plan (USCG/Canadian Coast Guard) (CANUSLAK)
- Joint U.S./Canadian Inland Contingency Plan (USEPA/Environment Canada) (CANUSCENT)
- Applicable Facility & Vessel Response Plans that operate in this zone
- Applicable Tribal, State and Local Plans

1300 AREA COMMITTEE

1310 PURPOSE

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

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

1320 ORGANIZATION

The FOSC shall serve as the Chair for their respective AC(s). The FOSC designates a representative of a federal, state, or local agency, or a territorial representative to serve as Vice-Chair, who shall be appointed in writing. Acting as Chair of inland zone AC's, precludes the USEPA representative to an AC from serving as Vice-Chair. If appropriate, the FOSC designates one or more Vice-Chairs. The members of the AC may also fill individual functional roles in the area response organization.

The FOSC shall appoint members, in writing, to serve on the AC for their zone. Each ACP details and contains AC charters, membership, subcommittees and meeting minutes for the respective area.

The Western Lake Superior Area Committee has been divided into two specific Port Area Committees (PACs), as defined below:

- Duluth, MN/Superior, WI Area Committee (Minnesota-Wisconsin)
  - Chairman, COTP Duluth (FOSC)
  - Vice Chairman, Mr. John Sager, Wisconsin DNR Northern Regional Spill Coordinator
  - Vice Chairman, Mr. Kevin Mustonen, Minnesota Pollution Control Agency
- Upper Peninsula (Houghton/Hancock), MI Area Committee
  - Chairman, COTP Duluth (FOSC)
  - Vice Chairman, Christopher Van Arsdale, Houghton-Keweenaw County Emergency Manager

1330 AREA COMMITTEE MEMBERS

The following is a list of representative agencies, as well as local port stakeholders that could be represented on an AC. Each ACP will contain a complete list of the individual AC members including their contact information:

Federal agencies

United States Coast Guard District Nine
United States Coast Guard Sector Salt Ste Marine
United States Cost Guard Marine Safety Unit (MSU) Duluth
Coast Guard Station Portage
United States Environmental Protection Agency (EPA) Region 5
National Oceanic and Atmospheric Administration
U.S. National Park Service
Department of the Interior – Regional Environmental Officer
USDA-APHIS Wildlife Services
Federal Railroad Administration

U.S. Fish and Wildlife Services

State agencies

Minnesota Pollution Control Agency
Minnesota Department of Natural Resources
Minnesota Division of Homeland Security and Emergency Management
Wisconsin Department of Natural Resources
Wisconsin Division of Emergency Management
Michigan Department of Environmental Quality
Michigan Department of Natural Resources
Michigan State Police, Division of Emergency Management
Michigan Department of Transportation

Local agencies

Cook County Emergency Management
Lake County Emergency Management
St. Louis County Emergency Management
Carlton County Emergency Management
Douglas County Emergency Management
Bayfield County Emergency Management
Ashland County Emergency Management
Iron County Emergency Management
Duluth and Superior Fire Departments
Gogebic County Emergency Management
Ontonagon County Emergency Management
Houghton County Office of Emergency Measures (Emergency Management)
Keweenaw County Emergency Management
Baraga County Emergency Management
Marquette County Emergency Services Division
City of Houghton and Hancock (Fire Department and City Manager)

Tribal representatives

Great Lakes Indian Fish and Wildlife Commission
1854 Authority
Grand Portage Band of Lake Superior Chippewa
Fond du Lac Band of Lake Superior Chippewa
Bad River Band of Lake Superior Chippewa
Red Cliff Band of Lake Superior Chippewa
Keweenaw Bay Indian Community

Port stakeholders

Duluth Seaway Port Authority and Superior Planning and Development Department
CN-US Great Lakes Fleet, Inc. (Two Harbors Fueling Facility)
Enbridge Energy Partners, LP
Calumet Superior, LLC (Duluth Marine Terminal and Superior Refinery)
Lake Superior Warehousing
Western Lake Superior Sanitation District

BOA contractors

Environmental Troubleshooters
Marine Pollution Control
National Response Corporation
OSI Environmental, Inc.
West Central Environmental Consultants
Resolve Salvage & Fire (Americas) Inc.
UP Environmental Services

Environmental

Mercy Ambulance

Academia

University of Wisconsin Extension – Lake Superior National Estuarine Research Reserve
Michigan Tech University

1330.1 SUBCOMMITTEES

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

The subcommittees listed below are activated when deemed necessary.

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

1400 NATIONAL AND REGIONAL RESPONSE SYSTEMS

1410 NATIONAL RESPONSE SYSTEM

The National Response System (NRS) was developed to coordinate all government agencies with responsibility for environmental protection, in a focused response strategy for the immediate and effective clean up of oil or hazardous substance discharge. The NRS is a tiered response and preparedness mechanism that supports pre-designated FOSC in coordinating national, regional, local government agencies, industry, and responsible party during a response.

Most local agencies that respond to emergencies utilize some form of ICS. Although response to oil spill incidents will be managed through the Unified Command (UC), local agencies will likely utilize internally some form of ICS for interfacing with other local agencies. UC is in fact an element of ICS.

They are identical with the exception of designation of the Incident Commander (IC). In ICS, one individual, usually the first arriving fire company officer, assumes the role of IC. Due to the expansive scope of large oil spills, a UC is utilized. Here the federal and state OSCs, the local agency IC, and the Responsible Party's (RP) Incident Manager work together to resolve the incident.

The ICS/UC provide a method for different agencies, organizations, and individuals to work together toward a common goal, in an organized, productive, efficient, and effective manner during emergencies. The systems consist of procedures for controlling personnel, facilities, equipment, and communications during all phases of an incident. Both are designed to evolve from the time an incident begins, through initial attack and stabilization, to long-term control, and finally, to resolution of the incident. These systems are adaptable to any type of incident whether fire, explosion, hazardous substances release, or oil spill. Structure can be established and rapidly expanded depending on changing conditions of the incident.

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

1410.1 SPILL OF NATIONAL SIGNIFICANCE

A Spill of National Significance (SONS) is that rare, catastrophic spill event which captures the nation's attention due to its actual damage or significant potential for adverse environmental impact. A SONS is defined as a spill which greatly exceeds the response capability at the local and regional levels and which, due to its size, location, and actual or potential for adverse impact on the environment is so complex, it requires extraordinary coordination of federal, state, tribal, local and private resources to contain and clean up. As per the NCP (40 CFR 300.323), a discharge may be classified as a SONS only by the Administrator of the USEPA for discharges occurring in the inland zone, and only the Commandant of the USCG for discharges occurring in the coastal zone.

The response to a SONS event must be a coordinated response that integrates the FOSCs response organization with the SONS response organization. If a discharge occurs in the coastal zone and is classified as a substantial threat to the public health or welfare of the United States (40 CFR 300.320 (a) (2)), or the necessary response effort is so complex that it requires extraordinary coordination of federal,

state, tribal, local and private resources to contain and clean up the discharge, the Commandant may classify the incident as a SONS under the (NCP).

The NCP describes, in part, the federal government's responsibility for strategic coordination and support of FOSC when responding to a SONS. To meet these responsibilities, the lead agency may establish an ICS Area Command (ICS-AC).

Depending on the lead agency, the Commandant of the USCG or the USEPA Administrator may classify a discharge as a SONS. The Commandant or Agency Administrator may name an ICS Area Commander (ICS-AC). The ICS AC will establish an Area Command organization. Pursuant to 40 CFR 300.323, the ICS AC will:

- Communicate with affected parties and the public;
- Provide strategic coordination of federal, state, tribal, local and international resources at the national level; and
- This strategic coordination will involve, as appropriate, the National Response Team (NRT), the Regional Response Team (RRT), the Governor(s) of the affected state(s), and the mayor(s) or other chief executive(s) of local government(s). In addition, the NIMS AC will coordinate with the senior corporate management of the RP(s).

1420 NATIONAL RESPONSE FRAMEWORK

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

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

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

1430 NATIONAL RESPONSE TEAM ROLE IN INCIDENT RESPONSE

The NRT's membership consists of fifteen federal agencies with responsibilities, interests, and expertise in various aspects of emergency response to pollution incidents. The USEPA serves as chair; and the USCG serves as Vice-Chair, except when activated for a specific incident. The NRT is primarily a national planning, policy, and coordination body and does not respond directly to incidents. The NRT provides policy guidance prior to an incident and assistance as requested by an FOSC via an RRT during an incident. NRT assistance usually takes the form of technical advice, access to additional resources/equipment, or coordination with other RRTs. The following is a list of NRT members and their functions:

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

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

Federal Emergency Management Agency (FEMA):
FEMA provides guidance, policy, and program advice, and technical assistance in hazardous materials and radiological emergency preparedness activities (planning, training, and exercising) to state and local governments. During responses, FEMA provides advice and assistance to the lead agency on coordinating relocation assistance and mitigation efforts with other federal agencies, state, and local

governments, and the private sector. FEMA may enter into an agreement with the appropriate political entity to implement relocation assistance during responses.

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

Department of Energy (DOE):
Except as otherwise provided in Executive Order 12580, the DOE provides FOSC/RPMs that are responsible for taking all response actions with respect to releases of hazardous substances where either the release is on, or the sole source of the release is from, any facility or vessel under its jurisdiction, custody, or control. In addition, under the NRF, the DOE provides advice and assistance to other FOSC/RPMs for emergency actions essential for the control of immediate radiological hazards.

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

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

Department of Health and Human Services (HHS):
The HHS is responsible for providing assistance on matters related to the assessment of health hazards at a response and protection of both response workers and the public's health. The HHS is delegated authorities under CERCLA relating to a determination that illness, disease, or complaints may be attributable to exposure to a hazardous substance, pollutant, or contaminant. Agencies within HHS that

have relevant responsibilities, capabilities, and expertise are the Agency for Toxic Substances and Disease Registry (ATSDR) and the National Institutes for Environmental Health Sciences (NIEHS).

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

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

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

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

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

Nuclear Regulatory Commission (NRC):
The Commission responds, as appropriate, to releases of radioactive materials by its licensees, in accordance with the NRC Incident Response Plan (NUREG-0728). In addition, the NRC will provide

advice to the FOSC/RPM when assistance is required in identifying the source and character of other hazardous substances releases where the commission has licensing authority for activities utilizing radioactive materials.

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

1430.1 REGIONAL RESPONSE TEAM (RRT) ROLE IN INCIDENT RESPONSE

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

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

1430.2 CANUSLAK AND THE CROSSBORDER CONTINGENCY PLAN

Link to CANUSLAK Annex

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

Annex One of the Canada-United States Joint Marine Contingency Plan (CANUSLAK), as mentioned or reviewed, shall be maintained in force for the Great Lakes. The USCG and the Canadian Coast Guard shall, in cooperation with other affected parties, identify and provide detailed Supplements for areas of high risk and of particular concern in augmentation of CANUSLAK. It shall be the

responsibility of the USCG and the Canadian Coast Guard to coordinate and to maintain the Plan and the Supplements appended thereto.

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

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

- U.S. Customs and Border Protection (CBP)
- Canada Border Services Agency (CBSA)
- U.S. Immigrations and Customs Enforcement (ICE)
- Citizenship and Immigration Canada (CIC)

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

1440 INCIDENT MANAGEMENT

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

The CONTINGENCY PREPAREDNESS PLANNING MANUAL, VOLUME 4: INCIDENT MANAGEMENT AND CRISIS RESPONSE, COMDTINST M3010.24 describes the USCG connectivity to NIMS and the NRF. It mandates specific preparedness and response management activities within the USCG to ensure connectivity with all levels of interagency governance during disaster preparedness and response activities.

1440.1 NATIONAL INCIDENT MANAGEMENT SYSTEM

The NIMS is a systematic, inclusive approach to guide departments and agencies at all levels of government, NGO, and the private sector for working together seamlessly and assimilating divergent capabilities, cultures, and objectives for incidents spanning all hazards—regardless of cause, size, location, or complexity—in order to reduce loss of life, harm to the environment, and loss of property.

The NIMS is guided by four principles that establish the fundamental basis for influencing incident management practice in the United States and promoting a universal culture for managing emergencies. Each principle provides a clear and consistent lens through which to understand and use NIMS while also framing the ongoing implementation of NIMS across jurisdictions and organizations. These principles are: Universal Applicability, Standardization, Scalability, Flexibility, Adaptability, and Unity of Effort.

1440.2 INCIDENT COMMAND SYSTEM

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

a. Common Terminology;
b. Modular Organization;
c. Management by Objectives;
d. Incident Action Planning;
e. Manageable Span of Control;
f. Incident Facilities and Locations;
g. Comprehensive Resource Management;
h. Integrated Communications;
i. Establishment and Transfer of Command;
j. Chain of Command and Unity of Command;
k. Unified Command;
l. Accountability;
m. Dispatch/Deployment;
n. Information and Intelligence.

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

A principle ICS reference is the: Incident Management Handbook (IMH), although multiple agencies have ICS guides available for use. The IMH is an excellent reference to keep and use during a response. In addition, see Section 2000 for more guidance on ICS and UC issues.

1450 AREA EXERCISE MECHANISM

The opportunity to exercise this plan and components of this plan presents itself via the National Preparedness for Response Exercise Program (PREP). The PREP guidelines satisfy the exercise

requirements for USCG, USEPA, PHMSA and BSEE. The PREP was developed to establish a workable exercise program, which meets the intent of OPA 90 for spill preparedness. PREP was developed to provide a mechanism for compliance with exercise requirements, while being economically feasible for government and oil industry to adopt and sustain. PREP is a unified federal effort and satisfies the exercise requirements for all federal agencies, which adheres to its guidelines. PREP represents minimum guidelines for ensuring adequate response preparedness. Additional information on PREP can be found by within the NPREP Guidelines.

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

Commercial vessel and waterfront facility response plan holders are required to meet the pollution response exercise requirements under OPA 90. Although participation in PREP satisfies these requirements, PREP is a strictly voluntary program. Plan holders are not required to follow PREP guidelines and, if they choose not to, may develop their own exercise program that complies with regulatory exercise requirements. ACP holders (USCG/USEPA) are required to follow PREP guidelines.

The PREP Guidelines outline the frequency and types of exercises plan holders should conduct to meet exercise requirements of the appropriate response plan regulations and how plan holders can take credit for exercises when they respond to an actual incident.

See Section 9410 for the Western Lake Superior PREP Exercise History Matrix.

1500 STATE/LOCAL RESPONSE SYSTEMS

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

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

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

States are encouraged to enter into cooperative agreements pursuant to the applicable CERCLA sections to enable them to undertake actions authorized under subpart E of the NCP. Requirements for entering into these agreements are included in subpart F of the NCP. A state agency that acts pursuant to such agreements is referred to as the lead agency. In the event there is no cooperative agreement, the lead agency can be designated in a Memorandum of Agreement (MOA) or other agreement.
Because state and local public safety organizations would normally be the first government representatives at the scene of a discharge or release, they are expected to initiate public safety measures that are necessary to protect public health and welfare and that are consistent with containment and cleanup requirements in the NCP, and are responsible for directing evacuations pursuant to existing state or local procedures.

State and local public safety agencies 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. Minnesota, Wisconsin, and Michigan have emergency management and environmental departments within their respective governments. The health, safety and welfare of each state's citizens and natural resources are of paramount concern. Minnesota, Wisconsin, and Michigan are responsible for the control of pollutants that may impact the air, waters, and lands within their state.

1510 MINNESOTA

Department of Public Safety, Division of Homeland Security and Emergency Management

Minnesota Division of Homeland Security and Emergency Management (MN HSEM) serves as the state's primary homeland security agency and collects, analyzes and distributes homeland security information. MN HSEM coordinates "all hazards" planning between federal, state, tribal, and local officials and stakeholders throughout Minnesota. Within the WLS ACP area is: Region 2 - Northeast – covering: Carlton, Cook and St. Louis counties. Region 3 Northwest – while within the COTP Duluth zone, it is not in the WLS ACP area.

Minnesota HSEM has primary responsibility for the development and maintenance of the Minnesota Emergency Operations Plan (MEOP). This plan is an all-hazard document, which is intended to facilitate a coordinated state government response to a major emergency or disaster. The MEOP focuses on the assignment of emergency responsibilities to state agencies, and on general operations policies. The assignment of responsibilities is made relative to fourteen key emergency functions listed below:

Notification and Warning; Incident Management; Public Information;
Accident/Damage Assessment; Search and Rescue; Health Protection;
Medical Services; Fire Protection; Evacuation/Traffic Control/Security;
Mass Care; Debris Clearance; Public Works and Utilities Restoration
Environmental Hazard Response; Resource Management;

MEOP details the proper procedures for emergency operations as required at the state level. The plan does not describe the emergency responsibilities of federal government agencies, local government agencies or voluntary organizations, but does reference the relationship between these entities and state government. MEOP is meant to integrate the planning procedures that are described in the local, municipal and county plans and can be used in conjunction with the ACP to further understand the manner in which the emergency responsibilities interrelate at each level.

The state of Minnesota has devised a response system with a State Duty Officer (SDO) whom can be notified 24 hours a day of pollution incidents, natural disasters or other catastrophic events. The SDO is the central resource point for large incidents that exceed the capabilities of local responders. The SDO will coordinate resources with local authorities and the FOSC or state delegated OSC representative. More information on Minnesota Division of Homeland Security and Emergency Management can be found at the HSEM website.

Minnesota Pollution Control Agency (MPCA)

Minnesota Pollution Control Agency **(**MPCA**)** is the state's primary response agency. The MPCA's primary role is prevention of and response to significant or imminent threats to the environment and the public health. MPCA may also be involved in a support role to other agencies in protecting public safety and property. Authority of MPCA to respond to Environmental Emergencies: Section 115.061 of the Minnesota Statutes provides that all discharges of any quantity of any material, which may pollute waters of the state, must be reported to MPCA. It also requires that the person responsible for the discharge recover the material "as rapidly and as thoroughly as possible" and take other actions to minimize or abate the pollution resulting from the discharge.

MPCA Regional Offices:

Brainerd Office	7678 College Rd , Suite 105 Baxter, MN 56425	(218) 828-2492	(218) 828-2594
Detroit Lakes Office	714 Lake Avenue; Suite 220 Detroit Lakes, MN 56501	(218) 847-1519	(218) 846-0719
Duluth Office	525 Lake Ave. South Suite 400 Duluth, MN 55802	(218) 723-4660 (218) 302-6609	(218) 723-4727 (Fax)
Mankato Office	12 Civic Center Plaza; Ste 2165 Mankato, MN 56001	(507) 389-5977	(507) 389-5422 (Fax)
Marshall Office	504 Fairgrounds Rd Suite 200 Marshall, MN 56258	(507) 537-7146	(507) 537-6001 (Fax)
Rochester Office	18 Wood Lake Drive SE Rochester, MN 55904	(507) 285-7343	(507) 280-5513 (Fax)
St. Paul Office	520 Lafayette Road St. Paul, MN 55155-4194	(651) 296-6300	
Willmar Office	1601 East Hwy 12, Suite 1 Willmar, MN 56201	(320) 214-3786	(320) 214-3787 (Fax)

Section 115B.17 (Minnesota Environmental Response and Liability Act, or “state superfund”) reiterates the liability of the person responsible for the discharge to take removal and remedial actions. The law directs the Agency to protect public health, welfare, or the environment. This implies an agency obligated to respond to the discharge, assess further response needs, and oversee all actions taken to meet those needs. In the absence of responsible party action, the MPCA is authorized to take such

reasonable and necessary action itself. Subdivision 8 of the same section states that the Department of Agriculture will act in the place of the MPCA for any incidents involving the release of fertilizers or pesticides.

Section 116.07 authorizes the Agency to adopt rules and standards that prevent, abate, or control water, air, and land pollution. Minnesota Rules Chapter 7005 delineates release concentrations, which are deemed to pose an environmental or human health hazard. There are at present no administrative rules specifying agency procedures or responsibilities with respect to emergency response.

Section 116.11 authorizes the Agency to order the immediate discontinuance of an action or operation, which pollutes air, land, or water to such an extent, that it poses an imminent and substantial danger to public health and welfare.

Governor's Executive Order 90-2 gives the MPCA the following duties with respect to hazardous materials incidents:

- Act as lead response agency for most incidents;
- Coordinate state contractor actions at superfund sites;
- Provide public information services for MPCA led incidents;
- Coordinate long-term site cleanups;
- Provide damage assessment assistance to other state agencies;
- Assist other agencies in tracking waterborne spills;
- Act as liaison with wastewater treatment facilities;
- Provide laboratory support for incidents involving air releases;
- Assist state health officials with public health risk assessments; and
- Arrange for or oversee disposal of debris, etc., resulting from an incident.

The Executive Order outlines the duties and capabilities of other state agencies in similar fashion. It should be pointed out that, by statute, the Minnesota Department of Agriculture performs the duties listed above in the case of incidents involving agricultural chemicals. MPCA may assist with these duties as requested by the Department of Agriculture.

MPCA's Emergency Response Team (ERT) includes eight full-time ERT members whose primary duty is to monitor the cleanup of spills and other emergency situations that 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, and tire dump fires). In addition to receiving release reports, the ERT may perform field inspections at spill sites, provide technical assistance to responsible parties, or carry out enforcement actions for violations of state laws and rules.

If necessary, ERT 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, the ERT 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 of suspension of state laws and rules (e.g. allowing

emergency wastewater discharges or the burning of a spilled product in order to minimize overall environmental damage). The assistance may also include activation of contractors using state funds.

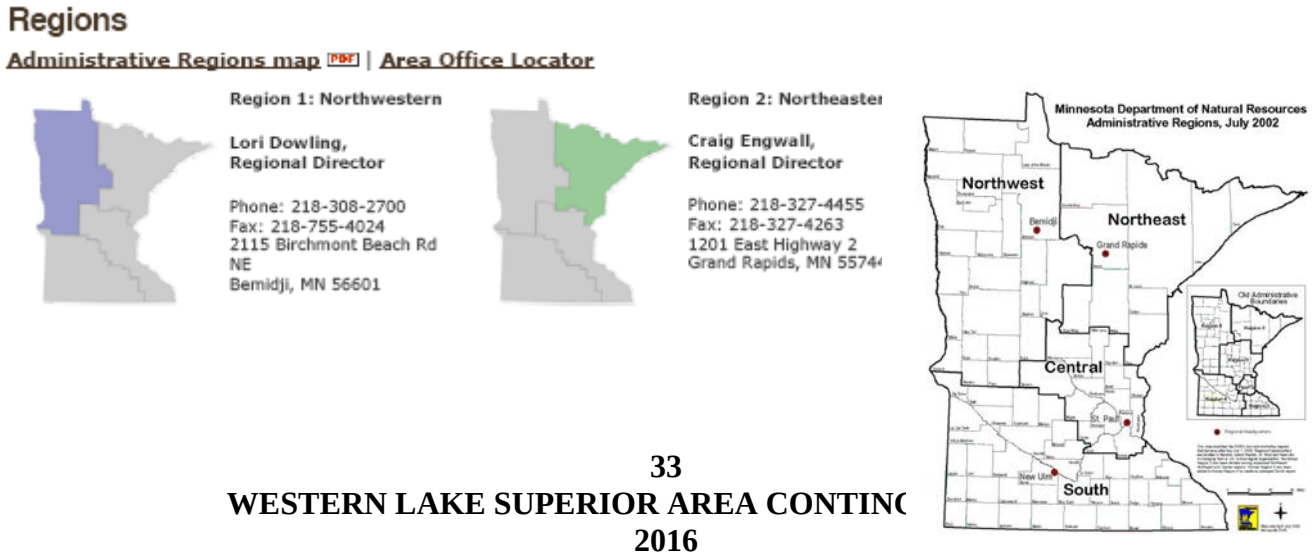
Note: More information on is located at the Minnesota Pollution Control Agency website.

Minnesota Department of Natural Resources (MN DNR)

The Minnesota Department of Natural Resources (MN DNR) is co-trustee with the Minnesota Pollution Control Agency (MPCA) for the natural resources of the State of Minnesota, as declared by the Governor, and a co-trustee with the United States Fish and Wildlife Service concerning the management of migratory waterfowl. The MN DNR is charged with control of all public lands, parks, timber, waters, minerals, and biota of the state. This includes the protection, preservation, and propagation of the fish and wildlife of the state. In response to a spill event, MN DNR personnel (conservation officers, biologists, and managers) have some of the following responsibilities:

- Notify all necessary MN DNR personnel and establish a response protocol describing the role of responders.
- Coordinate effort with other responding trustees, such as MPCA and the USFWS.
- Provide responders with specific fish and wildlife habitat information within the ACP area concerning all lakes, streams, wetlands, and rivers. The MN DNR will also consult with the responders as to the best locations for staging and recovery areas as well as access points.
- Provide responders with critical habitat information for state-listed threatened and endangered species as well as information on sensitive natural communities and special concern species found in the ACP area.
- Provide the responder with technical assistance and expertise on potential effects of oil and hazardous substances on fish and wildlife and their habitats.
- Coordinate wildlife rescue and rehabilitation efforts in cooperation with the USFWS.
- Assess injury to natural resources during (as circumstances allow) and after a spill. Data acquired is be used to determine the extent of injury to natural resources, to develop restoration or replacement strategies, and to develop and submit a claim for damages to the RP.

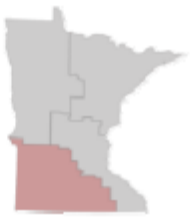
More information on Minnesota Department of Natural Resources can be found at their website.



Region 3: Central

Keith Parker,
Regional Director

Phone: 651-259-5800
Fax: 651-772-7977
1200 Warner Road
St. Paul, MN 55106



Region 4: Southern

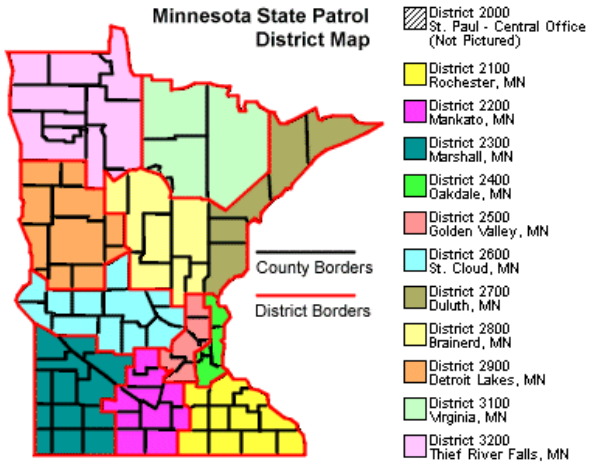
Dennis Frederickson,
Regional Director

Phone: 507-359-6000
Fax: 507-359-6018
261 Highway 15 South
New Ulm, MN 56073

Region I (Bemidji)	2115 Birchmont Beach Road NE, Bemidji, MN 56601	(218) 308-2700	(218) 755-4024 (Fax)
Region II (Grand Rapids)	1201 East Highway 2 Grand Rapids, MN 55744	(218) 327-4455	(218) 327-4263 (Fax)
Region III (St. Paul)	1200 Warner Rd. St. Paul, MN 55106	(651) 259-5800	(651) 772-7977 (Fax)
Region IV (New Ulm)	261 Highway 15 South New Ulm, MN 56073	(507) 359-6000	(507) 359-6018 (Fax)

Minnesota Department of Public Safety – State Patrol (MNSP)

State Patrol (MNSP), within the Department of Public Safety has statewide law enforcement powers and primary responsibility for highway safety and traffic enforcement. However, the State Patrol, when called upon for large-scale emergencies can be directed by the Governor to assist local law enforcement agencies to suppress civil unrest. The Duluth District 2700 covers all Minnesota areas within the COTP zone. Additional information can be accessed at the Department of Public Safety website.



Minnesota Department of Agriculture (MDA)

This department is responsible for handling incidents involving pesticides and fertilizers. Based in St. Paul, the MDA mission is to enhance Minnesotans' quality of life by ensuring the integrity of our food supply, the health of our environment, and the strength of our agricultural economy. MDA has existed in one form or another for more than 100 years. During that time, the state has changed from a mostly rural society with an economy based on agriculture and mining to a multifaceted state dominated by a world-class metropolitan area. As the state has changed, so has our department. MDA's three general areas of responsibility include: Protecting our food supply; protecting our natural resources; and Cultivating our agricultural economy. Additional information is located on the MDA website.

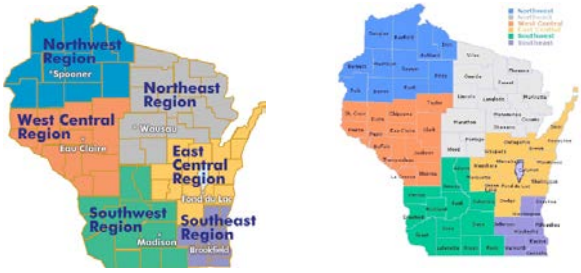
1520 WISCONSIN

Wisconsin Emergency Management (WEM)

In Wisconsin, Emergency Management is divided into regions and responsibilities delegated down to each County Emergency Management Director. The regions are listed on the map on the next page.

The Wisconsin Emergency Management (WEM) uses an all-hazard approach to emergency planning to prepare for emergencies that could threaten the state. Each year Wisconsin signs a Comprehensive Cooperative Agreement with the federal government, committing the state and local municipalities to certain emergency management objectives for the year. The Regional Offices are listed below and coincide with the Law Enforcement Emergency Coordinator's boundaries that are displayed on the map on the next page. Additional information is located on the Wisconsin Emergency Management webpage.

State of Wisconsin Emergency Management Regions:



Northwest Region **Randy Books** Anita Smith	**P.O. Box 126** **Spooner, WI 54801**	**(715) 635-8704** (715) 635-2498	**(715) 635-7030**
Northeast Region Janell Rucinski	2805 Martin Ave. Wausau, WI 54401	(715) 845-9517	(715) 842-3133
Southeast Region Ben Schliesman Linda Coogan	21115 Highway 18 Waukesha, WI 53186	(262) 782-1515 (262) 782-1515	(262) 782-1603
East Central Region Steve Fenske Becky Powers	Hwy 41/151 State Patrol Bldg. P.O. Box 984 Fond du Lac, WI 54936-0984	(920) 929-3730	(920) 929-2910
West Central Region Lisa Olson-McDonald	5005 Highway 53 South Eau Claire, WI 54701	(715) 839-3825	(715) 834-8392
Southwest Region Paul France	2400 Wright Street Madison, WI 53707	(608) 242-5389	(608) 242-3332

WEM directly administers federal funding assistance through the Emergency Management Assistance program. Wisconsin lies in Federal Emergency Management Agency (FEMA) Region V that also includes Minnesota, Indiana, Ohio, Michigan and Illinois.

WEM delivers numerous other services to local governments. The staff meets regularly with key state agency personnel and local officials. WEM area directors meet monthly with local officials to review policies and formulate operating procedures to ensure a coordinated state response to requests for help. To reach their goals, WEM relies heavily on personnel and resources of other state and local government agencies and uses trained volunteers at state and local levels to cope with disasters. A state agency core team was formed to develop and maintain the state emergency operations plan, composed of representatives of:

- Division of Emergency Management
- Department of Health and Social Services
- Department of Natural Resources
- Department of Military Affairs
- Department of Transportation
- Department of Agriculture, Trade and Consumer Protection

Other state agencies also have specific responsibilities in emergencies, including:

- Department of Industry, Labor and Human Relations
- Department of Vocational, Technical and Adult Education
- Department of Public Instruction
- Public Service Commission

When the Governor declares an emergency, any number of these agencies could be called upon to function from the state emergency operating center:

- Emergency Operations Center
  2400 Wright Street
  Madison, WI 53707-7865

The state Emergency Management Administrator provides overall direction in his or her role as the Governor's chief of staff during an emergency.

Wisconsin operates eight self-contained Emergency Operating Centers (EOCs) with statewide communications capabilities and auxiliary power units. All facilities are below ground, and seven are located in State Patrol district headquarters.

During disasters, WEM evaluates all state and local requests for assistance and, if appropriate, recommends them to the Governor. This procedure is especially critical when local officials need help from the National Guard, a request that must be processed in timely fashion.

In addition, the division maintains constant contact with such federal agencies as FEMA, the National Weather Service, the U.S. Army Corps of Engineers, the U.S. Department of Agriculture, the Nuclear Regulatory Commission, and volunteer groups such as the American Red Cross, the Menomite Disaster Service, the Salvation Army and the Civil Air Patrol. This diversity of resources is needed to assist stricken area in a variety of disasters.

State and local government must be able to respond to emergencies, their respective emergency management officials must maintain their awareness and continue to promote and exercise an efficient emergency management program across the state. To sustain a viable, effective program, one requisite is a full-time emergency management director in each county for continuity of programs. In Wisconsin, they do not have full-time directors in every county.

Wisconsin Department of Natural Resources (WDNR)

The Wisconsin Department of Natural Resources (WDNR) has been given the responsibility for pollution responses. The DNR has statutory authority for responding to the discharge of a hazardous substance in Section 292.22 Wis. Stats. This statute also requires responsible parties to take actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands or waters of the state. Specifically, where responsible parties are not taking actions necessary, the department or its authorized representative may identify, locate, monitor, contain, remove or dispose of the hazardous substance or take any other emergency action that it deems appropriate under the circumstances. The department may enter any property, premises or place at any time for the purposes of taking removal or other emergency action if the entry is necessary to prevent increased damage to the air, land or waters of the state. Notice is not required if the delay would result in imminent risk to public health, safety of the environment.

The statute also provides for reimbursement of department costs by responsible parties, and grants the department the authority to issue an emergency order or special order to the person possessing, controlling or responsible for the discharges to take the actions deemed necessary by the department.

State of Wisconsin Department of Natural Resources Regions:

State Spill Response Team – The DNR manages the spills program through the State Spill Response Team. This team is comprised of a State Spill and Federal Removal Coordinator, a State Emergency Management Coordinator, State Duty Officer 5 Regional Spill Coordinators, and legal counsel. Through the interactions of these staff, we identify and resolve issues to make the spill response program as effective as possible.

Wisconsin Spill Hotline (24 Hr.)		**(800) 943-0003**
Northern Regional Spill Coordinator	**John Sager (Primary)** **Phil Richard (Secondary)**	**(715) 392-7822** **(715) 762-1352**
Northeast Regional Spill Coordinator	Beth Erdman	(920) 303-5410
Southeast Regional Spill Coordinator	Scott Ferguson	(414) 263-8685
South Central Regional Spill Coordinator	Mike Schmoller	(608) 275-3303
West Central Regional Spill Coordinator	Tom Kendzierski	(715) 839-1604
Spills Team Leader & Federal Removals Coordinator	Jason Lowery	(608) 267-7570
State Emergency Response Coordinator	David Woodbury	(608) 266-2598
Legal Counsel	Lacy Cochart	(608) 267-0846

Activating a DNR Response: When calls are made to the spill hotline (800-943-0003) during the day, the information comes directly to the DNR call center in Madison, Wisconsin, and is forwarded to the

Regional Spills Coordinator for follow-up. During the evening and night hours, the phone calls are directed to the State Patrol, who will forward the information to a DNR Duty Officer. The Duty Officer may call the On-Call Spill Coordinator and/or local warden if necessary. The Duty Officer and the On-Call Spill Coordinator will determine the level of DNR response and will dispatch DNR personnel as necessary. Depending on the nature of the spill, local officials may also be activated to assist at the scene. These officials can be fire department staff, HAZMAT specialists, or local police or sheriff department staff.

When DNR receives notification of a spill, follow-up may include additional phone calls to get more information about the nature of the spill, going to the site, requesting other DNR assistance (i.e. fish managers, water resources staff), or when an emergency situation occurs and the responsible party is not available or willing to take action, calling in the DNR Zone Contractor to respond to the spill.

If an on-site response is necessary, the first responders to a hazardous substance spill for the DNR typically are the DNR wardens. Wardens are local – each county has at least one warden working within the county. DNR Wardens with the assistance of the Regional Spill Coordinator, Duty Officer and On-Call Spill Coordinator have training and experience in response activities and can assist Federal OSC's and local emergency response personnel and the responsible party manage the spill and coordinate an appropriate response..

The DNR has contracted with emergency response companies to provide statewide emergency response services to discharges of hazardous substances when responsible parties are unable or unwilling to take necessary actions to respond to an emergency situation. These companies can provide an initial response within 2 hours of notification, and specialize in emergency response, spill containment and cleanup. They are able to assess a situation, take actions to minimize harm to the public or the environment, sample and characterize spilled material or contents of abandoned containers, containerize and remove spilled substances from the spill site to a secure facility until analyses are completed to determine disposal. At the conclusion of the response, the department seeks cost recovery from the responsible party. More information is located at the Wisconsin Department of Natural Resources website.

Wisconsin State Patrol (WSP)

Wisconsin State Patrol (WSP) is an agency within the state Department of Transportation whose primary mission is highway safety, traffic enforcement and motor carrier code enforcement. This agency has statewide law enforcement authority and, when called upon, assists local law enforcement agencies through civil disturbance countermeasures, natural disaster recovery support, and communications services. WSP District 7, Spooner, WI covers all areas of Wisconsin in or adjacent to COTP Duluth zone.

Wisconsin State Patrol Regions:

1530 MICHIGAN

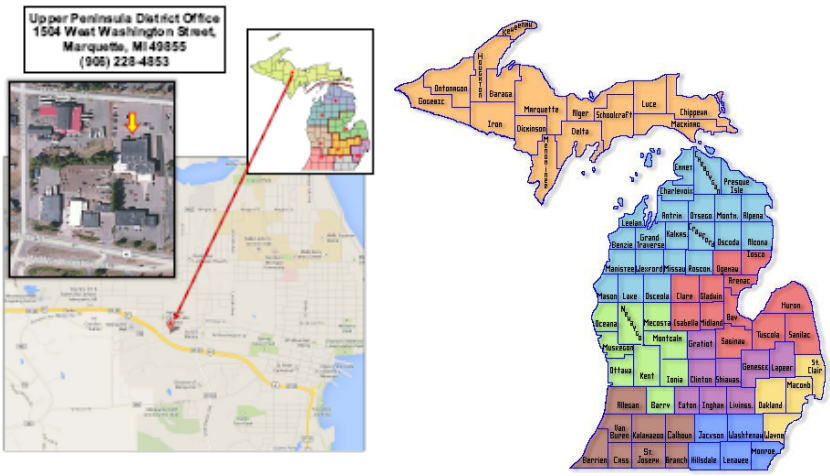
Department of Environmental Quality (DEQ)

Michigan Department of Environmental Quality (DEQ) is the primary environmental emergency response agency in the state in all non-agricultural-related spills. Legislation has designated the Michigan Department of Agriculture as the primary response organization in spills involving agricultural chemicals in close association with DEQ. Michigan DEQ administers programs and enforces laws that protect public health and promote the appropriate use of, limit the adverse effects on, and restore the quality of the environment. DEQ Water Programs establish water quality standards, assess water quality, provide regulatory oversight for public water supplies, issue permits to regulate the discharge of industrial and municipal wastewaters, monitor state water resources for water quality, habitat, aquatic health, and compliance with state laws. The Upper Peninsula District Office, in Gwinn, MI, covers all Michigan areas within COTP Duluth zone. A field office is located in Calumet.

DEQ has personnel located in eight Field Operations Districts, which are situated throughout the state. The primary response role of DEQ is one of technical advisor. These personnel are responsible for complaint investigation and emergency spill response and generally oversee the environmental aspects of spill containment, control, and mitigation. Appropriately trained staff within DEQ can provide hands-on response with absorbents and boom if the situation requires this type of response. It is anticipated, that local units of government and various HAZMAT Response teams located throughout the state, although predominantly in the lower third of the peninsula, will conduct all “first responder” response. Environmental mitigation associated with material spills will generally be conducted by the RP. If the RP cannot be identified or is reluctant to adequately address mitigation needs, the state can hire contractors to perform the mitigation. A limited amount of money is available through funds administered by the DEQ Environmental Response Division. The state can also access the Federal Fund administered under OPA in accordance with federal guidelines and regulations. The State of Michigan has a responder immunity act. DEQ, in conjunction with the Department of Attorney General, is the

designated Natural Resources Trustee for the state. More information is located at the Michigan Department of Environmental Quality website.

Michigan DEQ District Map



DEQ Water Resources Division 1504 W. Washington Street Marquette, MI 49855	Mr. Steve Casey (Primary) Mr. Randy Conroy	(906) 235-5771 (906) 236-1362
Calumet, MI	Ms. Amy Keranen	(906) 337-0389

Michigan Department of Natural Resources (DNR)

MDNR is the lead agency for the state in decisions involving fish and wildlife issues during a spill response working cooperatively with DEQ State OSC. Department of Natural Resources (DNR) enforces Michigan's hunting, fishing and natural resource laws and regulations. Their conservation officers are fully commissioned law enforcement officers who are responsible for protection of all natural resources and the environment, as well as the health and safety of the public. Within COTP Duluth zone are the Operations Service Center, Baraga, and the Operations Service Center, Marquette, MI. Additional information is located at the Michigan Department of Natural Resources website.

Michigan DNR Districts

Michigan State Police (MSP)

Emergency Management Division (EMD) serves as the designated emergency/disaster response coordination agency for the state and as the primary state contact point in the event of a declared disaster resulting in the activation of the State Emergency Management Plan. MSP as a department in the Michigan State Government, has statewide law enforcement and public safety authority, and is charged with a very broad spectrum of responsibility, spanning from traffic safety through all types of criminal investigations to emergency management and homeland security. The Homeland Security Coordinator is in Lansing, MI and the Emergency Management Coordinator, is out of Marquette, MI. Within the COTP Duluth zone there are Posts in Post Calumet, Post L'Anse, and Post Wakefield, MI. More information is located at the Michigan State Police website.

Michigan State Police Districts

Michigan Department of Agriculture (MDA)

MDA is the lead agency in spill response involving agricultural chemicals and/or fertilizers. The mission of the Michigan Department of Agriculture is, "To protect, promote and preserve the food, agricultural, environmental and economic interests of the people of Michigan." Additional information is located at the MDA website.

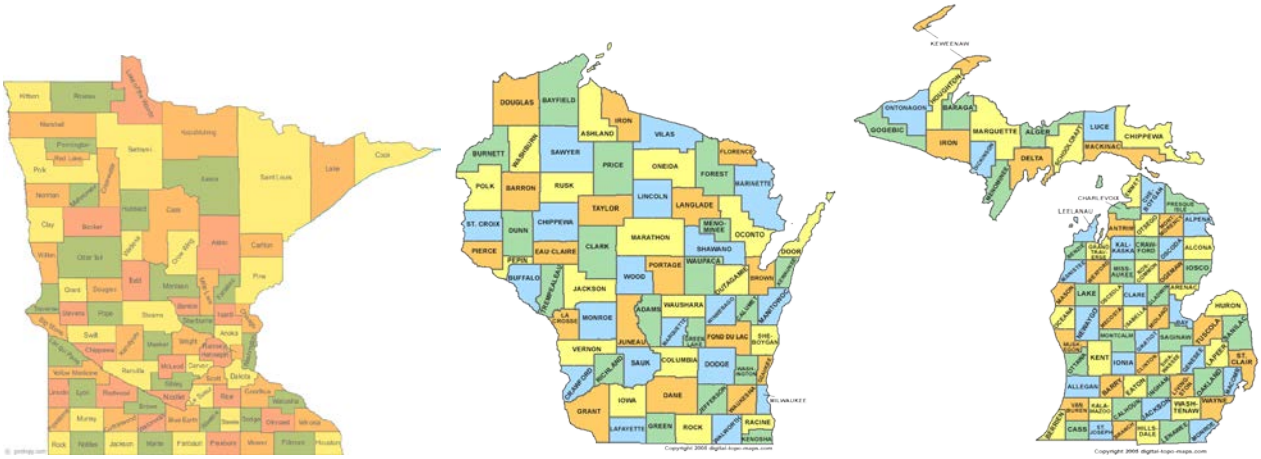
Michigan State Emergency Response Commission (SERC)

On May 2, 2007, Executive Order 2007-18 abolished the Michigan Emergency Planning and Community Right-to-Know Commission and created the Michigan Citizen-Community Emergency Response Coordinating Council. The order states that this new Council is designated as the state emergency response commission required under Section 301 of SARA Title III, and it will perform all of the duties of a state emergency response commission under the Act. The Council is created as an advisory body within the Department of State Police.

1540 COUNTY EMERGENCY MANAGEMENT SYSTEMS

Most County Emergency Management Systems consist of a manager of the incident, an *all-hazard emergency mitigation plan*, single points of contact at each level of government and within each department, and utilization of an EOC whenever an incident occurs requiring the coordination of local agencies. The designation of the Incident Commander (IC), the extent of coordination necessary, and the type of emergency coordination facility to be established depends on the nature and severity of the incident. The designated Incident Commander works within this emergency management system in implementing this emergency operations plan, relating standard operating procedures, and responding to the incident scene. Capabilities of the local agencies that respond to pollution incidents vary from county to county. Many of the counties participate in planning, coordination, and notification activities associated with hazardous chemical spills and other emergencies, including natural disasters. Traditional field response capabilities of fire and police departments, including traffic control, communications, and equipment support, are often useful during responses.

County Emergency Managers/Directors contact information is listed in Section 5220 and Appendix M-25.



1540.1 COOK COUNTY, MN

Organization

The Cook County Board of Commissioners is ultimately responsible for providing overall direction and control of county government resources involved in the response to a major emergency/disaster. The county Emergency Management Director serves in a staff capacity to the Board and coordinates all aspects of the county plan. Additional information is located at the Cook County website.

Direction and Control

Upon the occurrence or threat of an extreme emergency/disaster within the county, the Chair of the Board of Commissioners or their designee activates the Cook County Emergency Operations Center (EOC). Response activities are coordinated through the EOC to assure effective response and recovery.

Response Procedures

The Cook County Law Enforcement Center is the PSAP for Cook County and is responsible for the receipt and proper dissemination of all warnings/notifications. County fire departments are notified and respond to hazardous materials incidents within the limits of HAZMAT response training received. When response exceeds their capabilities, calls to the Minnesota State Duty Officer (SDO) will establish contact with the state or federal response agencies. Other state government and/or federal government agencies can also be accessed through the SDO as needed to provide the supplemental assistance until recovery is achieved.

Reference: Cook County All-Hazard Mitigation Plan

1540.2 LAKE COUNTY, MN

Lake County is represented by three main cities that are covered under what is called a "Common County Plan". What occurs is that Lake County prepares and maintains the emergency response plan and responsibilities and coordinates it with each of these cities. These cities are:

- Two Harbors (The County Seat)
- Silver Bay
- Beaver Bay

Additional information is located at the Lake County website.

Organization

In Lake County as in county government, the Lake County Board of Commissioners is ultimately responsible for providing overall direction and control of county government resources involved in response to a disaster. The office of the Lake County Sheriff and Lake County Emergency Management coordinates the Emergency Management plans.

Response Procedures

In Lake County, the Dispatch Center located in the law enforcement center is responsible for warning and notification within the county. Response agencies such as fire, rescue and law enforcement agencies, to name a few, are notified and advised to respond to an oil or hazardous material incident always keeping in mind their response is limited by the HAZMAT training received. Any event that exceeds the capability levels of the local responders will be turned over to the MN State Duty Officer in St. Paul. The State Duty Officer will provide appropriate contact and coordination with other state and federal Agencies.

Direction and Control

In the State of Minnesota, response agencies have been trained to respond and deal with situations using the National Incident Management System (NIMS). In situations involving shoreline oil or hazardous material incidents, most often initial control of an incident will be under the local control of the fire department. A local fire department will establish an Incident Commander and an Incident Command Center that will in most cases provide overall coordination for the event. Should the event dictate the need for the opening of the Lake County EOC, the Emergency Manager will coordinate that activity on behalf of Lake County.

Reference: Lake County Hazard Mitigation Plan

1540.3 ST. LOUIS COUNTY, MN

St. Louis County is represented by the following municipalities:

Aurora	Eveleth	McKinley
Babbitt	Floodwood	Meadowlands
Biwabik	Gilbert	Mountain Iron
Brookston	Hermantown	Orr
Buhl	Hibbing	Proctor
Chisholm	Hoyt Lakes	Tower
Cook	Iron Junction	Virginia
Duluth	Kinney	Winton
Ely	Leonidas	

Organization

The St. Louis County Sheriff is the appointed emergency management director for the county. Emergency management plans are coordinated by the Sheriff's Office Emergency Management Division. The county Emergency Management Division has jurisdiction throughout the county outside of cities who establish their own emergency management organizations. Additional information is located at the St Louis County website and within the St Louis County Hazard Mitigation Plan.

Response Procedures

Upon the occurrence or threat of an extreme emergency or disaster situation within the county jurisdiction, the St. Louis County Emergency Operations Center (EOC) is activated by the Chairman of the Board of Commissioners, the County Administrator, or the Sheriff. Response activities are coordinated through the EOC to assure effective response and recovery. Mutual aid agreements exist with local governments outside of St. Louis County. St. Louis County assists its municipalities when emergency response exceeds their local capabilities. Likewise, state government may supplement county resources as needed. Further, where response is beyond the capability of state and local resources, supplemental assistance from the federal government may be provided until recovery is achieved.

Direction and Control

Emergency response agencies in Minnesota organize their response under the principles outlined in the National Incident Management System (NIMS). In the event of an oil or hazardous materials incident, the local fire department designates an Incident Commander (IC) and establishes a command post for coordination of activities.

Reference: St. Louis County Hazard Mitigation Plan

1540.4 DOUGLAS COUNTY, WI

Organization
Local governments operate with normal relationships and authority. Agencies report to their respective boards or councils. Executive authority rests respectively with town chairs, village presidents, City Mayors and the County Board Chair. The County Emergency Management Coordinator serves as chief-of-staff to the County Board Chair for emergency management purposes.

The County has primary emergency management responsibility.

- Wisconsin Statute section 166.03(5) requires the County to exercise the lead emergency management role among local governments.
- Initial response resources in a major emergency come from various town, municipal, county and non-government agencies and private contractors.
- County coordinates planning, training, exercising and operations by local agencies.
- County emergency management office manages the system on behalf of the county executive or county board and coordinates among agencies and levels of government, including with the state through its Division of Emergency Management.

Activation of Emergency Operations
Town, municipal and county governments implement operations under the Douglas County Emergency Operations Plan. The county notifies and coordinates among agencies and governments to mobilize and deploy additional resources. They functionally integrate response agencies from all levels into a unified emergency organization, led by an Executive Group consisting of the chief executive of each jurisdiction and other key officials. The county coordinates among agencies to implement any needed warning, public information or protective action measures. In addition, the county coordinates activation of an Incident Command Post staffed by senior on-scene commanders or managers of response agencies for joint command and coordination of resources and activities at the incident site.

Activation of Emergency Operations Center (EOC)
When the EOC is activated by a county executive, it is staffed by representatives of local agencies with authority to commit agency resources. The EOC provides command and coordination of agency mobilization, policy oversight and support of field operations on behalf of the Executive Group. Local agencies provide the resources and services needed, coordinated through the EOC and Command Post. Resources will be demobilized as the situation is downgraded to responsibility of local municipalities.

Reference: Douglas County Emergency Operations Plan (EOP)

1540.5 BAYFIELD COUNTY, WI

Bayfield County Emergency Management utilizes planning, training and coordination to continually develop the mitigation, preparedness, response and recovery capabilities of the county's cities, towns, tribe and village. These four-phases of emergency management are intended to identify and coordinate

available resources to deal with emergencies effectively, thereby saving lives, avoiding injury and minimizing economic loss.

Reference: Bayfield County Emergency Operations Plan (EOP)

1540.6 ASHLAND COUNTY, WI

Emergency Management Division. Employs a Program Director (management) under the general supervision of the Undersheriff (management). All four sections are under the general supervision of the Sheriff and Undersheriff. All department initiatives, policies, procedures, monetary functions and formal discipline are executed by the Sheriff and/or Undersheriff and the management team. The Sheriff's Department also has a number of supporting staff which include the Secretary Bookkeeper, a half-time Domestic Violence Liaison and a half-time maintenance person. Inmate Nursing Services are contracted through the County Health Department (division of HHSD) and the inmate food service is contracted through a private company. Additional information is located at the Ashland County website.

Reference: Ashland County Emergency Operations Plan (EOP)

1540.7 IRON COUNTY, WI

Information on Iron County is located on their website.

Reference: Iron County Emergency Operations Plan (EOP)

1540.8 GOGEBIC COUNTY, MI

The largest unit of local government in Michigan today is the County. It is also the oldest political subdivision of the State having attained stature and importance before any other form of government now in existence. Most of the functions of County Government are performed by officials elected by the citizens of the individual county, which is as it should be. The general supervision of county governmental functions is performed by the County Board of Commissioners. The separate operating offices, departments and bureaus of County Government are in the charge of the separately elected officials. Information on Gogebic County is located at their website.

Reference: Gogebic County Emergency Actions Guidelines (EAG)

1540.9 ONTONAGON COUNTY, MI

Organization

The Ontonagon County Board of Commissioners is responsible for providing overall direction and control of county government resources involved in the response to a major emergency/disaster. The county Emergency Management Coordinator in a staff capacity to the Board and coordinates all aspects of the plan. Additional information is located at the Ontonagon County website.

Direction and Control
Upon the occurrence or threat of an extreme emergency/disaster within the county, the Chair of the Board of Commissioners or their designee in consultation with the Emergency Management Coordinator activates the Ontonagon County Emergency Operation Center (EOC). Response activities are coordinated through the EOC to assure effective response and recovery.

Response Procedures
The Ontonagon County Sheriff's Department is responsible for the receipt and proper dissemination of all warnings/notifications. In case of a HAZMAT or oil spill, the local fire department designates an Incident Commander (IC), usually the chief or his second in command. This person directs activities relating to the immediate incident response through a Command Post. In situations beyond the scope of the local jurisdiction, the Emergency Management Division of the Michigan State Police, is contacted and assists in the assessment of the necessary emergency measures to be taken. The Michigan DEQ will handle the state level environmentally protective aspects of an incident.

The Emergency Management Coordinator serves as a resource to the Incident Commander.

Reference: Ontonagon County Emergency Actions Guidelines

1540.10 HOUGHTON COUNTY, MI

Houghton County is represented by the following entities:

City of Houghton	*City of Hancock*
Duncan Township	*Torch Lake Township*
City of Houghton	*Elm River Township*
Calumet Village	*Franklin Township*
Laurium Village	*Hancock Township*
Copper City	*Laird Township*
Lake Linden	*Osceola Township*
South Range	*Portage Township*
Adams Township	*Quincy Township*
Calumet Township	*Schoolcraft Township*
Chassell Township	*Stanton Township*

Concept of Operations
The potential exists in Houghton County for many types of disasters and emergency situations to occur which could require activation of the County Emergency Action Guidelines (EAG). The Houghton County Office of Emergency Measures developed these Emergency Action Guidelines to describe how different government and non-government entities can interact with each other to respond effectively during any disaster or emergency situation. These Guidelines assign various emergency tasks that may or may not need to be performed during any emergency or disaster situation. Tasks are assigned to the organization(s) best suited to perform such tasks. This EAG consists of eleven Tabs/Annexes on Direction and Control; Warning; Communications; Public Information; Damage Assessments; Law

Enforcement; Fire Services; Public Works; EMS; Public Health; and Human Services. Additional information on Houghton County can be accessed at their website.

Response Procedures

Houghton County Office of Emergency Measures responds to enemy attack, natural disasters, and technological disasters that confront the county. The OEM consists of certain executive governmental officials, field forces of existing departments and agencies, Special Forces of volunteer groups and others, and specified private resources. Upon the occurrence or threat of an emergency situation or disaster, the OEM, the Houghton County EOP and the Emergency Operations Center (EOC) are activated by the declaration of a "state of emergency" by the Chairman of the Board of Commissioners. All response activities are coordinated through the EOC to assure effective response and recovery. Mutual aid agreements are utilized for support from other local governments. For those situations where response is beyond the capability of local government due to the severity and/or the need for special equipment or resources, state government may provide supplemental assistance. For such, the Governor declares a "state of disaster" activating state assistance (pursuant to the Michigan Preparedness Plan) and a State EOC is established for coordination of state disaster relief forces and for communications and coordination with the local EOC(s). Further, where response is beyond the capability of state and local resources, supplemental assistance from the federal government may be provided until full recovery is achieved.

Direction and Control

In the event of an oil or hazardous material incident, the local fire department will designate an Incident Commander (IC), usually the highest-ranking fire official at the scene. This person directs activities relating to the immediate incident response through an Incident Command Post. In accordance with the Fire Prevention Act (Act 207, P.A. 191, as amended), the Michigan State Police, in conjunction with the local fire department, assesses the situation and they jointly determine the emergency measures to be taken. Fire Departments in Houghton County will follow the National Fire Academy Incident Command System.

The Emergency Management Coordinator serves as a resource to the Incident Commander. If the incident becomes a "community emergency" involving many agencies and/or the public, the Emergency Management Coordinator will keep the Chief Executive and other levels of government informed and may activate the EOC, depending on the severity of the situation.

The Michigan State Police may establish a State Command Post to coordinate the state response to an incident, as described in the Michigan Emergency Management Plan. The Michigan DEQ will handle the state level environmentally protective aspects of an incident.

The Incident Commander is responsible for establishing the hot, warm, and cold zones. Certain activities take place depending upon the zone. The Incident Command Post and other facilities are located in the cold zone as designated by the Incident Commander.

Reference: Houghton County Emergency Actions Guidelines

1540.11 KEWEENAW COUNTY, MI

Concept of Operations

The potential exists in Keweenaw County for many types of disasters and emergency situations to occur which could require activation of the County Emergency Action Guidelines (EAG). The Keweenaw County Office of Emergency Measurers developed these Emergency Action Guidelines to describe how different government and non-government entities can interact with each other to respond effectively during any disaster or emergency situation. These Guidelines assign various emergency tasks that may or may not need to be performed during any emergency or disaster situation. Tasks are assigned to the organization(s) best suited to perform such tasks. This EAG consists of eleven Tabs/Annexes on Direction and Control; Warning; Communications; Public Information; Damage Assessments; Law Enforcement; Fire Services; Public Works; EMS; Public Health; and Human Services.

Additional information on Keweenaw County can be accessed at http://keweenawcountyonline.org.

Response Procedures

Keweenaw County Office of Emergency Measures (OEM) responds to enemy attack, natural disasters, and technological disasters that confront the county. The OEM consists of certain executive governmental officials, field forces of existing departments and agencies, Special Forces of volunteer groups and others, and specified private resources. Upon the occurrence or threat of an emergency situation or disaster, the OEM, the Keweenaw County EOP and the Emergency Operations Center (EOC) are activated by the declaration of a "state of emergency" by the Chairman of the Board of Commissioners. All response activities are coordinated through the EOC to assure effective response and recovery. Mutual aid agreements are utilized for support from other local governments. For those situations where response is beyond the capability of local government due to the severity and/or the need for special equipment or resources, state government may provide supplemental assistance. For such, the Governor declares a "state of disaster" activating state assistance (pursuant to the Michigan Preparedness Plan) and a State EOC is established for coordination of state disaster relief forces and for communications and coordination with the local EOC(s). Further, where response is beyond the capability of state and local resources, supplemental assistance from the federal government may be provided until full recovery is achieved.

Direction and Control

In the event of an oil or hazardous material incident, the local fire department will designate an Incident Commander (IC), usually the highest-ranking fire official at the scene. This person directs activities relating to the immediate incident response through an Incident Command Post. In accordance with the Fire Prevention Act (Act 207, P.A. 191, as amended), the Michigan State Police, in conjunction with the local fire department, assesses the situation and they jointly determine the emergency measures to be taken. Fire Departments in Keweenaw County will follow the National Fire Academy Incident Command System.

The Emergency Management Coordinator serves as a resource to the Incident Commander. If the incident becomes a "community emergency" involving many agencies and/or the public, the Emergency

Management Coordinator will keep the Chief Executive and other levels of government informed and may activate the EOC, depending on the severity of the situation.

The Michigan State Police may establish a State Command Post to coordinate the state response to an incident, as described in the Michigan Emergency Management Plan. The Michigan DEQ will handle the state level environmentally protective aspects of an incident.

The Incident Commander is responsible for establishing the hot, warm, and cold zones. Certain activities take place depending upon the zone. The Incident Command Post and other facilities are located in the cold zone as designated by the Incident Commander.

Reference: Keweenaw County Emergency Actions Guidelines (EAG)

1540.12 BARAGA COUNTY, MI

Concept of Operations

In Baraga County, any hazardous material incident will be handled by the local Fire Department in whatever Fire District it occurs. They will use the Incident Command System, or be expected to use it. The County will be available to aid with any agencies they will need. The general response capability and general procedures will be up to the Fire Department in charge. Any oil spills on Lake Superior or waters running into Lake Superior, the Coast Guard will be called. Any spills inland, or inland waters, the EPA will be called. For any incident, the EOC could be opened, or a command post set up near the incident. Additional Information is located at the Baraga County website.

Direction and Control

The County of Baraga developed Emergency Action Guidelines to describe how different government and non-government entities will interact with each other to respond effectively during any disaster or emergency situation. These guidelines assign various emergency tasks that may or may not need to be performed during any emergency or disaster situation. Tasks are assigned to the organization(s) best suited to performing such tasks. Refer to the County EOP for more specific information.

The Chief Executive Official and Emergency Management Coordinator are jointly responsible for coordinating the response to an emergency or disaster situation. The following positions are responsible for the Direction and Control Section of the Emergency Action Guidelines:

- Baraga County Board of Commissioners Chairperson
- Baraga County Emergency Coordinator

The Line of Succession for the Chief Executive Official during a community wide response to an emergency or disaster situation is:

- Baraga County Board of Commissioners Chairperson
- Vice Chair Person of Baraga County Board of Commissioners
- Baraga County Emergency Coordinator

The Line of Succession for the Emergency Management Coordinator during a response to an emergency or disaster is:

- Baraga County Emergency Coordinator
- Assistant Emergency Coordinator
- Fire Chief, Village of L'Anse

The Chief Executive Official should consider the following items during a response to an emergency or disaster situation (not all inclusive, see EOP):

- Open Emergency Operations Center.
- Declare a local "state of emergency" and, if necessary, issue directives as to travel restrictions on jurisdiction or local roads.
- Direct and coordinate response activities in accordance with EOP, including prioritizing allocation of scarce resources.
- Activate mutual aid agreements with neighboring jurisdictions.
- Recommend appropriate protective measures to provide for the health and safety of people and property.
- Review and authorize the release of information given to the public via the Public Information Official.
- Ensure all resources are made available for response.
- Maintain logs of actions taken and financial records.
- Keep legislative body informed of taken measures.
- Based on compiled data on the incident, requests the Governor to declare a "State of disaster or emergency".

Reference: Baraga County Emergency Action Guidelines (EAG)

1540.13 MARQUETTE COUNTY, MI

Organization

The Emergency Management office of Marquette County is a central point of contact for a wide range of emergency management activities. Emergency management staff is dedicated to working with public officials to improve our county's preparedness and increase our ability to respond to emergencies of all types. The ranking fire officer on scene will serve as the tactical Incident Commander (IC) and direct the on-scene tactical operations and coordinate efforts of all agencies involved in on-site emergency operations related to the incident. Hazardous materials incidents shall be managed utilizing the National Incident Management System (NIMS). In Marquette County, the basic unified command structure and organization will consist of:

- The Fire Department with jurisdiction for the incident site (Tactical Incident Commander).
- Local and County Emergency Management officials (Community Emergency Coordinators).
- Marquette County Health Department official(s).
- The licensed Emergency Medical Services and rescue organization having jurisdiction, including EMS Medical Control.

- The Law Enforcement agency having jurisdiction.
- The Michigan Department Environmental Quality will be requested to report to the incident scene, at which time he/she will be assigned to the Incident Command staff.
- The person or official in charge of involved facility (Facility Emergency Coordinator).
- Additional agencies as their involvement in the incident increases.

The Fire Department (IC), Emergency Management, Health Department, Law Enforcement, EMS, and DEQ representatives should be co-located at the Incident Command Post with direct access to the IC. Additional information on Marquette County can be accessed at their website.

Direction and Control

Overall management of an emergency or disaster situation will be accomplished from an emergency management facility, such as a command post (CP) or emergency operations center (EOC). A command post (CP) shall be established at the scene of any emergency incident to coordinate site response activities and resources. The following resources are available and may be requested to supplement local command post operations when additional facilities and communications capabilities are indicated:

- Marquette County Sheriff's Mobile Command Unit
- Michigan State Police Mobile Command and Communications Vehicle (Lansing, MI)

For localized incidents, personnel from the agency(s) with primary jurisdiction for incident command will be responsible for arranging necessary staffing of the on-scene command post. If an EOC has not been activated, the officials or representatives designated by each of the responding agencies may coordinate their agency's response from the command post. If an EOC has been activated, these representatives will generally report to the EOC, and assign individual(s) to the command post to coordinate and oversee on-scene tactical operations and response activities.

The use of a city or township level emergency operating center (EOC) should be considered if the situation is limited to a single jurisdiction and does not warrant county wide response. An EOC should be established for an emergency situation whenever the incident command post is not appropriate.

Upon receipt of information, the Marquette County Central Dispatch Center or other responsible agency, shall immediately contact the Marquette County Emergency Management Coordinator. If the situation is deemed to be of the magnitude that may require activation of the county EOC, the County Emergency Management Coordinator shall advise the Chairperson of the County Board and authorize activation of the county EOC.

EOCs for local units of government and Marquette County should be prepared for operations and staffed to the degree necessary:

- When the Chief Executive Official for the jurisdiction and/or local emergency management officials require an overview of an emergency situation, or when centralized strategic policy making, planning, support, information, and coordination is required to properly mitigate emergency or disaster conditions.
- Whenever natural or human caused conditions threaten to cause wide spread damage or significant harm and loss of life.

- When directed by the Governor of Michigan or the Emergency Management Homeland Security Division, Michigan State Police.
- Whenever national security emergency conditions are implemented by federal authorities. County and local EOCs should be capable of functioning continuously for the duration of the emergency. Each position within the EOC should have at least one alternate assigned. Shift changes will generally occur every eight to twelve hours.

Response Procedures
When an oil or hazardous materials incident occurs, notification of the incident can be received in several ways. Most incidents will be reported via 911 to the Marquette County Central Dispatch Center. The initial responding units (whether law enforcement, EMS, or fire) will be responsible for assessing the incident for potential hazards and immediately notifying the Marquette County Central Dispatch of an actual or suspected hazardous materials incident.

The first arriving emergency service units must immediately evaluate the situation for its potential danger to the safety and health of the initial responders and the at risk population in the immediate incident area. The area will be restricted immediately by law enforcement, fire, rescue, and EMS agencies until the danger or potential hazard can be more thoroughly assessed. A command post will generally be established at or near this site. All services and agency representatives initially called to the scene should be directed to this control point, or the designated staging area.

More detailed information on specific tasks and execution can be found in the Marquette County Emergency Action Guidelines (EAG).

Reference: Marquette County Emergency Action Guidelines

1600 NATIONAL POLICY & DOCTRINE

1610 PUBLIC AND PRIVATE RESOURCE UTILIZATION

OPA 90 reaffirmed the basic principle that the primary source of an oil spill preparedness and response system in the U.S. should be implemented and maintained by the private sector. It is not, nor should it be, the USCG or USEPA intent to compete with the commercial oil and hazardous materials pollution response industry. The utilization of government resources in lieu of commercial resources can place the government in a competitive environment. This is not the intent of OPA 90, as it defeats the incentive for commercial enterprise to maintain equipment and trained personnel in a competitive market. USCG's pre-positioned response equipment, other publicly owned response equipment, and other initiatives under the USCG's oil spill response program or be used if the commercial industry does not have readily available resources, and only until such time that the FOSC or the UC decides to release the resources. [Link to D9 Trailer INST 16465.1]

The FOSC has the authority and responsibility in accordance with the NCP to contain, control, and carry out response activities for the removal of a discharge where a substantial threat to public health or welfare, or where natural resources are endangered. At the direction and discretion of the FOSC and the

UC, when the RP executes a suitable response, any government equipment deployed should be withdrawn as commercial equipment becomes available and is placed into service.

The FOSC may consider using USEPA, USCG, DOD, or Oil Spill Cooperative resources in such instances when the spill has been federalized and/or private sector resources cannot respond to the incident in a timely manner, or there are certain specific resources not available from the private sector.

1620 BEST RESPONSE CONCEPT

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

The UC and their Command and General Staffs have a shared goal to achieve a “Best Response”. Ultimately, a “Best Response’ will minimize the adverse impacts and consequences of the incident, and maximize public confidence and stakeholder satisfaction. Under the “Best Response” model, a successful response must address several Key Business Drivers. Each of these Key Business Drivers is linked to certain Critical Success Factors – these are the things that a response should accomplish to be considered successful.

	Key Business Drivers	Critical Success Factors
RESPONSE ORGANIZATION	**Human Health & Safety**	No public injuries or hazardous exposures; No worker injuries or hazardous exposures; Health and safety concerns reported;
	Natural Environment	Source of discharge secured; Product contained; Sensitive areas protected; Resource damage minimized;
	Economy	Economic impact minimized
	Public Communication	Positive media coverage; Positive public perception; Accurate and timely information provided to the public;
	Stakeholder Service & Support	Minimize impact; Stakeholders well informed; Positive meetings; Prompt handling of claims;
	Organization	Implement an effective and efficient ICS organization; Mobilize and effectively use response resources;

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

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

1630 FISH AND WILDLIFE ACTS COMPLIANCE

1630.1 MIGRATORY BIRDS

A large number of international treaties and domestic laws have been enacted that provide protection for migratory birds. Legal authorities may be categorized as primary or secondary. Primary authorities are international conventions and major domestic laws that focus primarily on migratory birds and their habitats. Secondary authorities are broad-based domestic environmental laws that provide ancillary but significant benefits to migratory birds and their habitats.

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

Bald Eagle Protection Act of 1940
The Bald Eagle Protection Act provides for the protection of the bald eagle (the national emblem) and the golden eagle by prohibiting, except under certain specified conditions, the taking, possession and commerce of such birds. The 1972 amendments increased penalties for violating provisions of the Act or regulations issued pursuant thereto and strengthened other enforcement measures. Rewards are provided for information leading to arrest and conviction for violation of the Act.

Migratory Bird Treaty Act (MBTA) of 1918
The Migratory Bird Treaty Act (MBTA) implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico (1936), Japan (1972) and the Union of Soviet Socialists Republics (1976) further expanded the scope of international protection of migratory birds. Each new treaty has been incorporated into the MBTA as an amendment and the provisions of the new treaty are implemented domestically. These four treaties and their enabling legislation, the MBTA, established federal responsibilities for the protection of nearly all species of birds, their eggs and nests.

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

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

On November 26, 2003, the USFWS established a new category of migratory bird permit, namely, bird rehabilitation (50 CFR Parts 17, 21 and 22). Rehabilitation permits take the place of the old special use

permits for rehabilitation by specifically authorizing migratory bird rehabilitation, including rehabilitation of migratory bird species listed as threatened or endangered under the Endangered Species Act. The new permits, applicable to approximately 2500 bird rehabilitators nationwide (veterinarians are exempt), set specific requirements to take, temporarily posses, or transport any migratory bird for rehabilitation purposes. However, any person who finds a sick, injured, or orphaned migratory bird may, without a permit, take possession of the bird in order to immediately transport it to a permitted rehabilitator.

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

1630.2 MAMMALS

Marine Mammal Protection Act of 1972 (MMPA)
The Marine Mammal Protection Act (MMPA) established a federal responsibility to conserve marine mammals. Management of sea otter, walrus, polar bear, dugong, and manatee is vested with the Department of the Interior's USFWS. The Department of Commerce's NOAA is responsible for managing cetaceans (whales and dolphins) and pinnipeds (seals and sea lions), other than the walrus. Under the MMPA, it is illegal to harass, hunt, capture or kill, or attempt to harass, hunt, capture or kill any marine mammal. Some marine mammals receive additional protection under the Endangered Species Act.

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

1630.3 FISH

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

states have responsibility for all fishes within their state boundaries, except where federal law supersedes.

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

Magnuson-Stevens Fishery Conservation and Management Act of 1996
This law, more popularly known as the Sustainable Fisheries Act, amended the Fishery Conservation and Management Act of 1976. The amendments mandate the Secretary of Commerce to promulgate guidelines for identification of essential fish habitat by Fishery Management Councils. Section 305(b)(2)-(4) outlines a process for the National Marine Fisheries Service (NMFS) and Councils to comment on activities proposed by federal agencies that may adversely impact areas designated as essential fish habitat. Essential fish habitat is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, growth and maturity.

The consultation process is usually integrated into existing environmental review procedures, such as the Endangered Species Act or Fish and Wildlife Coordination Act.

The NMFS provides the federal agency with essential fish habitat recommendations that would avoid, mitigate or offset the adverse impact of a proposed activity on essential fish habitat. The recommendations are advisory in nature, but the federal agency must respond within 30 days from the date the recommendations are received. If the federal agency chooses not to adopt the NMFS recommendations, it must provide an explanation.

National Marine Sanctuaries Act of 1972
The National Marine Sanctuaries Act (NMSA) authorizes the Secretary of Commerce to designate and protect areas of the marine environment with special national significance due to their conservation, recreational, ecological, historical, scientific, cultural, archeological, educational, or esthetic qualities as national marine sanctuaries. Day-to-day management of national marine sanctuaries has been delegated by the Secretary of Commerce to NOAA's Office of National Marine Sanctuaries. The primary objective of the NMSA is to protect marine resources, such as coral reefs, sunken historical vessels or unique habitats.

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

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

1630.4 ENDANGERED SPECIES ACT (ESA)

The Endangered Species Act of 1973
This law was enacted to conserve and recover threatened and endangered species and the ecosystems upon which they depend. The Act is administered by the USFWS in the Department of the Interior and the NMFS in the Department of Commerce. Under Section 7 of the ESA, federal agencies must consult with these trustee agencies on actions they take, permit, or fund which may jeopardize listed endangered species or adversely modify their designated critical habitat. During emergencies, such as disasters, casualties, national defense or security emergencies, and response to oil spills, the ESA allows for emergency consultation during the event, with formal consultation occurring after the event, if necessary.

Implementation of the Interagency Memorandum of Agreement for the Endangered Species Act
Signed by the USCG, USEPA, NOAA, DOI, USFWS, and NMFS, aligns the consultation requirements with the pollution response responsibilities outlined in the NCP, 40 CFR 300. The MOA is intended to be used at the Area Committee level primarily to identify and incorporate plans and procedures to protect listed species and designated critical habitat during spill planning and response activities.

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

[Link to ESA MOU]

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

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

As a result, several federal departments and agencies entered into a Programmatic Agreement on the Protection of Historic Properties during emergency response under the NCP to ensure that historic properties are taken into account in their planning for and conduct of the emergency response under the NCP. Generally, during pre-incident planning, historic properties and exclusions are identified to the fullest extent possible; notification lists are generated; and emergency response strategies are developed. During a federally-led emergency response in an area that has not been excluded, the FOSC will activate the agreed-upon mechanism for addressing historic properties, including notification of the identified parties, consult with them regarding historic properties that may be affected, assess the potential effects of emergency response, and develop and implement response activities. Note that if it is clear to the FOSC that no historical property is involved, then there is no need to obtain expertise or hire a Historic Properties Specialists to make such a determination. It is recognized that historic properties is only one of the many issues that FOSCs take into account when responding to a spill. The DOI requires notification when any DOI facility that is protected under the NHPA has been or may be impacted by a discharge of oil/hazmat.

Each state has a State Historic Preservation Officer (SHPO). The SHPO can provide many important services to local governments and historic preservation commissions. The SHPO is designated by the Governor of each state. In some states, he or she serves directly in the Governor's cabinet or executive office. In other states, the SHPO may be an official in an archives department, a state historic society, or a state museum.

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

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

The National Historic Preservation Act established certain SHPO responsibilities. These include the following:

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

Under 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:

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

[Link to SHPOs]

Note: See Section 4740 for Protection of Historic Properties during Emergency Response Operations under the National Oil and Hazardous Substances Pollution Contingency Plan

SHPOs in Western Lake Superior Area of Responsibility:

State	Name	Address	Phone Number(s)
Minnesota	Mr. Stephen Elliot, SHPO	State Historic Preservation Office Minnesota Historical Society 345 Kellogg Blvd. W. St. Paul, MN 55102-1903	Phone: 651-259-3450 Fax: 651-282-2374 http://www.mnhs.org/shpo/contact.htm
Wisconsin	Mr. Jim Draeger, SHPO	State Historic Preservation Office Division of Historic Preservation and Public History 816 State Street, Room 305 Madison, WI 53706	(608) 264-6498 (608) 264-6404 (FAX) Wisconsin Historical Society
Michigan	Mr. Brian D. Conway, SHPO	Michigan State Housing Dev Auth 702 West Kalamazoo Street P.O. Box 30740 Lansing, MI 48909-8240	(517) 373-1630 (517) 335-0348 (FAX) http://www.michigan.gov/mshda/0,4641,7-141-54317_54760_61869---,00.html

1650 CLEANUP ASSESSMENT PROTOCOL (HOW CLEAN IS CLEAN)

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

1650.1 USE OF CHEMICAL AGENTS

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

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

1650.2 DISPERSANT PRE-APPROVAL/MONITORING/DECISION PROTOCOL

Use of dispersants or other oil emulsifiers is not pre-approved anywhere in the Great Lakes. The FOSC may not authorize use of a product that is not listed on the Product Schedule. In addition, the RRT Region 5 Solidifier Pre-Approval is addressed in Appendix C-41.

See Section 3260 and Appendices F & H

1650.3 IN SITU BURN APPROVAL/MONITORING/DECISION PROTOCOL

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

See Sections 1660, 3270, and Appendices F & I.

1650.4 BIOREMEDIATION APPROVAL/MONITORING/DECISION PROTOCOL

The objective of bioremediation is to accelerate the rate of hydrocarbon degradation due to natural microbial processes by biostimulation or bioaugmentation.

See Sections 1650.3, 3280, and Appendices H-1

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

• Verify need for applicable state requirements. [Link to GRPs]

• Prior to listing, products must submit efficacy test results to be listed on the Product Schedule. The evaluation criteria were established by a scientific panel under the USEPA Bioremediation Action Committee and are noted as minimal standards for acceptance.

  − The test uses Alaska North Slope crude oil with water-oil control, oil-nutrients, and oil-agent.

- Samples are taken at day 0, 7, and 28 for GC/MS analysis of alkanes and aromatics, and gravimetric change in weight after 28 days.

- The standard for listing is: The products need to perform statistically significantly better than the control.

- The conditions of the efficacy test are ideal: closed, well-mixed flasks where neither nutrients nor microbes are lost from the system, competition from indigenous microbes is minimal, and aeration is good.

- Performance in the field will most certainly differ.

See Section 3280.

1660 SPECIALIZED MONITORING OF APPLIED RESPONSE TECHNOLOGY (SMART)

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

1670 SENSITIVE SECURITY INFORMATION (SSI) RELATING TO ACPs

1670.1 BACKGROUND

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

1670.2 IMPLEMENTATION

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

1670.3 RCPs

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

1670.4 ACPs

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

1670.5 ITEMIZATION OF SENSITIVE INFORMATION

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

- Personal contact information for agency personnel to include their home addresses and phone numbers (unless this phone number is used as an agency emergency contact notification).
- Personal contact information of chemical and petro-chemical facility personnel to include their names, home addresses, and phone numbers.

- Petro-chemical and chemical facility information, to include: facility schematics showing pipe and tank locations; products and hazardous materials handled including volumes, types, and locations; transfer schedules; and/or security measures.

- Locations of radiation sources in the region (lists of facilities with licenses and what type of source).

- Maps or diagrams depicting hazardous material plume trajectories (in the event of a release), based on actual products transported, stored, or manufactured in the area. (Note: Oil spill trajectories as they relate to possible scenarios are not considered sensitive.)

- HAZMAT and WMD scenarios based on actual products transported, stored, or manufactured in the area.

- Bulk chemical and liquefied hazardous gas carrier schedules and routes.
  (Note: Many LNG/LPG vessels have moving and/or fixed Safety Zones [33CFR165] associated with them; however, their routes are not identified in the regulations and likewise should not be made available through an ACP.)

- Railroad references when detailing bulk HazMat shipments.

- Oil, chemical and natural gas pipeline diagrams.

- Locations of public and private drinking water systems including intakes, pumping stations, wells, and other key delivery components.

- Hazmat and public health resource listings including hospitals able to assist with decontamination and disposal of biologically contaminated material.

- Terrorism annexes (for all plans that have included them).

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

1700 Reserved

1800 Reserved

1900 Reserved for Area/District

2000 COMMAND

2010 PUBLIC VERSUS PRIVATE EQUIPMENT

[Link to Section 1610 PUBLIC AND PRIVATE RESOURCE UTILIZATION]

2100 UNIFIED COMMAND

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

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

The AC adopted ICS/UC as the basic model for operating a coordinated response. Under the UC structure, federal government, state, and responsible party will each provide an IC, who will consult with each other and share decision-making authority regarding spill response and clean-up management issues. Depending on the circumstances of the incident, a local or tribal entity may also provide an IC. Together, these ICs will jointly serve as UC. In doing so it brings together the expertise, resources, and equipment of many organizations so that the incident can be handled in the safest, quickest, and most efficient manner.

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

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

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

Unified Commanders must be able to:

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

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

2100.1 AREA COMMAND

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

Chapter 14 of the IMH can be used to facilitate Area Command responsibilities.

2100.2 CRITICAL SUCCESS FACTORS

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

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

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

Human Health and Safety
- No spill related public injuries, illness, or deaths
- No response worker injuries, illness, or deaths

Stakeholder Service and Support
- Minimize impact to Stakeholders
- Stakeholders well informed
- Positive meetings with Stakeholders
- Prompt handling of damage claims

2100.3 PLANNING CYCLE

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

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

The IAP is a plan containing general objectives reflecting the overall strategy for managing the incident. It may include the identification of operational resources and assignments. It may also include attachments that provide direction and important information for management of the incident. The IAP guides the next operational period's operations. The IC/UC specifies the operational period duration, typically 12 or 24 hours. Short operational periods still require completion of a full planning cycle and the generation of an IAP. As conditions warrant, and the incident progresses, the UC will likely lengthen the operational period to 48/72/96 or more hours as applicable. IAP contents can be found on

the USCG Homeport website. The Planning "P" represents the daily cycle of scheduled meetings and briefings. It is based upon an operational period that can be modified by the UC to meet the changing needs of a response. Further explanation of the planning cycle can be found in Chapter 3 of the USCG IMH.

2110 COMMAND REPRESENTATIVES

2110.1 INCIDENT COMMANDER (IC)

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

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

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

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

2110.2 FEDERAL ON-SCENE COORDINATOR (FOSC)

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

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

- USEPA pre-designated FOSCs - In accordance with the NCP the USEPA shall provide FOSCs for discharges or releases into or threatening the inland zone, and shall provide Remedial Project Managers (RPMs) for federally funded remedial actions, except in the case of state-lead federally funded response. USEPA Regional Administrators shall designate FOSCs for areas in the inland zone for which an ACP is required under CWA section (j). USEPA will also assume all remedial actions at National Priorities List (NPL) sites in the coastal zone, even where removals are initiated by the USCG.

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

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

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

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

- Notify and Coordinate with other federal, state, tribal and local agencies.
- Determine whether proper response actions have been initiated.
- Collect information:
  - Concerning the discharge or release;
  - Spill source and cause;
  - The identification of potentially responsible parties;
  - The nature, amount, location, direction, and time of discharge;
  - Pathways to human and environmental exposure;
  - Potential impact on human health, welfare, and safety, and the environment;

- Possible impact on natural resources and property;
- Priorities for protecting human health and welfare and the environment; and
- Estimated cost for the response.
- Consult with RRT members as needed for incident specific issues.

2110.3 STATE ON-SCENE COORDINATOR (SOSC)

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

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

2110.4 LOCAL ON-SCENE COORDINATOR

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

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

2110.5 TRIBAL ON-SCENE COORDINATOR

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

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

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

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

2110.6 RESPONSIBLE PARTY (RP) REPRESENTATIVE

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

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

Each responsible party for a vessel or facility, from which a hazardous substance is released, or which poses a substantial threat of a discharge, is liable for removal costs as specified in CERCLA (42 U.S.C. 9601 et seq.).

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

- The RP should conduct inquiries into the cause of the incident. This is often done with the participation or oversight of state or federal agencies. The RP should then revise prevention, preparedness, and response measures accordingly.

2120 GUIDANCE FOR SETTING RESPONSE OBJECTIVES

IC's are responsible for providing direction and guidance to the Incident Management Team (IMT). The UC must analyze the overall requirements of the incident and determine the most appropriate direction for the management team to following during the response. This is accomplished by making key decisions, setting management team priorities, developing response objectives and assigning work tasks to primary staff within the IMT. Chapter 4 of the IMH can be used by Command to help facilitate their responsibilities. The information/examples provided in Chapter 4 can be used as is or modified in response to specific risk applications. To aid the IC/UC, the IMH has pre-approved initial generic UC objectives under the categories of Safety, Oil Spill, Environmental, and Management.

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

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

2130 GENERAL RESPONSE PRIORITIES

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

Local officials are usually in command of an incident and the RP for the incident is required to cooperate with and aid the local IC or UC. In most states, the role of state agencies that respond during the early stages of an incident is to provide technical advice to local commanders as soon as possible on public safety issues. [Seldom will state or federal authorities assume command from local fire or police

commanders for short-term, on-site, public safety-related issues.] However, on some incidents, both SOSCs and FOSCs may respond due to unique issues of the incident. An FOSC command structure is shown in the USCG IMH.

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

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

2140 COMMAND POST LOCATIONS

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

[Link to GRSs]

2200 SAFETY OFFICER (SOFR)

The SOFR or SSHO (Site Safety and Health Officer) is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The SOFR will recommend measures for assuring personnel safety and assess and/or anticipate hazardous and unsafe situations. The SOFR will correct unsafe acts or conditions through the regular line of authority, although the SOFR may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The SOFR maintains awareness of active and developing situations, ensures the preparation and implementation of the Site-Specific Site Safety and Health Plan (SSHP), and includes safety messages in each IAP. Only one SOFR will be assigned for each incident. The SOFR may have assistants, as necessary, and the assistants may represent assisting agencies or jurisdictions. Safety assistants may have specific responsibilities such as operations, hazardous materials, etc.

The Site Safety and Health Supervisor(s) (SSHS) or Assistant Safety Officer(s) (ASOFR) is a mandatory position under 29 CFR 1910.120. The SSHS is the individual(s) in the field responsible for enforcing the SOFRs SSHP. The SSHS must be on-site at all times while the SOFR may be at other locations.

As determined by the scale of the operation, federal and/or state OSHA compliance officers may be on-scene. They will be consulted to determine applicability of OSHA regulations. They will also assess the safety posture and procedures of the response organization. They will also recommend/order

changes as appropriate after consultation with the SOFR. Other duties include, but may not be limited to the following:

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

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

2200.1 U.S. AND STATE OSHA REPRESENTATIVES

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

2210 SITE CHARACTERIZATION

Site Characterization information is listed in the [Hazardous Substance Annex].

2220 SITE SAFETY PLAN DEVELOPMENT

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

2300 PUBLIC INFORMATION OFFICER (PIO)

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

The PIO is responsible for developing and releasing information about the incident to the media, to incident personnel, and to other appropriate agencies and organizations. Only one primary PIO will be assigned for each incident, including incidents operation under UC and multi-jurisdiction incidents. The PIO may have assistants as necessary, and the assistants may also represent assisting agencies or

jurisdictions. Agencies have different policies and procedures relative to handling of public information. Duties include:

- Determine from the IC/UC if there are any limits on information release.
- Develop material for use in media briefings.
- Obtain IC/UC approval of media releases.
- Inform media and conduct media briefings.
- Locate a suitable location for media briefings.
- Manage the Joint Information Center (JIC) if established.
- Brief Command on PIO issues and concerns.

In accordance with the NCP, when an incident occurs, it is imperative to give the public prompt, accurate information on the nature of the incident and actions underway to mitigate the damage. FOSCs/RPMs and community relations personnel should ensure that all appropriate public and private interests are kept informed and that their concerns are considered throughout the response.

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

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

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

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

2310 PROTOCOL FOR ACCESS/TIMING OF MEDIA BRIEFINGS

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

The PIO must work through and seek permission from the UC before allowing media access to the emergency scene or ICP. The PIO should obtain permission and legal counsel before releasing photos

or video footage on private property, both for purposes of conserving legal evidence and potential violation of owners' rights.

The general public's opinion of response efforts is not always based upon what action has been taken, but upon what information they received. Supplying information to the media is a critical component of spill response and is a primary function of the FOSC. Early and accurate news releases serve to minimize public apprehension and to enhance their faith in the response community. The NRT provides Risk Communication guidance for Oil Spill Response and additional information regarding risk communications.

The following general guidelines are provided:

- Timely and accurate information should be provided to protect public health and obtain public cooperation, and to assist in guarding against further environmental damage.
- Clear communication by spill response authorities is essential for the delivery of accurate information to avert misinformation or rumors sometimes engendered by an emergency.
- The FOSC must immediately establish and maintain his/her position as chief articulator of an incident. It is the FOSCs and SOSCs role - not the role of the spiller or others--to deliver public statements regarding the effects of a spill, including evaluations of a spill's size, extent, nature, dangers to public health or resources, details of the response plan, the FOSCs expectations for response plan implementation, degree of success or lack of success of a spill response, and the anticipated long-term effects of a spill.

  • When a spill occurs, the FOSC must immediately open communications with local government officials of affected communities, conveying facts needed by residents for their own response activities and protection of public health and resources. Initial phone calls to establish communication channels with local governments and appropriate organizations, such as fishermen and native groups, should be followed by regular updates through spill bulletins, press releases, and briefings.

2310.1 DAILY PRESS BRIEFINGS

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

the pressure of interviews throughout the remainder of the day, as well as free reporters to proceed with fieldwork.

2310.2 NEWS RELEASES/PRESS RELEASES/FACT SHEETS

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

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

2310.3 SOCIAL MEDIA IN A RESPONSE

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

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

2320 JOINT INFORMATION CENTER (JIC)

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

or near the ICP where the PIO and staff can coordinate and provide information on the incident to the public, media, and other agencies.

During a major oil spill, hazardous substance response or marine disaster where media activity is expected to last several days, the UC should establish a JIC to coordinate public affairs activities of participating agencies and parties. It is established to handle the joint public information needs of all groups participating in the response.
The role of the JIC includes:

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

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

2330 RISK COMMUNICATION

Risk communication is maximizing public safety by presenting information to the public in a timely and professional manner during emergency situations. Maximum cooperation is needed from the public to ensure safe response efforts. Today, ICs have responsibility to communicate risks to the public concerned with terrorism, homeland security, environmental disasters, and other events. The UC is the trusted specialist the public is looking for to answer and address questions and concerns. Examples of situations involving risk communication include, but are not limited to the following:

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

Three equations resulting in successful Risk Communication:

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

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

Work with the Liaison Officer (LOFR) to identify stakeholders listed in the GRSs. Examples of stakeholders include, but are not limited to the following:

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

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

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

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

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

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

2340 MEDIA CONTACTS

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

2400 LIAISON OFFICER (LOFR)

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

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

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

2410 TRUSTEES

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

40 CFR 300 Trustees for Natural Resources designation and responsibilities.

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

- Secretary, Department of Agriculture;
- Secretary, Department of Commerce;
- Secretary, Department of Defense;
- Secretary, Department of Energy;
- Secretary, Department of the Interior;
- Leader(s) of state resource agencies (designated by the governor of each state);
- Leader(s) of federally-recognized Indian tribes (designated by the governing body of any Indian tribe); and
- Leaders of foreign government resource agencies (designated by the head of any foreign government)

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

2410.1 NOTIFICATION OF DOI

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

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

2410.2 NATURAL RESOURCE DAMAGE ASSESSMENT AND RESTORATION (NRDAR)

The overall goals of the NRDAR process are to restore the injured natural resources to pre-spill conditions and to obtain compensation for all documented losses of natural resources and services that occur between the spill and the return to baseline (pre-spill) conditions. In general, the NRDAR process may require several phases to complete, including individual phases of documenting injuries, assessing damages, settling claims, and undertaking restoration programs. This document addresses the NRDAR process only during initial stages while response efforts are underway. This document attempts to describe the NRDAR process, identify principle participants in NRDAR activities, and clarify the relationship of NRDAR to ICS. NRDAR is separate from the response and is not part of the ICS. However, and as mentioned in the previous section, the FLAT coordinate the NRDAR process with the LOFR in ICS in order to minimize interference, share resources and information and avoid duplication of effort. This information provided here is to allow an RP to understand the NRDAR process. Additional information is provided concerning funding for NRDAR activities and the requirements for specific federal, state, and local permits necessary to collect information for assessments of natural resource damages.

2410.3 NRDAR REPRESENTATIVES

The NRDAR Representatives are responsible for coordinating NRDAR needs and activities of the trustee team. NRDAR activities do not occur within the structure, processes, and control of ICS.

However, in the early phases of a spill response, NRDAR activities may overlap with environmental assessment activities. Since NRDAR is carried out by natural resource trust agencies and/or their contractors, personnel limitations may require staff to perform both NRDAR and response activities simultaneously. Therefore, NRDAR representatives should remain coordinated with the spill response organization through the LOFR, and may need to work directly with the IC/UC, Planning Section, Operations Section, and the NOAA SSC to resolve any problems or address areas of overlap. This includes close coordination with the LOFR for obtaining timely information on the spill and injuries to natural resources. While NRDAR resource requirements and costs may fall outside the responsibility of the Logistics and Finance/Admin Sections, coordination is important. The NRDAR Representatives will coordinate NRDAR or injury determination activities. The Federal Lead Administrative Trustee (FLAT) (see Section 2410.5) should:

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

2410.4 NOTIFICATION PROCEDURE FOR INITIATING NRDAR ACTIONS

In the event of an oil or hazardous substances spill, the FOSC shall ensure that potentially affected federal, state, tribal and foreign natural resource trustee representatives are promptly notified by telephone. Prompt notification pursuant to the NCP enables the trustees to quickly initiate a NRDAR for the purpose of restoring natural resources and lost uses to pre-spill conditions. [Link to GRSs][Link to RRT contact list]

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

2410.5 IDENTIFICATION OF FEDERAL AND INCIDENT LEAD ADMINISTRATIVE TRUSTEE

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

2410.6 NRDAR AND ICS

One objective of ICS is to reduce or eliminate duplication of efforts by numerous response agencies, while attempting to control or contain the spill and mitigate possible impacts of spilled oil. A small group consisting of the FOSC, SOSC, local IC, and a representative of the RP from the UC, and coordinates and directs the actions of the response.
Concerns of affected local governments related to spill response or cleanup are generally presented to the UC through a Multi-Agency Coordination (MAC) group representative. The local government claims for spill damages associated with services provided by natural resources should be coordinated with the Trustee NRDAR Team to avoid overlap within assessments.

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

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

Uninterrupted communication between the UC and the NRDAR Team is essential to ensure that needs and efforts of the NRDAR Team are not in conflict with response strategies and activities selected by the UC. Information concerning, for example, the spill trajectory forecasts, cleanup strategies, and beach and port closures should be made available to the NRDAR Team to assist sample and data

collection in a timely fashion. Conversely, information concerning potential injuries to natural resources caused by oiling or response techniques should be made available to the Planning Section before implementation of cleanup responses by the Operations Section.

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

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

2420 INVESTIGATORS

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

2430 AGENCY REPRESENTATIVES (AREP)

In many multi-jurisdiction incidents, an agency or jurisdiction may send an AREP who is not on direct tactical assignment, but is there to assist in coordination efforts. An AREP is an individual assigned to an incident from an assisting or cooperating agency who has been delegated authority to make decisions on matters affecting that agency's participation at the incident. AREPs report to the LOFR or to the IC/UC in the absence of the LOFR. AREPs should:

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

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

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

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

2450 STAKEHOLDERS

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

2500 INTELLIGENCE OFFICER (INTO)

The analysis and sharing of information and intelligence are important elements of ICS. The Intelligence Officer (INTO) has the responsibility to provide command intelligence information that can have a direct impact on the safety of response personnel and influence the disposition of maritime security assets involved in the response. In this context, intelligence includes not only national security or other types of classified information, but also other operational information such as risk assignments, medical intelligence, (i.e., surveillance), weather information, geospatial data, structural designs, toxic contaminant levels, and utilities and public works data that may come from a variety of different sources. Information and Intelligence must be appropriately analyzed and shared with personnel, designated by the IC/UC, who have a “need-to-know” to ensure they support decision-making.

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

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

The INTO has the following responsibility:

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

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

2510 AGENCIES THAT MAY SUPPORT THE INTELLIGENCE OFFICER

- USCG Field Intelligence Support Team (FIST)
- FBI Field Intelligence Group (FIG)
- State Police Intel
- Immigration and Customs Enforcement (ICE) (Intel Analysts)
- Customs and Border Protection (CBP Analysts)

2600 Reserved

2700 Reserved

2800 Reserved

2900 Reserved for Area/District

3000 OPERATIONS

3010 THE OPERATIONS SECTION ORGANIZATION

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

3020 INITIAL RESPONSE ACTIONS OF THE OPERATIONS SECTION CHIEF (OSC)

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

These actions include:

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

The OSCs information on the ICS-201 should include:

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

3100 OPERATIONS SECTION ORGANIZATION

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

3100.1 ORGANIZATION OPTIONS

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

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

3110 OPERATIONS SECTION CHIEF (OSC)

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

- Evaluate and request sufficient Section supervisory staffing for both operational and planning activities.
- Supervise Operation Section field personnel.
- Implement the IAP for the Operations Section.
- Evaluate on-scene operations and make adjustments to organization, strategies, tactics, and resources as necessary.
- Ensure the Operations Section personnel execute work assignments following approved safety practices.
- Assemble/disassemble task force, strike teams as appropriate.
- Identify utilize staging areas.

- Evaluate and monitor current situation for use in next operational period planning.
- Convert operational incident objectives into strategic and tactical options.
- Coordinate and consult with PSC, SOFR, technical specialists, modeling scenarios, trajectories, etc., on selection of appropriate strategies and tactics to accomplish objectives.
- Identify kind and number of resources required to support selected strategies.
- Develop work assignments and allocate tactical resources based on strategic requirements.
- Participate in the planning process and the development of the tactical portions of the IAP.
- Develop recommended Demob list and receive and implement applicable sections of the Demob plan.

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

3110.1 THE OSC RESPONSIBILITIES IN SUPPORTING THE ICS PLANNING PROCESS

Figure 1 is a visual depiction of the ICS Planning Process. The OSC is a critical participant in the planning process and must be fully engaged in order for the planning process to work efficiently.

3110.2 FORECASTED OPERATIONS INCIDENT ACTION TIMELINES

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

3200 RECOVERY AND PROTECTION BRANCH

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

- Protection Group
- On Water Recovery Group
- Shoreside Recovery Group
- Disposal Group
- Decontamination Group

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

3210 PROTECTION GROUP

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

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

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

3210.1 CONTAINMENT AND PROTECTION OPTIONS

See the GRSs for detailed containment and protection options.

3220 ON WATER RECOVERY GROUP

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

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

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

3220.1 RECOVERY OPTIONS

On water recovery options will likely include SORS, small boat skimming systems and sorbent materials. See the GRSs for a listing of oil spill recovery options within the AOR.

3220.2 TEMPORARY STORAGE

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

3230 SHORESIDE RECOVERY GROUP

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

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

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

3230.1 SHORELINE CLEANUP OPTIONS

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

3230.2 PRE-BEACH CLEANUP

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

3230.3 STORAGE REQUIREMENTS

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

smaller quantities. It is essential that the dumpster or similar storage device be lined with plastic material to prevent further contamination and leakage.

3240 DISPOSAL GROUP

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

- Direct the collection, temporary storage, transportation, recycling, and proper disposal of recovered wastes.
- Manage temporary storage sites and prevent secondary discharges or cross contamination.
- Ensure compliance with all hazardous waste laws and regulations, specifically Resource Conservation and Recovery Act (RCRA) requirements.
- Confirm laboratory waste characterization results and prepare RCRA manifests as required. Note: Ensure a HAZARDOUS WASTE MANIFEST is generated for disposals involving 5 gallons or more of petroleum products as dictated USEPA (RCRA Hot Line 1-800-424-9346). Disposals of less than 5 gallons or 50 lbs. must comply with RCRA but may not require a manifest.
- Maintain accurate records of recovered material.
- The FOSC will ensure that all wastes generated will be adequately characterized and appropriate disposal will be arranged, regardless of whether it is a federal or RP lead incident.
- Determine temporary and ultimate disposal sites as appropriate.

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

3240.1 WASTE MANAGEMENT AND TEMPORARY STORAGE OPTIONS

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

Any discussion of the disposal of oil or hazardous material recovered during clean-up of a discharge or release in the Great Lakes Zone must first recognize the location of the removal site will play a major role in the disposal method decision-making process. In addition, each of the eight states within the

zone has its own state laws and regulations. Therefore, each incident will be unique and only generalities can be made concerning some aspects of disposal. In the interest of conservation, individual state laws will not be repeated in this plan.

3240.2 DECANTING POLICY

Large quantities of oily-water/fluids are typically generated during an oil spill response, as a result of skimming and vacuuming operations. These collected fluids consist mostly of water with suspended hydrocarbons which eventually float to the surface. Recovered oil and water mixtures will typically separate into distinct phases when left in a quiescent state. When separation occurs, the relatively clean water phase can be siphoned or decanted back into the containment or recovery point with minimal impact. Decanting therefore increases the effective on-site storage capacity and equipment operating time. Oil recovery operations can continue as long as there is a place to store the recovered fluids. Once field storage capacity is reached, skimming/vacuuming operations must terminate until additional storage is provided. Because this process risks discharge of oil already recovered, it must be done carefully. Typically decanting water is discharged into a secondary storage container or into a boomed area where any accidental discharged oil can be contained and recovered. Approval to decant during a response, although unlikely, must be requested and approved through the IC/UC, with concurrence from the respective RRT. The decision making process for incident specific RRTs, is outlined in each RCP.

Note: During the 2009 Twin Ports Area Spill Management Team (ASMT) Tabletop Exercise (Minnesota, Wisconsin), and the 2011 UP ASMT TTX (Michigan) decanting policy was exercised. At that time representatives from each State, stated they would not likely approve decanting directly back into secondary containment. This has been captured as lessons learned in the TTX AAR. The States stated decanting on scene will likely only be approved into portable water treatment systems. EPA Reg V stated they have a portable water treatment system which can be requested but is typically in use. OSROs stated they have access to such systems.

3250 DECONTAMINATION GROUP

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

- Implement the Decontamination Plan.
- Determine resource needs.
- Direct and coordinate decontamination activities.
- Brief site SOFR on conditions.
- Establish the Contamination Reduction Corridor(s).
- Identify contaminated people and equipment.
- Supervise the operations of the decontamination element in the process of decontaminated people and equipment.

- Maintain control of movement of people and equipment within the Contamination Reduction Zone.
- Maintain communications and coordinate operations with the Entry Leader.
- Maintain communications and coordinate operations with the Site Access Control Leader.
- Coordinate the transfer of contaminated patients requiring medical attention (after Decon) to the Medical Group.
- Coordinate the handling, storage and transfer of contaminants within the contamination reduction zone.

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

3250.1 SAMPLE DECON PLAN

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

3260 SMART PROTOCOL

See Section 1660 of this plan.

3270 IN-SITU BURNING (ISB)

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

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

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

3270.1 IN-SITU BURN OPTIONS

See Sections 1650.3 and 1660. [Link to RCPs]

3270.2 IN-SITU BURN CHECKLIST

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

3270.3 ISB PREAUTHORIZATION ZONES

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

3270.4 TYPES OF ISB EQUIPMENT REQUIRED

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

3280 BIOREMEDIATION

See Section 1650.4. [Link to RCPs]

3280.1 BIOREMEDIATION CHECKLIST

See Appendix V of the RRT5 RCP: Chemical Use Checklist in Region 5.

[Link to RCPs]

3280.2 BIOREMEDIATION PREAUTHORIZATION ZONES

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

3280.3 TYPES OF BIOREMEDIATION RESOURCES REQUIRED

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

3300 EMERGENCY RESPONSE BRANCH

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

- Salvage Group (SMFF)
- Fire Suppression Group (SMFF)
- Hazardous Materials Group
- Additional information regarding this position under ICS can be found in the USCG IMH.

[Link to SMFF Annex]

3310 HAZARDOUS MATERIALS GROUP

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

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

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

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

3320 INITIAL EMERGENCY RESPONSE PROCEDURES

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

3330 EVACUATION PROCEDURES

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

3400 AIR OPERATIONS BRANCH

3410 AIR OPERATIONS BRANCH DIRECTOR (AOBD)

The Air Operations Branch Director (AOBD) is responsible for all aspects of incident aircraft from supporting tactical operations to logistical support of the aircraft. The primary responsibilities of the AOBD are outlined in the USCG IMH.

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

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

3420 AIR TACTICAL

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

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

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

3420.1 AERIAL SURVEILLANCE

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

3420.2 PROCEDURES FOR TEMPORARY FLIGHT RESTRICTIONS

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

3430 AIR SUPPORT

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

- Participate in AOBD planning activities.
- Inform AOBD of group activities.
- Identify resources/supplies dispatched for the Air Tactical Group.
- Request special air support items from appropriate sources through Logistics Section.
- Determine the need for assignment of personnel and equipment at each airbase.
- Coordinate activities with the AOBD.
- Obtain assigned ground-to-air frequency for airbase operations from COML or Incident Radio Coms Plan (ICS 205-CG).
- Inform AOBD of capability to perform night flying service.
- Ensure compliance with each agency's operations checklist for day and night operations.
- Ensure dust abatement procedures are implemented at Helibases and Helispots.
- Provide crash-rescue service for Helibases and Helispots.
- Debrief as directed at the end of each shift.

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

3430.1 AIRPORTS AND HELIBASES

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

3500 STAGING AREAS (STAM)

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

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

3510 SECURITY

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

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

3600 WILDLIFE BRANCH

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

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

3610 FISH AND WILDLIFE PROTECTION OPTIONS

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

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

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

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

3620 RECOVERY

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

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

3620.1 WILDLIFE RECOVERY OPERATIONS AND PROCEDURES

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

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

3620.2 RECOVERY PROCESSING

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

The USFWS's Division of Law Enforcement (DLE) is responsible for investigating suspected and alleged violations of federal wildlife laws including the Migratory Bird Treaty Act, 16 USC 703 *et seq.*, the ESA, 16 USC 1538 *et seq.*, the Eagle Protection Act, 16 USC 668a *et seq.*, the National Wildlife Refuge Act, 16 USC 668dd *et seq.*, and several others. Wildlife injuries, mortalities and habitat impacts resulting from spills can constitute violations of DLE - enforced laws. Agents of DLE may be required to initiate investigations during the spill response phase in order to document violations and collect evidence in a timely manner. It should be emphasized that maintaining chain of custody is paramount when handling wildlife which may be considered evidence for potential litigation. DLE agents will need

to establish chain of custody from the onset of any capture or recovery. These officers will normally coordinate their activities with the FOSC or other on scene law enforcement personnel. Additionally the USFWS agents can insure that responders possess the necessary federal permits and that wildlife-related response activities are accomplished in accordance with applicable law and permit provisions.

Processing procedures will be specified as incident specific criteria dictates.

3620.3 CARCASS RETRIEVAL AND PROCESSING

When collecting carcasses during capture activities, capture teams should receive guidance from natural resource management agencies as to which carcasses to collect and how to record the location and condition of the carcass prior to collection. Oiled carcasses should be collected in accordance with spill-incident specific instructions and chain of custody protocols as provided by the natural resource management agencies. Each carcass should be photographed then placed in an individual bag or wrapped in aluminum foil; labeled with date, time, location, and collector's name; and taken to a designated morgue location.

3630 WILDLIFE REHABILITATION

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

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

3630.1 WILDLIFE REHABILITATION OPERATIONS

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

- Protection: Hazing devices and removal of dead impacted wildlife may be helpful in keeping other wildlife from impacted areas. Baiting clean areas is another method of protecting unoiled wildlife.
- Collection: Only trained collectors should be allowed to participate, due to safety considerations such as (1) the potential for contact with pollutants; (2) physical hazards involved in the handling

of wildlife; and (3) the potential for additional stress placed on the wildlife involved. Federal and state permits are required for collection of most wildlife.

- Rehabilitation: This medical procedure should be done by trained and permitted supervision. In addition to trained and permitted rehabilitators, considerable additional resources – including trained volunteers, supplies, and facilities – are critical to a timely and effective rehabilitation effort.

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

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

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

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

3630.2 REHABILITATION FACILITIES

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

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

Wildlife rehabilitation organizations and facilities contact information:

Organization	Location	Phone No. #
Tri-State Bird Rescue	110 Posssum Hollow Rd. Newark, DE 19711	(302) 737-9543 (800) 710-0696 (24 Hrs)
Wildlife Rehabilitation Center of Minnesota	2530 Dale Street North Roseville, MN 55113 Phil Jenni, Executive Director	(651) 486-9453
National Audubon Society	1442 Brenner Ave Roseville, MN 55113	(651) 291-2596
International Bird Research Center (IBRRC)	Northern California Bird Center	(707) 207-0380
Alaska Wildlife Response Center	6132 Nielson Way Anchorage, AK 99518	(907) 562-1326 (907) 230-2492
Michigan Technological University Forestry & Environmental Science	Houghton, MI	(906) 487-1885
Wildwoods Rehab	Duluth, MN	(218) 491-3604
Great Lakes Aquarium (Animal Care)	Duluth, MN	(218) 740-3474 ext 1049 or hnelson@glaquarium.org

Primary Trustees:

Department of Agriculture –APHIS Wildlife Services	Mr. Paul Wolf Mr. Jason Suckow	(651) 224-6027 (608) 837-2727 x 18
Department of Interior U.S. Fish & Wildlife Service	Mr. Lindy Nelson Mr. Dave Warburton Ms. Annette Trowbridge	(215 597-5012 (952) 252-0092 x 203 (612) 713-5104
Minnesota Department of Natural Resources	Ms. Marilyn Danks	(651) 259-5087
Wisconsin Department of Natural Resources	Mr. John Sager Ms. Tami Ryan	(715) 392-7822 (608) 266-3143
Michigan Department of Natural Resources & Attorney General	Mr. Steve Casey	(906) 228-6568 (906) 236-1362

Tribal Trustees: **(Note: See Section 1200 for a map of the Tribal Ceded Territories)**

Tribal Trustees	Point of Contact	Phone Number(s)
(1854 Treaty Rights) Bois Forte RTC 5344 Lakeshore Drive Nett Lake, MN 55772	Mr. Kevin Leecy, Tribal Chair Mr. Kevin Koski Emergency Management Director	 (218) 757-3261 x 194 (218) 757-3261 (DNR)
(1854 Treaty Rights) Grand Portage Band of Chippewa P.O. Box 428, 83 Stevens Rd Grand Portage, MN 55605	Mr. Norman Deschampe, Chairman Mr. Seth Moore, Environmental Director Mr. Mike Keyport, Emergency Mgmt	 (218) 475-2277 (218) 475-2022
(1854 Treaty Rights) Fond du Lac Band of Chippewa 1720 Big Lake Road Cloquet, MN 55720	Ms. Karen Diver, Chairman Mr. Wayne Dupuis, Environmental Program Manager	 (218) 879-4593 (218) 878-7106
(1842 Treaty Rights) Bad River Band of Chippewa P.O. Box 39, Hwy 2 Odanah, WI 54861	Mr. Robert Blanchard, Chairman Mr. Ervin Soulier, Natural Resources Director Mr. Tony Corbine, ANA Project Mgr Ms. Lissa Radke, Environmental Specialist	 (715) 682-7123 (715) 682-7123 x1560 (715) 682-7123 x1551
(1842 Treaty Rights) Red Cliff Band of Chippewa 88385 Pike Road, Hwy. 13 Bayfield, WI 54814	Mr. Bryan Bainbridge, Chairman Ms. Melonee Montano, Environmental Director Ms. Linda Nguyen, Water Resource Mgr	 (715) 779-3700 (715) 779-3650
(1842 Treaty Rights) Keweenaw Bay Band of Chippewa 107 Beartown Road Baraga, MI 49908	Mr. Warren C. Swartz., President Ms. Katie Kruse, Environmental Response Program Specialist	(906) 353-6623 (906) 524-5757 ext 20
1854 Treaty Authority 4428 Haines Road Duluth, MN 55811	Mr. Sonny Myers Executive Director Mr. Darren Vogt Environmental Biologist	 (218) 722-8907
Great Lakes Indian Fish and Wildlife Commission (GLIFWC) P.O. Box 9; 72682 Maple Street Odanah, WI 54861	Mr. James E. Zorn Executive Administrator	(715) 682-6619 x2101

3630.3 FACILITY REQUIREMENTS AND EQUIPMENT NEEDS

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

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

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

Facility Needs and Set-up:

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

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

It is recommended that a list be assembled of potential real estate within the identified high risk areas, and the sites be physically reviewed by a representative of the wildlife response group with major spill response experience. Once the actual facilities have been identified, all costs, availability, and contract information should be reviewed with the GRS.

See Chapter 6 of the USFWS - Best Practices for Migratory Bird Care during Oil Spill Response, for more specific information on facility requirements and the respective GRSs for additional wildlife rehab organizational information.

3630.4 REHABILITATION PROCEDURES

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

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

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

3700 Reserved

3800 Reserved

3900 Reserved for Area/District

4000 PLANNING

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

4010 OPERATIONAL PERIOD

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

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

4020 PLANNING SECTION ORGANIZATION

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

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

4100 PLANNING SECTION CHIEF

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

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

The PSC is responsible for:

- Providing current, accurate situation display and concise briefings in support of meeting schedule and UC expectations

- Accurately tracking all resources through the use of T-cards or other resource tracking system and aggressive, pro-active field observers. Establishing and maintaining site control use of check in locations/recorders.
- Facilitating the Planning Process by conducting timely meetings in accordance with the meeting schedule and working closely with OSC, LSC, and Command Staff.
    - Determine the meeting schedule based on the operational period
    - Additional information regarding meeting, briefings, agendas, and schedules can be found in the USCG IMH.
- Ensuring thorough documentation of all key decisions and incident related documents.
- Establishing and maintaining an 'open action' list of issues that must be accomplished. Ensuring that each issue on the list is assigned to the appropriate ICS command element (i.e. Operations Section) for completion.
- Ensuring a complete and thorough IAP is delivered in support of operations.
- Utilizing technical specialists in coordination with Operations to provide critical information r specialized operations and planning efforts to support incident operations. Example of technical support includes: salvage plans, environmental impact statements, hazmat modeling, oil spill trajectories, and intelligence efforts etc.
- If an ICS-AC is established, ensure close coordination. Consult the guidance outlined in the ICS AC Job Aid.

Actions to take upon arriving at the incident command post:

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

4200 SITUATION UNIT LEADER (SITL) CONSIDERATIONS

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

4210 SITL RESPONSIBILITIES

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

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

4220 USE OF FIELD OBSERVERS (FOBS)

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

For example:

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

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

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

4230 ESTABLISH SITUATIONAL DISPLAYS

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

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

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

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

4240 MEETINGS AND BRIEFINGS

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

4300 RESOURCES

4310 ESTABLISHING A RESOURCE STATUS DISPLAY

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

- Check-in of arriving resources using the ICS-211, Check-In Form
- Field verification of resources that arrived on-scene before check-in was established

- Communicate resources check-in information back to the Incident Command Post where Status Recorders transfer it to the appropriate colored T- card and placed in a Resource Status Display that shows its location on the incident

The OSC is responsible for:

- Determining how an incident is divided into manageable units. For example: Division A, Search Group.
- The RESL uses that exact naming to identify location of operational resources

The RESL is responsible for:

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

4320 ROLE OF THE RESOURCES UNIT IN SUPPORTING THE OSC

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

4330 RESOURCE UNIT ROLE IN THE ICS PLANNING CYCLE

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

4340 VOLUNTEERS

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

As noted in the NCP, volunteers generally should not be used for physical removal of oil contaminated materials. Typically, volunteers should be used for minimal risk activities. In certain circumstances volunteers may be used for higher risk activities such as certain oiled wildlife cleaning activities if they have received appropriate training and Personal Protective Equipment (PPE), as contemplated by the

NCP volunteer requirements. Each GRP contains volunteer information for the respective geographic area.
[Link to GRPs]

4340.1 NRT USE OF VOLUNTEERS GUIDELINES FOR OIL SPILLS

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

4340.2 VOLUNTEER MANAGEMENT AND DOCUMENTATION

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

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

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

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

(AVOs), and analyze their capabilities and resources regarding volunteer management and services. When possible, agreements with AVOs will be made.

4340.3 AVO RESOURCES AND CAPABILITIES

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

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

Serve Minnesota
431 South 7th Street #2540
Minneapolis, MN 55415
POC: Ms. Audrey Suker, Executive Director, audrey@serveminnesota.org
612/333-7740
612/333-7758 (fax) Website: http://www.serveminnesota.org

Wisconsin National and Community Service Board
1 West Wilson Street - Room 456
Madison, WI 53703
POC: Mr. Thomas H. Devine, Executive Director, devinth@dhfs.state.wi.us
608-261-6716 or 800-620-8307
608-266-9313 (fax) Website: http://www.servewisconsin.wi.gov/

Michigan Community Service Commission
1048 Pierpont, Suite #4
Lansing, MI 48913
Ms. Paula Kaiser VanDam, Executive Directorkaiserp@michigan.gov ,

517-373-1376
517-373-4977 (fax)

FEMA's Community Emergency Response Team (CERT)

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

4400 DOCUMENTATION UNIT LEADER (DOCL)

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

Before beginning your duties a DOCL determine:

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

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

4500 DEMOBILIZATION UNIT

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

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

4510 DISTRIBUTION OF THE DEMOBILIZATION PLAN

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

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

4520 STEPS IN THE DEMOBILIZATION PROCESS

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

4600 ENVIRONMENTAL UNIT

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

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

The major responsibilities of the ENVL are:

- Identify sensitive areas and recommend response priorities.
- Following consultation with natural resource trustees, provide input on wildlife protection strategies (e.g., removing oiled carcasses, preemptive capture, hazing, and/or capture and treatment).
- Determine the extent, fate and effects of contamination.
- Acquire, distribute, and provide analysis of weather forecasts.
- Monitor the environmental consequences of response actions.
- Develop shoreline cleanup and assessment plans.

- Identify the need for, and prepare any special advisories or orders.
- Identify the need for, and obtain permits, consultations, and other authorizations, including Endangered Species Act (ESA) provisions.
- Following consultation with the FOSCs Historical/Cultural Resources Technical Specialist identifies and develops plans for protection of affected historical/cultural resources.
- Evaluate the opportunities to use various response technologies.
- Develop disposal plans.
- Develop a plan for collecting, transporting, and analyzing samples.

4610 SCIENTIFIC SUPPORT COORDINATOR (SSC)

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

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

- Serving as ENVL.
- Providing scientific support for operational decisions, such as tradeoffs for use of alternative measures.
- Coordinating on-scene scientific activity, such as field sampling and integrating ongoing academic environmental studies into response needs.
- Integrating expertise form governmental agencies, universities, community representatives, and industry to assist the FOSC in evaluating the hazards and potential effects of releases and in developing response strategies.
- Facilitating the FOSCs communication with the FLAT for natural resources to ensure coordination between damage assessment data collection efforts and data collected in support of response operations.
- Coordinating required emergency consultations for protected resources (such as threatened and endangered species, cultural resources, sensitive habitats, etc.).

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

- Oil slick trajectory forecasting and monitoring
- Pollutant transport modeling
- Environmental chemistry
- Chemical hazard assessment
- Health and safety

- Information management
- Resources at risk
- Biological assessments
- Environmental tradeoffs of cleanup strategies
- Natural Resource Trustee issues

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

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

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

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

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

4700 TECHNICAL SPECIALISTS (THSP)

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

- Provide technical expertise and advice to Command and General Staff as needed.
- Attend meetings and briefings as appropriate to clarify and help resolve technical issues within area of expertise.
- Provide technical expertise during the development of the IAP and other support plans.

- Work with the SOFR to mitigate unsafe practices.
- Work closely with LOFR to help facilitate understanding among stakeholders and special interest groups.
- Be available to attend press briefings to clarify technical issues.
- Research technical issues and provide finding to decision makers.
- Trouble shoot technical problems and provide advice on resolution.
- Review specialized plans and clarify meaning.
- In addition, the THSP is responsible for the following sub-units if established:

A Legal Specialist will act in an advisory capacity during the response. A Human Resources Specialist is responsible for providing direct human resources services to the response organization, including ensuring compliance with all labor-related laws and regulations.

Additional information regarding this position can be found in Chapter 8 and Chapter 20 of the USCG IMH.

4710 ENDANGERED SPECIES PROTECTION DURING OIL DISCHARGE EMERGENCY RESPONSE OPERATIONS

The Interagency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities under the FWPCA's NCP and the ESA MOA, which was signed by the USCG, among others, aligns the consultation requirements with the pollution response responsibilities outlined in the NCP. This section is intended to assist FOSCs and IC/UC in areas where the pre-spill planning called for in the MOA has not yet been completed. It should not be used to replace existing ACP provisions developed pursuant to the MOA or existing regional guidance on implementation of the MOA. It should also not be used as a substitute for completing pre-spill planning called for in the MOA.

4710.1 THE ENDANGERED SPECIES ACT OF 1973 (ESA)

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

4710.2 HOW THE MOA APPLIES TO THE FOSC

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

4710.3 REFERENCES

Regulations regarding ESA consultation are found in 50 CFR 402.

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

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

The Endangered Species Consultation Handbook, USFWS and NMFS

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

4720 CULTURAL AND HISTORIC PROPERTIES

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

The *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* (PA), which was signed by the USCG, among others, requires consideration of historic properties in planning for and conducting emergency response under the NCP. The PA was developed to help federal agencies sufficiently comply with requirements of the statute. This document is intended to assist FOSCs and IC/UC in areas where pre-spill planning called for in the PA has not yet been completed. However, it should not be used to replace existing regional PAs developed pursuant to the national PA or existing ACP provisions developed pursuant to a regional or the national PA. It should also not be used as a substitute for

completing pre-spill planning called for in the PA.

4720.2 THE NATIONAL HISTORIC PRESERVATION ACT

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

4720.3 HOW THE PA APPLIES TO THE FOSC

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

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

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

4720.4 OBTAINING EXPERTISE ON HISTORIC PROPERTY MATTERS DURING EMERGENCY RESPONSE

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

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

The PA specifies the professional qualifications and standards of a Historic Properties Specialist. It should be noted that only the FOSC and not the RP, may contract with experts to serve as the FOSCs Historic Properties Specialist. An FOSC may only utilize a Pollution Removal Funding Authorization (PRFA) for funding the activation of a Historic Property Specialist during emergency responses to oil pollution incidents. OSLTF resources are not available for hiring of a specialist to assist with pre-spill planning activities.

If FOSCs choose to obtain historic properties expertise through executing contracts with appropriate archaeologists, it is possible to go through a solicitation process that includes technical input and assistance from appropriate SHPOs and federal land management agency cultural resources specialists. Blanket Purchase Agreements may then be established with one or more companies or with one or more named individuals who may be activated during emergency response to serve as the FOSCs Historic Properties Specialist(s). [Link to GRPs]

4720.5 REFERENCES

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

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

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

Tribal information may be found at:

http://www.nathpo.org/,
http://www.hanksville.org/sand/contacts/tribal/,
http://www.kstrom.net/isk/maps/US.html, and
http://www.kstrom.net/isk/mainmenu.html.

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

4730.1 INTRODUCTION

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

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

Oils with a specific gravity of > 1.0, referred to as Group V oils, include some heavy fuel oils, asphalt products, and very heavy crude oils. Oils with a specific gravity greater than 1.0 may be neutrally buoyant or sink when spilled on water.

Oils that sink to the bottom or remain suspended in the water column pose risks to certain resources that are not normally affected by floating oils. These resources include fish, shellfish, sea grasses, and other benthic (seabed) and water column biota. Submerged oil may also cause episodic re-oiling of shorelines. Federal rules governing oil spill contingency plans categorize petroleum cargoes according to their physical properties. Vessels and terminals that handle Group V oils are required to include responses to spills of Group V oils in their facility response plans. The National Academy of Sciences has produced a report on the history, behavior and response of Non-Floating Oils titled, *Spills of Non-Floating Oils-Risk and Response*. Information from that report is summarized below and can be reviewed to consider recommendations and conclusions for response to spills of non-floating oils. The report is available at: http://www.nap.edu/openbook.php?isbn=0309065909.

4730.2 GROUP V OIL SPILL STATISTICS

From 1991-1996, 17% of the petroleum products transported on United States waters were heavy oils. Barges accounted for 44% of heavy oils transported and tank vessels accounted for 56%. Of all oil spills during this time frame, 23% were spills of heavy oils. Of this 23%, 20% exhibited non-floating oil behavior of sinking or becoming suspended in the water column. Barges were responsible for 80% of the volume of heavy-oil spills, 10 times higher than tank vessels. Most notable was the spill and

response to the T/B MORRIS J. BERMAN spill, San Juan Puerto Rico on January 7th, 1994. All FOSCs should maintain a copy of the report titled "The Response to the T/B MORRIS J. BERMAN Major Oil Spill", dated 25 August 1995 and a copy of the report titled, "Tank Barge MORRIS J. BERMAN Spill Submerged Oil Recovery Operations", dated 26 July 1994. These two reports identify the cleanup recovery operations of 800,000 gallons of low API #6 oil which was discharged as a result of the grounding of the T/B MORRIS J. BERMAN.

4730.3 BEHAVIOR OF HEAVY OIL

Non-floating oils behave differently and have different environmental effects than oils which float. The water column and benthic resources are at greatest risk during spills of heavy oil due to the non-floating behavior once in the water. Non-floating oils also tend to weather at a much slower rate, resulting in extended impact to resources both over time and distance.
Although floating oil modeling and predictions are well developed, models and predictions of heavy-oil behavior are unverifiable and rarely used. There is a lack of supporting field data due to the complex nature of three dimensional currents when oil sinks into the water column. Field data can be verified, but methods are very slow and labor intensive that make updating spill models difficult. Remote sensing equipment is very limited in its use because it cannot penetrate the water column.

4730.4 CONTAINMENT, RECOVERY AND RESPONSE

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

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

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

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

- Set up a Submerged Oil Task Force made up of USCG, Spill Management Team, and Spill Cleanup Contractor personnel. Task Force personnel remained a separate element within the Operations Section;

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

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

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

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

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

4800 REQUIRED CORRESPONDENCE, PERMITS & CONSULTATION

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

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

4810 FEDERAL/STATE PERMIT REQUIREMENTS (WILDLIFE)

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

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

4820 FEDERAL/STATE PERMIT REQUIREMENTS (DISPOSAL)

See Section 3240. [Link to GRPs]

4830 FEDERAL/STATE PERMIT REQUIREMENTS (DREDGING)

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

4840 FEDERAL/STATE PERMIT REQUIREMENTS (DECANTING)

See Section 3240.2.

4900 MARINE TRANSPORTATION SYSTEM RECOVERY UNIT (MTSRU)

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

The Marine Transportation Recovery Unit Leader (MTSL) is responsible for planning infrastructure recovery for Transportation Security Incidents (TSI) and other incidents that significantly impact the MTS. The MTSL will track and report on the status of the MTS, understand critical recovery pathways, recommend courses of action, and provide all MTS stakeholders with an avenue of input to the response organization. The MTSL prepares transportation data for the SITL and daily situation briefs applying core Essential Elements of Information (EEIs). The major responsibilities of MTSL are:

- Support the Operation Section Staff elements established for MTS recovery.
- Identify, track, and report impacts to the MTS IAW EEIs.
- Coordinate and consult with MTS stakeholders. Solicit periodic and standardized feedback from impacted industries/stakeholders.
- Identify resources, agencies involved, and courses of action for recovery of public infrastructure such as ATON, communications systems, and federal channels.
- Prioritize recovery operations (including ATON, dredging, salvage, cleanup, repair, etc) as appropriate.
- Monitor economic consequences of recovery actions.
- Develop traffic management plans. Identify the need for and prepare any special advisories or orders (i.e. safety/security zone).

- Assess the need for MTS relief measures outside the impacted area. Implement measures (i.e. redirect cargos, establish alternate transportation modes) as necessary.
- Liaise with MTS Response Branch Director to execute operational objectives.

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

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

5000 LOGISTICS

5010 LOGISTICS SECTION ORGANIZATION

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

5100 LOGISTICS SECTION CHIEF (LSC)

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

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

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

5110 LOGISTICS SECTION PLANNING CYCLE GUIDE

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

5200 SUPPORT BRANCH

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

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

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

5210 SUPPLY UNIT

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

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

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

5210.1 OIL AND HAZARDOUS SUBSTANCES RESPONSE EQUIPMENT

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

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

Commercial Spill Contractors (alphabetical order)

Contractor	Address	Phone	BOA Contract No. #
Bay West, Inc.	1106 88th Ave West Duluth, MN 55808 POC: Kim Bumgardner (Duluth) Mr. Craig Rebischke (St Paul)	(218) 499-3117 (651) 291-0456 (800) 279-0456	**Non-BOA Contractor**
Clean Harbors Environmental (Cannon Falls, MN)	42 Longwater Dr. 30 Joseph St. Kingston, MA 02364	(507) 263-0200	HSCG84-14-A-B00012
Environmental Troubleshooters, Inc	3825 Grand Ave Duluth, MN 55807 POC: Mr. Craig Wilson Mr. John McCarthy	(218) 722-6013 (800) 470-3536	**Non-BOA Contractor**
HydroChem (Detroit, MI)	2195 Drydock Avenue Cleveland, OH 44113 POC: Mr. Laurie Graves	(216) 861-3949 (800) 869-3649	HSCG84-14-A-G00020
M.L. Chartier, Inc.	9195 Marine City Highway Fair Haven, MI 48023-0069 POC: Mr. Craig Wilson	(888) 334-8373 (586) 725-8373	**Non-BOA Contractor**
Mackinac Environmental Tech, Inc	300 Ferry Lane P.O. Box 485 St. Ignace, MI 49781 POC: Edward Radecki	(231) 622-3229	HSCG84-13-A-G00030
Marine Pollution Control, Inc.	8631 W. Jefferson Detroit, MI 48209 POC: Mr. Kevin Hall (Ops) Mr. Bill Hazel (OSRO)	(313) 849-2333 (313) 849-2682	HSCG84-15-A-G00022
National Response Corporation (NRC)	International Operations Center 3500 Sunrise Hwy, Suite 103 Great River, NY 11739 POC: Mr. Ryan Christensen	(800) 899-4672 (Ops Center) (314) 296-2708	DTCG84-99-A-100039 MOD 0003
OSI Environmental, Inc. http://www.osienv.com/	300 Fayal Street Eveleth, MN 55734 POC: Mr. Pat Tracey	(218) 744-3064 (800) 777-8542	HSCG84-15-A-G00026
U P Environmental Services Inc.	1315 Highway US2 & 41 Bark River, MI 49807 POC: Mr. Wayne Stenberg	(906) 466-9900	HSCG84-13-A-G00009
Veolia Environmental Services	N104 W13275 Donges Bay Road Germantown, WI 53022 POC: Mr. Chad Kramer	(262) 236-8130 (800) 688-4005	**Non-BOA Contractor**
West Central Environmental Consultants, Inc	1241 72nd Ave., NE, Fridley, MN 55432 POC: Mr. Cory Teff Mr. Jon Pollock	(763) 571-4944	**Non-BOA Contractor**

Other Pollution Response Resources

Twin Ports Petroleum Mutual Aid Group – Response Trailer	Members Calumet Superior Refinery Calumet Superior Marine Terminal Enbridge Pipeline Magellan Pipeline Conoco	For emergency request call Superior Fire Department: Chief Steve Panger (715) 394-0227 (715) 394-0231 (after hrs) for information contact: Mr. John O'Brien, Calumet at:(715) 398-8204
MPCA - limited quantities of containment boom throughout Minnesota coastal counties.	(218) 302-6641 MPCA Duluth (Two Harbors, Silver Bay, Grand Marais, Grand P)	Contact: Mr. Kevin Mustonen
WAKOTA CAER (mutual aid request) 1500 ft of River boom	(651) 458-0645 Cottage Grove, MN	Request through MN State Duty Officer; (651) 649 5451; 800 422 0798
Eastern Canada Response Corporation Ltd. (ECRC) (Within Canada is a large oil spill contractor similar to the United States MSRC)	Eastern Canada Response Corp Great Lakes Region P.O. Box 788, 481 Polymoore Dr. Corunna, Ontario, Canada (519) 862-2281;Cell: (519) 464-2109 Fax: (519) 862-3510;	Mr. Stephane Johnson Operations Supervisor
Lake Superior NERR Data Sondes (water current info)	14 Marine Dr. Superior, WI (715) 392-3141	Ms. Becky Sapper see page 5000-14

5220 FACILITIES UNIT

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

- Participate in Logistics Section/Support Branch planning activities.
- In conjunction with the Finance/Admin Section, determine locations suitable for incident support facilities and secure permission to use through appropriate means.
- Inspect Facilities prior to occupation and document conditions and pre-existing damage.
- Determine requirements for each facility including the ICP.
- Prepare layouts of incident facilities.
- Notify Unit Leaders of facility layouts.
- Activate incident facilities.
- Provide Facility Managers and personnel to operate facilities.
- Provide sleeping facilities; security services and food and water services.
- Provide sanitation and shower service as needed.
- Provide facility maintenance services e.g. sanitation, lighting, clean up, trash removal, etc.
- Inspect all facilities for damage and potential claims.
- Demobilize incident facilities.

- Maintain facility records.

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

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

Minnesota
Wisconsin
Michigan

County	Director/Coordinator	Phone No.#
Cook County EMA	Mr. Jim Wiinanen	(218) 387-3059
Lake County EMA	Ms. BJ Kohlstedt	(218) 834-8480; (218) 226-4444
St. Louis County EMA	Deputy Sheriff Scott Camps Mr. Daune "Dewey" Johnson	(218) 625-3960 (218) 726-2936
Carlton County EMA	Deputy Chief Brian Belich	(218) 384-3236
Douglas County EMA	Mr. Keith Kesler Mr. Dave Sletten	(715) 395-1391 (715) 395-1497
Bayfield County EMA	Ms. Jan Victorson	(715) 373-6113
Ashland County EMA	Ms. Dorothy Tank	(715) 685-7647
Iron County EMA	Mr. Stacy Ofstad	(715) 561-3266
Ontonagon County EMA	Mr. Michael Kocher	(906) 390-0309
Gogebic County EMA	Mr. Jim Loeper	(906) 667-1118
Houghton County EMA	Mr. Chris Van Arsdale	(906) 482-6400
Keweenaw County EMA	Mr. Chris Van Arsdale	(906) 482-6400
Baraga County EMA	Mr. Jeff Hubbard	(906) 524-7240
Marquette County ESD	Ms. Teresa Schwalbach	(906) 475-1134

Airports/Heliports

Name	Type	Address	Phone Number	Longest Runway	Surface	Fuel Available
Duluth International	International	4701 Airport Drive Duluth, MN 55811	(218) 727-2968	10,152 feet	Concrete	Jet A 100 Low lead
Cook County Airport	Municipal	123 Airport Road Grand Marais, MN 55604	(218) 387-3024	4200 feet	Blacktop	Jet A
International Falls International	International	3214 2nd Ave. East International Falls, MN 56649	(218) 283-4461	6500 feet	Blacktop	Jet A 100 Low Lead
North County Aviation	Aircraft Charter	Hangar 1, Duluth International Airport 4535 Airport Approach Rd	(218) 727-2911	N/A	N/A	N/A

		Duluth, MN 55811				
Sky Harbor	Municipal	5000 Minnesota Ave. Duluth, MN 55802	(218) 733-0078	3051 feet	Blacktop	100 Low Lead
JFK Memorial	Municipal	50511 State Hwy 112 Ashland, WI 54806	(715) 682-7070	5198 feet	Blacktop	100 Low Lead
R.I. Bong Memorial Airport	Municipal	4804 Hammond Ave. Superior, WI 54880	(715) 394-0282	4000 feet	Blacktop	Jet A, 100 Low Lead
Trans North Aviation, Ltd.	Aircraft Charter	133 Airport Road Eagle River, WI	(715) 479-6777 (800) 451-6442	N/A	N/A	N/a
Twin Ports Flying Service	Aircraft Charter	4804 Hammond Ave. Superior, WI 54880	(715) 394-6444	N/A	N/A	N/A
Gogebic County Airport	Municipal	E. 5560 Airport Road Ironwood, MI 49938	(906) 932-3121	6501 feet	Blacktop	Jet A, 100 Low Lead
Houghton County Memorial Airport	Municipal	23810 Airpark Blvd Laurium, MI 49913	(906) 482-3970	6501 feet	Blacktop	Jet A
Royale Air service	Aircraft Charter	6151 Sunset Rdg Duluth, MN	(218) 721-0405 (877) 359-4753	N/A	N/A	N/A
Superior Aviation	Aircraft Charter	250 Riverhills Road Kingsford, MI 49802	(906) 774-0400 (800) 321-1271	N/A	N/A	N/A

5230 VESSEL SUPPORT UNIT

The Vessel Support Unit is responsible for implementing the Vessel Routing Plan for the incident and coordinating transportation on the water and between shore facilities. Since most vessels will be supported by their infrastructure, the Vessel Support Unit may be requested to arrange fueling, dockage, maintenance and repairs of vessels on a case by case basis (see Section 5220). Duties include:

- Participate in Logistics Section/Support Branch planning activities.
- Coordinate the development of the vessel routing plan.
- Coordinate vessel transportation assignments with the Protection and Recovery Branch or other sources of vessel transportation.
- Coordinate water-to-land transportation with the Ground Support Unit, as necessary.
- Maintain a prioritized list of transportation requirements that need to be scheduled with the transportation source.
- Support out-of-service vessel resources, as requested.
- Arrange for fueling, dockage, maintenance and repair of vessel resources, as requested.
- Maintain an inventory of support and transportation vessels.

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

5240 GROUND SUPPORT UNIT

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

- Participate in Logistics Section/Support Branch planning activities.
- Develop and implement the Traffic Plan.
- Support out-of-service vessel resources.
- Notify the Resource Unit of all status changes on support and transportation vehicles.
- Arrange for and activate fueling, maintenance and repair of ground resources.
- Maintain Support Vehicle Inventory and transportation vehicles (ICS-218)
- Provide transportation services IAW requests from LSC or SUBD.
- Collect use information on rented equipment.
- Requisition maintenance and repair supplies, e.g. fuel, spare parts.
- Maintain incident roads.
- Submit reports to SUBD as directed.

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

5300 SERVICE BRANCH

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

- Obtain working materials.
- Determine the level of service required to support operations.
- Confirm dispatch of Branch personnel.
- Participate in planning meetings of Logistics Section personnel.
- Review IAP
- Organize and prepare assignments for Service Branch personnel.
- Coordinate activities of Branch Units.
- Inform LSC of Branch activities.
- Resolve Service Branch problems.

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

5310 FOOD UNIT

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

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

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

5320 MEDICAL UNIT

The Medical Unit under the direction of the SVBD, if established, or the LSC, and is primarily responsible for the development of the Medical Plan; providing medical care and overseeing health aspects of response personnel; obtaining medical aid and transportation for injured and ill response personnel; coordinating with other functions to resolve health and safety issues; and preparation of report and records. Duties include:

- Participate in Logistics Section/Service Branch planning activities.
- Establish the Medial Unit.
- Prepare the Medical Plan (ICS-206)
- Provide any relevant medical input into the planning process for strategy development.
- Coordinate with SOFR, Operations, Hazmat Specialists, and others on proper personnel protection procedures for incident personnel.
- Prepare procedures for major medical emergency.
- Develop transportation routes and methods for injured incident personnel.
- Ensure incident personnel patients are tracked as they move form origin, care facility and disposition.
- Provide continuity of medical care for incident personnel.
- Declare major medical emergency as appropriate.
- Provide or oversee medical and rehab care delivered to incident personnel.
- Monitor health aspects of incident personnel including excessive incident stress.
- Respond to requests for medical aid, medical transportation, and medical supplies.
- In conjunction with Finance/Admin Section, prepare and submit necessary authorizations, reports, and administrative documentation related to injuries, compensation or death of incident personnel.

- Coordinate personnel and mortuary affairs for incident personnel fatalities.
- Provide oversight and liaison as necessary for incident victims among emergency medical care, medical examiner and hospital care.
- Provide for security and proper disposition of incident medical records.

The following list of hospitals and ambulance services is provided:

Hospital Name	Location	Phone Number
Cook County Northshore Hospital	Grand Marais, MN	(218) 387-3040
St Lukes Hospital (Silver Bay)	Silver Bay, MN	(218) 226-4431
Miller Dwan Medical Center	Duluth, MN	(218) 727-8762
St. Lukes Hospital	Duluth, MN	(218) 726-5555
Essentia (St. Mary's) Trauma Center	Duluth, MN	(218) 786-4000
Lake View Memorial	Two Harbors, MN	(218) 834-7301
Lakewood Health Center	Baudette, MN	(218) 634-2120
Roseau Area Hospital	Roseau, MN	(218) 463-2500
Virginia Regional Medical Center	Virginia, MN	(218) 741-3340
Redwood Area Hospital	Redwood Falls, MN	(507)-637-4510
Falls Memorial Hospital	International Falls, MN	(218) 283-4481
St. Mary's Hospital – Superior	Superior, WI	(715) 395-5400
Memorial Medical Center	Ashland, WI	(715) 685-5500
UP Health System Portage Hospital	Hancock, MI	(906) 483-1000
Aspirus Keweenaw Hospital	Laurium, MI	(906) 337-6560
Baraga County Memorial	Baraga, MI	(906) 524-3300
Ontonagon Memorial Hospital	Ontonagon, MI	(906) 884-4134
Grandview Hospital	Ironwood, MI	(906) 932-2525

Ambulance Service	Location	Phone Number
MN NE Region:		
Cook County Ambulance Service	Cook, MN	(218) 666-2866
Gold Cross Ambulance	Duluth, MN	(218) 722-0807
Two Harbors Ambulance Service	Two Harbors, MN	(218) 834-7219
Roseau Ambulance	Roseau, MN	(218) 463-4302
WI:		
Bayfield Community Ambulance	Bayfield, WI	(715)779-9501
Marengo Ambulance (Dispatch)	Ashland, WI	(715) 682-7023
Mason Ambulance	Ashland, WI	(715) 765-4449
Air Ambulance International	Ashland, WI	(800) 227-5666
MI:		
Mercy Ambulance	Hancock, MI	(906) 482-0911
Bay Ambulance	Baraga, MI	(906) 353-6789
Donken Ambulance Service	Ontonagon, MI	(906) 884-4901
Beacon Ambulance	Ironwood, MI	(906) 932-4444

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

5400 COMMUNICATIONS UNIT

The Communications Unit is responsible for developing plans for the effective use of incident communications equipment and facilities; installing and testing communications equipment; supervision of the Incident Communications Center; distribution of communications equipment to incident personnel; and maintenance/repair of communications equipment. Duties include:

- Determine Unit personnel needs.
- Prepare and implement the Incident Radio Communications Plan (ICS-205)
- Ensure the Incident Communications Center and the Message Center is established.
- Establish appropriate communications distribution/maintenance locations within the Base.
- Ensure communications systems are installed and tested.
- Ensure an equipment accountability system is established.
- Ensure personal portable radio equipment from cache is distributed per Incident Communications Radio Plan.
- Provide technical information as required on:
    - Adequacy of communications systems currently in operation.
    - Geographic limitation on communications systems
    - Equipment capabilities/limitations.
    - Amount and types of equipment available.
    - Anticipated problems in the use of communications equipment.
- Supervise Communications Unit activities.
- Maintain records on all communications equipment as appropriate.
- Ensure equipment is tested and repaired.
- Recover equipment from Units being demobilized.
- Additional information regarding this position can be found in Chapter 10 of the USCG IMH.

USCG VHF Frequencies:

Channel	Frequency	Comments
Marine Band Channel 81A	157.075 MHZ	A primary USCG operating frequency. Channel 81A is also the national marine pollution response coordination channel. This channel is a primary means of radio communications between the command, field teams, and contractor teams in pollution cases.
Marine Band Channel 83A	157.175 MHZ	USCG Auxiliary primary operating channel. COTP may preempt the use of this channel in emergencies.
Marine Band Channel 22A	157.100 MHZ	Primary USCG public liaison channel. Urgent marine broadcasts are announced on Ch 16 and are broadcast on 22A. During a pollution case, 22A may be used by USCG Stations to inform mariners of waterway hazardous conditions or restrictions.
Marine Band Channel 16	156.800 MHZ	International hailing and distress frequency. In a pollution case, 16 may be used by USCG Sector to alert mariners to

		urgent COTP information on Channel 22A. Only in the most extreme cases would MSU broadcast information directly on 16. NOTE: FCC regulations prohibit the use of Channel 16 by land mobile stations and non-SAR land fixed stations.
Marine Band Channels 21A and 23A	157.050 MHZ 157.150 MHZ	USCG operational channels controlled by the Sector Commander. During a pollution case or marine incident, information exchanged on these channels is relayed to command, unless conditions sufficiently urgent to require direct COTP use.
USCG Command and Control Channels	various	USCG to USCG tactical communications.

Communications Capabilities:

Communications System	**Comments**
Portable Communications Trailers	Transportable Communications Center (TCC) units are self-contained, prepositioned, rapidly deployed USCG maintained communications modules that operate in the HF, VHF, and UHF bands. They can be used for ground to air, ground to ship, and point to point non-secure communications. The TCC consists of an air equipment shelter/trailer with installed electronic equipment and one portable generator. The use of this equipment shall be requested through CG District Nine Command Center at (216) 902-6117 (24 hours).
Teleconference Capability	The NRC is capable of establishing a teleconference of up to 60 participants. The system is intended for use in support of emergency response operations, but can be made available on a limited basis for routine matters. FOSCs and the RRT Chairs may request establishment of a teleconference by contacting the NRC Duty Officer at (800) 424-8802. UC staff may request emergency conferences at any time, but should provide one-day advance notice whenever possible. FEMA has a dedicated teleconference system. Contact FEMA Response and Recovery Division V at (312) 408-5500. CG District Nine Command Center at (216) 902-6117 (24 hours) has a teleconference line.
Cell Phones	FOSCs, their representatives, and most state and local response organizations are issued and utilize cell phones. It should be noted there is limited coverage in more remote areas.
Telefax/Scanners	Facsimile transmission is used to exchange complex information quickly and accurately to response agencies, technical experts and personnel with a need to know. Most agencies have a dedicated fax machine. Presently, scanned documents sent though computer systems seem to be used more frequently than facsimile.
Computer Communications Systems	Email allows direct and succinct information to be communicated to most individuals/agencies at anytime. Files, data, photos, and other information can be attached to standard messages. Email communication eliminates back-ups and busy signals on fax and phone lines; multiple communications can be forwarded simultaneously; data transfer is close to real-time. NOAA's First Class E-Mail system is an electronic communication network. Email can be sent or received between RRT and NRT members, contractors, and state and federal spill response agencies with accounts on the system.
USCG CAMSLANT C3I Deployable Contingency	**Transportable Multi-Agency Communication Central (TMACC)** Developed to support joint and multi-agency operations, with a broad range of

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

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

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

Manning: MCV, TMACC, EMICP, MPAT, PSK deploy with a combination of OS, ET, IT and MK support. This core crew transports the asset, completes initial set up, and remains on scene throughout the duration of the deployment to train supplemental watch standers and for troubleshooting purposes. The requesting District is responsible for providing TONO's to cover TAD costs for the core crew (CAT Team) from CAMSLANT and for supplemental TAD personnel required for watch standing during ongoing operations. Meals and lodging expenses for TAD personnel must also be considered. If commercial power is not available diesel fuel will be required to power generators. Oily waste disposal may be required.

Short notice emergency requests for Deployable Communications Equipment can be initiated via phone call and /or email to OSC Dawn Gray, or LANTAREA //LANT-36//.

Phone inquires about CAMSLANT's Deployable Communications Equipment/Services can be directed to CAMSLANT's CAT Team Supervisor at (800) 742 8519 (option 0) after normal working hours or email CML-DG-CAT at CML-DG-CAT@USCG.MIL.

Submit message request for Deployable Communications support as follows:

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FM (REQUESTING COMMAND)
TO (DISTRICT COMMANDER)
COMLANTAREA COGARD PORTSMOUTH VA//LANT-3/LANT-36//
INFO COGARD CAMSLANT CHESAPEAKE VA
COGARD SILC NORFOLK VA//T/TE-1/TS-2//
(OTHER ADDEES AS REQUIRED)
B T UNCLAS //N02014//
MSGID/GENADMIN/COMMAND NAME/-//
SUBJ/C3 EQUIPMENT REQUEST//
POC/UNITS POC/UNIT/PRIPHONE/SECPHONE/EMAIL ADDRESS//
RMKS/1. REQUEST AUTHORIZATION TO UTILIZE THE FOLLOWING CONTINGENCY COMS EQUIP IN SUPPORT OF (PENDING
OPERATIONS, TRAINING, EXERCISES, ETC.):
A. EQUIPMENT:  (MCV, TMACC, EMICP, MPAT, PSK)
B. PERIOD OF REQUIREMENT: (I.E. 01 JAN - 25 JAN 10)
C. DEPLOYMENT LOCATION: (I.E. CLEVELAND, OH)
D. COMMUNICATIONS REQUIREMENTS: (BRIEFLY SUMMARIZE CONCEPT OF OPERATIONS AND COMMUNICATIONS
REQUIREMENTS NEEDED TO MEET OBJECTIVE).
E. FUNDING: (TONO FUNDING LINE OF ACCOUNTING REQUIRED TO SUPPORT TAD AND OPERATIONAL COSTS OF
PERSONNEL DEPLOYED IN SUPPORT OF MCV/TMACC/EMICP/MPAT/PSK. EACH ASSET DEPLOYS WITH AT LEAST ONE
COMMUNICATIONS SUPERVISOR FOR TRAINING
PERSONNEL AND ONE ELECTRONICS TECHNICIAN FOR EQUIPMENT SUPPORT. IF AUXILIARY POWER (DIESEL/GAS
GENERATORS) WILL BE USED, APPROPRIATE COST WILL BE BASED ON USAGE TIME AND CURRENT COST OF FUEL.)
F. ITINERARY: (IF KNOWN, LIST DATES FOR PLANNING AND EXECUTION PHASES OF MISSION AND/OR OPERATION)
2. MISCELLANEOUS INFORMATION: (AS REQUIRED)//
B/T
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5410 COMMUNICATIONS SUPPORT

Unit or Activity	Phone Number(s)
Ninth Coast Guard District Comms Center	(216) 902-6117
CAMSLANT (Deployable Contingency Command, Control and Communications, - C3I Equipment	(757) 421 6288/6253/6207 (757) 398 6499/6338 (800) 742 8519 (Option 0) After Hours
LANTAREA//LANT-36	(757) 398-6338
ESU Cleveland	(216) 902-6115 (Telecoms)
TISCOM	(800) 847-2479
Atlantic Strike Team Comms Trailer	(609) 724-0008/0009

5410.1 RADIO AMATEUR CIVIL EMERGENCY SERVICE (RACES)

Radio Amateur Civil Emergency Service (RACES) is a public service that provides a reserve communications group within government agencies in times of extraordinary need. During periods of activation, RACES personnel are called upon to perform many communications related tasks for government agencies they serve. Although the exact nature of each activation will be different, the common thread is communications. RACES can be activated through the local county Emergency Manager.

The Federal Communications Commission (FCC) is responsible for the regulations of RACES operations. The Amateur Radio Regulations, Part 97, Subpart F, were created by the FCC to describe RACES operations in detail.

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

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

5500 USCG BASE CLEVELAND SUPPORT

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

5510 ESU/NESU CLEVELAND

- ESU Command/C4IT (216) 902-6155
- Command Duty Officer (216) 536-2619
- NESU Command/Naval Engineering (216) 902-6190

5600 Reserved

5700 Reserved

5800 Reserved

5900 Reserved for Area/District

6000 FINANCE/ADMINISTRATION

6010 FINANCE/ADMINISTRATION SECTION ORGANIZATION

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

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

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

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

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

6100 FINANCE SECTION CHIEF (FSC)

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

- Review operational plans and provide alternatives where financially appropriate.
- Manage all financial aspects of an incident.
- Provide financial and cost analysis information as requested.
- Gather pertinent information from briefings with responsible agencies.
- Develop an operating plan for the Finance/Admin Section; fill supply and support needs.
- Meet with assisting and Cooperating Agency Representatives, as needed.
- Maintain daily contact with agency(s) administrative headquarters on Finance/Admin matters.
- Ensure that all personnel time records are accurately completed and transmitted to home agencies, according to policy.

• Provide financial input to demobilization planning.
• Ensure that all obligation documents initiated at the incident are properly prepared and completed.
• Brief agency administrative personnel on all incident-related financial issues needing attention or follow-up prior to leaving incident.
• Develop recommended list of Section resources to be Demobed and initial recommendation for release when appropriate.
• Receive and implement applicable portion of the incident Demobilization Plan.

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

6200 FUND Use

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

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

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

- The NCP places responsibility for spills from federal vessels and installations on the owning federal agency to use its own funding.
    - However, the FOSC can use the OSLTF as a last resort to clean up or prevent oil discharges. When the responsible federal agency is capable of funding the clean up, the FOSC should attempt to establish a Military Interdepartmental Purchase Request (MIPR) or equivalent to reimburse the use of FOSC and OGA pollution response equipment and personnel time.

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

6210 FOSC ACCESS TO OSLTF AND CERCLA

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

6210.1 OSLTF

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

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

6210.2 CERCLA

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

- A hazardous substance (not oil under 33 USC 2701(33)) has been released, or there is substantial probability that it will be released
- The release (or probable release) presents an imminent and substantial threat to the public health or welfare
- The RP is failing to take appropriate actions or it is necessary to monitor the actions of the RP to assure they are taking appropriate actions.

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

6300 Procurement Processes and Procedures

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

6400 Trustee Access to the Oil Spill Liability Trust Fund

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

6410 STATE ACCESS

6410.1 STATE ACCESS TO FUND – DIRECT AND INDIRECT

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

The SOSC may access the OSLTF directly by contacting the cognizant FOSC, and indicating that they are making a request for direct access to the Fund. (This person must be designated, in writing, by the Governor of the state, and on file at the NPFC). The FOSC makes a determination that the request is authorized or not, and contacts the NPFC and District (R) by the following work day. If the request is

authorized, the FOSC forwards the request to the NPFC to obtain a Federal Project Number (FPN). The CANAPS product set will forward the FPN/Cost Ceiling to the state, with a copy to the FOSC.

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

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

6420 STAFFORD DISASTER RELIEF & EMERGENCY ASSISTANCE ACT FUNDING

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

Under the Stafford Act, the USCG FOSC may receive direct tasking in the form of a Mission Assignment (MA), a work order issued by the Federal Emergency Management Agency (FEMA)(or other designated agency), directing the recipient agency to complete a specified task. ESF #10 – Hazardous Materials Response Annex of the NRF includes both oil and hazardous materials response activities. In the execution of a mission assignment, the FOSC will use existing funds, resources, and contracts for goods and services to complete the task. The FOSC will then review the actual expenses against the estimated costs and make payments to OGA and private vendors for each cost. For oil spills and hazardous materials releases, the FOSC will receive a "Request for Federal Assistance" from FEMA or the ESF lead agency, including a cost ceiling, and will then proceed to respond as normal using the OSLTF or CERCLA funds as applicable, including the "Request for Federal Assistance" form in the cost documentation. It is important to recognize that Stafford Act funds, like OSLTF and CERCLA funds, may only be applied to response costs directly related to the tasking and the Stafford Act ceiling must be managed carefully just as other fund ceilings.

6420.1 STAFFORD ACT FUND USE CRITERIA

- There must be a Presidential Declaration of Disaster (natural or other).
- The affected state that has requested assistance will contribute matching funds.
- FEMA has to issue a MA to the USCG identifying the work to be done and authorizing spending.

- Use of Stafford Act differs from typical pollution response. States are expected to deal with most problems, and the federal government only becomes involved when state resources are not sufficient for the disaster response.
- Stafford Act responses can be geographically limited (e.g., certain counties in a state).

6420.2 LEGAL/REGULATORY FRAMEWORK FOR RESPONSE

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

6420.3 NON-COAST GUARD PARTICIPANTS

- The funding process for Stafford Act Pollution Response (ESF-10), from the FOSC perspective is similar but not identical to oil or hazardous material responses.
- USCG Stafford Act responses must have an approved FEMA Mission Assignment (MA) in place or the USCG cannot seek reimbursement after the response is completed. The FEMA MA defines what is to be done, where, and sets a spending limit.
- When the FOSC utilizes Stafford Act Funds, most of the resources of the NCP are at his/her disposal, including contractors and other federal agencies (but not state or local agencies).
- The FOSC can hire contractors through BOAs.
- The FOSC can provide funding to federal government responders through incident-specific PRFAs (but not state or local agencies).
- The Stafford Act provides separate and distinct claims procedures for Third Party claims within its overall disaster response system in the FRP.

6500 COST UNIT

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

- Coordinate with agency headquarters on cost reporting procedures.
- Collect and record all cost data.
- Develop incident cost summaries.
- Prepare resources-use cost estimates for the Planning Section.
- Make cost-saving recommendation to the FSC.

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

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

6510 COST DOCUMENTATION PROCEDURES, FORMS, REPORTS

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

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

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

6600 TIME UNIT

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

- Determine incident requirements for time recording function.
- Determine resource needs.
- Contact appropriate agency personnel/representatives.
- Ensure that daily personnel time recording documents are prepared and in compliance with agency(s) policy.
- Establish time unit objectives.
- Maintain separate logs for overtime hours.
- Submit cost estimate data forms to the Cost Unit, as required.

- Maintain records security.
- Ensure that all records are current and complete prior to demobilization.
- Release time reports form assisting agency personnel to the respective Agency Representative prior to demobilization.
- Brief the FSC on current problems and recommendations, outstanding issues and follow-up requirements.

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

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

6700 COMPENSATION/CLAIMS UNIT

The Compensation Unit Leader (COMP) is responsible for the overall management and direction of all administrative matters pertaining to compensation for injury and claims related activities (other than injury) for an incident. This unit handles “insurance” related matters. It manages any medical costs, death benefits, and personnel claims. It also manages Oil Spill Liability Trust Fund claims when the responsible party is not handling claims. Duties include:

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

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

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

6800 PROCUREMENT UNIT

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

- Coordinate with local jurisdiction on plans and supply sources.
- Obtain the incident Procurement Plan.
- Prepare and authorize contracts, building and land-use agreements.
- Draft memoranda of understanding as necessary.
- Establish contracts and agreements with supply vendors.
- Provide for coordination between Ordering Manager (ORDM) and all other procurement organizations supporting the incident.
- Ensure that a system is in place that meets agency property management requirements. Ensure proper accounting for all new property.
- Interpret contracts and agreements; resolve disputes within delegated authority.
- Coordinate with Compensation/Claims Unit for processing claims.
- Complete final processing of contracts and send documents for payment.
- Coordinate cost data in contracts with the COST.
- Brief FSC on current problems and recommendations, outstanding issues and follow-up requirements.

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

This unit is staffed with procurement specialists. USCG Shore Infrastructure Logistics Center (SILC) can provide contracting assistance as necessary. SILC is responsible for issuing Delivery Orders to BOA Contractors after the FOSC issues the Authorization to Proceed (ATP). In addition, this staff negotiates non-BOA contract items with commercial contractors to perform activities as required by the FOSC. They will conduct cost and price analysis as necessary to determine reasonable cost and review and approve invoices from contractors.

6810 COMMANDING OFFICER FOSC FUND AUTHORITY

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

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

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

For response to a hazardous materials release incident, the FOSC has discretion to allocate a cost ceiling of $250,000. For ceiling amounts exceeding $250,000 per incident, an Action Memo must be approved by the USEPA.

6900 RESERVED FOR AREA/DISTRICT

7000 INTELLIGENCE/INVESTIGATIONS

7010 INTELLIGENCE/INVESTIGATIONS SECTION ORGANIZATION

The Intelligence/Investigations Section (I/I) is responsible for conducting investigations to determine cause(s) of an incident and provide Command intelligence information that could influence the response activities of an incident. This Section can include an Investigative Operations Group, Intelligence Group, Forensic Group and Investigative Support Group. The IC/UC will determine the need for an I/I Section and designate a qualified individual to fill the role of I/I Section Chief (ISC).

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

7020 INTELLIGENCE/INVESTIGATIONS SECTION IMPLEMENTATION

Activation and implementation of the I/I Section as described in reference (a) is generally driven by three activities.

- Marine Casualty Investigation.
- Intelligence driven preventive PWCS operations.
- Criminal Investigation.

This activity driven application the I/I Section is needed due to the different levels of sub-specialties and integration of the I/I Section into the full IMT during these two similar concepts.

The type of investigation dictates the level of integration allowed between the I/I Section and the full IMT. Guidance for all three activities is outlined below.

The first activity, and most typical in the Coast Guard, is the activation of an I/I Section during a marine casualty investigation.

The second activity is the activation of an I/I Section for enhanced preventive operations conducted based on intelligence, but without an actual incident occurring. An example would be a port security level increase to MARSEC 2 based on intelligence.

The third activity is the activation of an I/I Section during a criminal investigation.

7100 INTELLIGENCE/INVESTIGATIONS SECTION CHIEF

The ISC, a member of the General Staff, is responsible for the management of intelligence and investigation activities. The ISC is normally selected from the organization with the most jurisdictional or functional responsibility for the intelligence or investigation activities.

The responsibility of the ISC is to provide Command intelligence information that could have a direct impact on the safety of response personnel and influence the disposition of maritime security assets involved in the incident response.

The ISC activates and supervises ICS organization elements in accordance with the IAP and directs IAP implementation. The ISC also directs the preparation of intelligence and investigation plans, requests and releases resources, monitors operational progress, makes expedient changes to the IAP when necessary, and reports those changes to the IC/UC.

Actual responsibilities of the ISC will be incident/situation dependent. The use of Deputies is highly encouraged based upon workload and specialty knowledge needs.

The major responsibilities of the ISC are:

Generic responsibilities of the ISC:

- Evaluate and request sufficient supervisory staff for both operational and planning activities.
- Supervise I/I Section personnel in executing work assignments while following approved safety practices.
- Evaluate I/I operations and make adjustments to the organization, strategies, tactics, and resources as necessary.
- Advise RESL of changes in the status of resources assigned to the I/I Section.
- Monitor the need for and request additional resources to support I/I operations.
- Identify and use staging areas.
- Identify kind, type, and number of resources required to support selected strategies.
- Determine the need for any specialized resources.
- Work with the PSC and OSC to develop I/I aspects and components of the IAP, including incident objectives, strategies, tactics, and priorities; information on resources, reserves, services, and support; and I/I operations.
- Review and approve final I/I Section related ICS 204-CG prior to IAP approval.
- Coordinate planned activities with the SOFR to ensure compliance with safety practices.
- Ensure that activities related to the formulation, documentation, and dissemination of the IAP and other planning activities do not jeopardize the investigation, intelligence sources, violate operations security or information security procedures, measures, or activities.
- Assist with development of long-range strategic contingency and demobilization plans.
- Develop list of I/I Section resources to be demobilized and initiate recommendation for release.
- Receive and implement applicable portions of the incident Demobilization Plan.
- Participate in meetings and briefings as required.
- Coordinate with the PIO to develop I/I related public information for release.
- Coordinate with the PIO to ensure that public information-related activities do not violate or contradict operations security or information security procedures.
- Conduct debriefing session with the IC/UC prior to demobilization.
- Maintain Unit Log (ICS 214-CG) and forward to DOCL for disposition.

Investigation related responsibilities of the ISC:

- Supervise the marine casualty investigation.
- Support the development of investigation related CIRs.
- In coordination with the OSC, develop and implement procedures to prevent interference with investigations activities.
- Manage evidence collection, chain of custody, and disposition.
- Frequently communicate and coordinate with the OSC regarding tactical intelligence/investigations-related activities (e.g., execution of a warrant, arrests, physical surveillance, electronic surveillance, etc.), and involve the respective legal authorities (e.g., prosecutors' office, magistrates, and courts of jurisdiction) as required.
- Provide investigation briefings to the appropriate agencies as requested.

Intelligence related responsibilities of the ISC:

- Provide intelligence briefings to the IC/UC as requested.
- Establish liaison with and incorporate LE and intelligence agencies including the CG Investigative Service (CGIS), Federal Bureau of Investigation (FBI)/Joint Terrorism Task Force (JTTF), and state and local police departments as appropriate.
- Support the development of intelligence related CIRs.
- Provide intelligence briefings in support of the Operational Planning Cycle.
- Collect and analyze incoming intelligence information from all sources for applicability, significance and reliability.
- Provide the SITL with periodic updates of intelligence and investigation situation status as allowed by operations security or information security requirements.
- Review the IAP for intelligence and investigation implications.
- Conduct first order analysis on all incoming intelligence and fuse all applicable incoming intelligence with current intelligence holdings in preparation for briefings.
- In coordination with the DOCL, establish and maintain systematic, cross-referenced intelligence records and files.
- Prepare all required intelligence reports and plans.
- Evaluate the current situation, and estimate the potential future situation.
- Support the SITL in the development of an accurate common operating picture to maximize situational awareness.
- Support the COML in development and implementation of an incident-specific Communications Plan, particularly if secure communications systems or security protocols are appropriate.
- Request a sufficient number of communications devices, including secure communications devices (e.g., secure telephone equipment, mobile Sensitive Compartmented Information Facility (SCIF), and secure video teleconference system).
- Implement audio, data, image, and text communications procedures, measures, and activities throughout the command structure to facilitate the sharing of classified information, sensitive compartmented information, and sensitive information.

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

7200 INVESTIGATIVE OPERATIONS GROUP SUPERVISOR (IOGS)

The Investigative Operations Group manages and directs the overall investigative effort for the ISC. The IOGS is the primary case investigator.

The major responsibilities of the IOGS can be found in Chapter 9 of the USCG IMH.

7300 INTELLIGENCE GROUP SUPERVISOR (IGS)

The Intelligence Group is responsible for three major functions: (1) information intake and assessment; (2) operations security, operational security, and information security; and (3) information/intelligence management.

The SITL is the primary node for overall information management - both unclassified and classified information. The IGS is responsible for providing incident awareness and assessment in support of and in coordination with the SITL.

The IGS can provide data and information from a wide variety of sources (e.g. government and commercial satellites, government and non-government aircraft, various ground and ship-based platforms, and people from various organizations).

As an incident rises in complexity or involves a more substantial amount of sensitive information and information management methodologies there may be a need to establish an IGS. The IGS is established within the I/I Section to facilitate accurate and efficient information flow with the SITL and other planning units. A formal Information Management Plan should be developed when the IGS is staffed due to the complexity of the incident and information requirements.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

7400 FORENSIC GROUP SUPERVISOR

The Forensic Group is responsible for managing crime scenes and processing forensic evidence, digital and multimedia evidence, and decedents. The Forensic Group ensures proper examinations, analyses, comparisons, and enhancements of forensic evidence, digital and multimedia evidence and decedents by the appropriate laboratories, analytical service providers, and morgues. The Forensic Group coordinates with the Mass Fatality Management Group and the medical examiner/coroner on matters related to the examination, recovery, and movement of decedents.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

7500 INVESTIGATIVE SUPPORT GROUP SUPERVISOR

The Investigative Support Group works closely with the Command and General Staffs, particularly the Logistics Section and Planning Section, to ensure that necessary resources, services, and support are obtained for the I/I Section.

The major responsibilities of the IGS can be found in Chapter 9 of the USCG IMH.

7600 Reserved

7700 Reserved

7800 Reserved

7900 Reserved for Area/District

8000 MARINE FIRE FIGHTING

INTRODUCTION

The Coast Guard has traditionally provided firefighting equipment and training to protect its vessels and property. COTPs are also called upon to provide assistance at major fires on board other vessels and waterfront facilities. Although the Coast Guard clearly has an interest in fighting fires involving vessel or waterfront facilities, local authorities are principally responsible for maintaining necessary firefighting capabilities in U.S. ports and harbors. The Coast Guard renders assistance as available, based on the level of the training and the adequacy of equipment. The Commandant intends to maintain this traditional "assistance as available" posture without conveying the impression that the Coast Guard is prepared to relieve local fire departments of their responsibilities. Paramount in preparing for vessel or waterfront fires is the need to integrate Coast Guard planning and training efforts with those of other responsible agencies, particularly local fire departments and port authorities. Additionally, a vessel/facility's owner/operator is ultimately responsible for the overall safety of vessel/facilities under their control, including ensuing adequate fire fighting protection.

Major marine firefighting incidents will require the coordinated efforts of federal, state and local resources to carry out the level of response required. The purpose of this fire fighting section is to provide guidance to the Captain of the Port (COTP) and local fire agencies to ensure coordinated responses to marine fires occurring throughout Western Lake Superior within the COTP Duluth zone. Recently requirements were put in place for vessels carrying Group I-IV oils which are required to have a Vessel Response Plan (VRP) to have Salvage and Marine Firefighting Service Providers (by contract or other approved means) listed in their respective VRPs. See Title 33, Code of Federal Regulations, Part 155.4010 (Subpart I – Salvage and Marine Firefighting). In June 2015 a Marine Firefighting Tabletop Exercise was held in Duluth, MN. The Western Lake Superior Area Spill Management Team's key decisions are documented in Section 8490 of this plan.

The COTP exercises primary federal responsibility for the safety and security of the port. This responsibility is discharged by enforcing dangerous cargo regulations, marine terminal safety regulations, vessel/facility security regulations & pollution prevention regulations. In emergencies, the COTP may control the movement of vessels, establish safety zones and provide on scene forces.

The COTP may be the Incident Commander (IC) for any fire involving a vessel underway or anchored within the AOR. For a moored shipboard fire, the local fire department is the IC and the COTP will provide support to the Fire Chief (IC). For any vessel fire, the local and mutual aid fire departments will be the primary fire fighting resources. When fire is involved at a shore side facility, the local fire department is the IC.

UNIFIED COMMAND

As previously outlined in Section 2000 the ICS UC is an application of ICS used when there is more than one agency with jurisdiction or when incidents cross political boundaries. Agencies work together through designated members of the UC to establish their designated Incident Commanders at a single ICP to establish a common set of objectives and strategies in an Incident Action Plan (IAP). This is accomplished without losing or abdicating authority, responsibility, or accountability. UC is responsible for overall management of the incident by bringing together a single command structure thereby enhancing preparedness and response and recovery activities. UC is not a "decision by committee".

The AC adopted ICS/UC as the basic model for operating a coordinated response. Under the UC structure, federal government, state, and responsible party will each provide an IC, who will consult with each other and share decision-making authority regarding spill response and clean-up management issues. Depending on the circumstances of the incident, a local or tribal entity may also provide an IC. Together, these ICs will jointly serve as UC. In doing so it brings together the expertise, resources, and equipment of many organizations so that the incident can be handled in the safest, quickest, and most efficient manner.

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

COTP AUTHORITY

The COTP has the authority, under 14 USC 88(b), to render aid and save life and property in the event of a marine related emergency (including fire), within the capabilities of available Coast Guard resources.

Among the provision of the Ports and Waterways Safety Act (PWSA) of 1972 (33 USC 1221 et seq.) is an acknowledgement that increased supervision of port operations is necessary to prevent damage to structures in, on, or adjacent to the navigable waters of the U.S., and to reduce the possibility of vessel or cargo loss, or damage to life, property and the marine environment. The COTP has the authority under the Ports and Waterways Safety Act (PWSA 33 USC 1223; 1225) to direct the anchoring, mooring and movement of a vessel.

42 USC 1856 – 1856d provides that an agency charged with providing fire protection for any property of the United States may enter into reciprocal agreements with state and local firefighting organizations to provide for mutual aid. This statement further provides that emergency assistance may be rendered in the absence of a reciprocal agreement, when it is determined by the head of that agency to be in the best interest of the United States. A mutual aid agreement exits between many of the local municipal fire departments and industrial entities.

FWPCA, as amended (33 USC 1321 et seq.) the Commandant of the Coast Guard, acting under the authority delegated to him/her for pollution discharge response and removal, may whenever a marine disaster in the navigable waters of the United States has created as substantial threat of pollution, coordinate and direct all public and private efforts directed at the removal of such threat and summarily remove and if necessary destroy such vessel. This may occur in the instance of a discharge or an imminent threat of a discharge of large quantities of oil or hazardous substance from a vessel. Section 4202 of OPA 90 (Public Law 101-380) mandates that the Coast Guard maintain an Area Contingency Plan of pollution response equipment (including firefighting equipment) within each port.

ROLE OF THE COTP

Upon notification of a vessel or waterfront fire, the COTP shall immediately determine the vessels in the fire area and the cargo they are carrying. The COTP shall notify vessel shipping agents of their vessels involvement or possible involvement and any anticipated need to move them. Coast Guard personnel should contact all vessels both in and outside the fire area and advice the deck watch officer/master of the situation and the possible need to get underway. MSU Duluth maintains a “Fire on a Waterfront Facility QRC (246)” to ensure proper notifications/decisions are made.

All Coast Guard fire fighting forces and equipment within a COTP’s Area of Responsibility (AOR) shall be under the control of the COTP. The COTP is responsible for the development of the marine fire fighting section of the ACP with input from local response organizations, training of Coast Guard personnel, and coordination of Coast Guard personnel during incident response. The COTP shall act as the liaison between the Coast Guard and other response organizations and the media. Orders from the Unified Commander for Coast Guard responders shall be passed through and evaluated by the COTP. Only those orders that will not create unwarranted risk for Cost Guard personnel and equipment shall be executed. The COTP shall not assume overall control of fire fighting efforts when appropriately qualified fire officer are present and able to take control.

NOTIFICATIONS

Prompt notification of all necessary parties is of utmost importance. Whenever MSU Duluth learns of a vessel or waterfront facility fire the unit will promptly make timely notifications utilizing the Western Lake Superior ACP Emergency Notification Sheet located at the front of this plan and Fire on a Waterfront Facility QRC (246). Notifications in order of precedence shall likely be:

- ☐ 911 / Local Fire Department
- ☐ 1 800 DAD SAFE (Coast Guard – if applicable – Major Marine Casualty)
- ☐ National Response Center (fuel-oil/chemical releases) [see page xxi]
- ☐ Coast Guard Sector Sault Ste Marie (notify applicable Station - Duluth, Bayfield, Portage)
- ☐ State Duty Officer (MN, WI, MI) as applicable [see page xxi]
- ☐ County Emergency Manager(s) [see page xxi and/or 5000-7]
- ☐ State Lead Response Agency (MPCA, WI DNR, MI DEQ) [see page xxii]
- ☐ Vessel Owners/Operators [see CG MSU Inspection Department for listing]
- ☐ Waterfront Facility Owners/Operators [see pages 5000-15-22]
- ☐ Port Authority [see page 5000-19]
- ☐ Hospitals [see page 5000-24]
- ☐ Others as applicable in the ACP Emergency Notification Sheet
- ☐ Note: ensure Vessel O/O activated their Vessel Response Plan and notified their Salvage & Marine Firefighting Service Provider.

Note: During the 2015 PREP Area Spill Management Team Marine Firefighting TTX held in the Twin Ports, it was noted in the event of a major marine fire that the Local Fire Departments would likely notify each respective mayor's office. Similarly, the State's would brief their chain of command which may likely reach the Governor's Office.

OPERATIONS

See Section 3000 (Operations) of this plan for additional ICS Ops Section organization descriptions. In addition, information regarding Operations Section can be found in Chapter 7 of the U.S. Coast Guard's Incident Management Handbook (IMH) and information regarding marine fire fighting ICS structure can be found in Chapter 22 of the IMH which is posted on Homeport @ http://homeport.uscg.mil.

Chapter 12 of NFPA 1405 is Strategies and Tactics for Marine Firefighting. This chapter should be reviewed in its entirety. The strategies and tactics are broken down by the vessel fire location i.e., pump room fires, engine room fires, electrical room fires, etc. This section notes that vessel firefighting strategy necessitates that the IC choose between an offensive and a defensive strategy. The danger to firefighting personnel and exposure needs to be weighed against the danger to the vessel and cargo. It further notes that where resources are adequate and the vessel's environment is tenable, an offensive strategy might be appropriate. The IC can choose from a number of strategies ranging from an aggressive hand line attack to remote agent applications or smothering. Strategy is goal-oriented. The IC should develop a list of desired outcomes. Tactics should be continually evaluated against the desired outcomes. The ability to achieve tactical objectives serves as a guide to the feasibility of the strategic goals.

Defensive Strategy. Where resources are insufficient for extinguishment or where the danger to personnel, environment, or exposure outweighs other considerations, a defensive strategy might be appropriate. The IC's options are containment and exposure protection or removal of the vessel to an appropriate location.

General Tactics. There are many different types of fires that can occur aboard vessel. As with any fire incident, initial fire department actions should address rescue of endangered persons, protection of exposures, confinement, and prevention of fire spread. Other tactics and strategies, and their order of precedence vary depending on the type of fire situation and location on the vessel.

Fire Attack with Foam. Where foam is used as an extinguishing agent, it is imperative to postpone the application of the foam until sufficient quantities are available to effect complete extinguishment. The required rate of application needs to be calculated. NFPA 11 should be used to determine the application rate. The shipboard fixed system may be permitted to be included in the calculation, provided the system is reliable and charged. See NFPA 1405 12.9.1.2 for all foam application considerations.

Engine Room Fires. The main engine room provides propulsion power, electric power, and steam to the entire ship. Since this is the power center of the ship, an engine room fire renders all but emergency systems ineffective. Emergency systems might not operate due to fire damage or disrepair, or due to their being set in manual mode. Some engine spaces are separated by watertight bulkheads. If proper closures are made, systems located on the non-involved spaces might remain operational. Ships generally are provided with emergency power to supply critical systems such as emergency lighting. A main engine room fire usually is an oil fire, either at a flange or in the bilge, or it could be an electrical fire. An electrical fire in the main engine room should be handled as an electrical room fire. Due to varied arrangements and the equipment found in main engine room spaces, search and rescue operations are extremely difficult and hazardous. Assistance from the ship's crew might be necessary to safely overcome hazards such as high-pressure steam leaks, electrical shock, rotating equipment and difficult access. The six fire boundaries (fore, aft, port, starboard, above, and below) should be established and cooled. The dewatering needs and availability of the necessary equipment to accomplish immediate dewatering procedures should be determined. The secondary fire boundaries for staging of personnel and equipment should be identified and established. The status of the ship's fixed system (CO2, halon, foam) should be identified and evaluated. If the ship's fixed systems are available and operational, they should be used as soon as evacuation and closure of the space is completed. Entry into a space where fixed CO2 or halon has been released should be delayed to allow the agent to perform its function.

Firefighting equipment that might be available aboard the ship and might be of assistance to the fire fighter include the following: CO2, halon, foam and dry chemical portable extinguishers; CO2 and dry chemical hose reel extinguishers; foam applicators; fog applicators; piercing applicators; fire hose; and nozzles. The preferred agent of fighting a main engine room fire is foam. The amount of foam necessary and the amount available need to be determined. In addition, the compatibility of the available foam and foam-generating equipment need to be verified.

Entry into all machinery spaces should be made with extreme caution, as deck plates and gratings are routinely removed for equipment maintenance, creating trip and fall hazards. Areas of an engine room where fire is most likely to occur are at the bilge, diesel engine, boiler front, boiler casing, fuel strainer, and centrifuge and stack areas. A fire in the stack area of a ship can be further complicated by soot

deposits. If soot is aerated, it could ignite quickly. When mixed with water it forms sulfuric acid. The above are excerpts from NFPA 1405 Chapter 12 (Strategy and Tactics). Applicable sections for the type and location of the fire you are fighting should be reviewed in its entirety. In addition, Chapter 13 of NFPA 1405 is titled Incident Management System. This Chapter provides information on the NIMS Incident Command System (ICS). Specifically, the NIMS ICS Operations Section relating to marine fires and should be consulted.

MARINE INCIDENT INITIAL RESPONSE STRATEGY

Incident "Size Up" is a continual process at the heart of any response action. Any course of action must be based upon the available facts and probabilities. The size-up consists of six steps to rapidly form a deliberate plan of action. They are:

- Gathering facts;
- Assessing probabilities;
- Determining resources;
- Applying basic fire fighting principles;
- Deciding a quick course of action;
- Formulating a plan of operations.

Quickly gathering incident information, such as the exact location of the vessel, location of the vessel's master and crew, acquiring the vessel's documents (especially the fire plan), condition of the vessel (including status of the fuel and ballast tanks and any other flooding and disability issues), type and condition of cargoes on board, and identification of any special equipment needs. Incident probabilities, potential life hazards, explosions, damage, and fire extension must also be assessed. The dynamic nature of any fire response requires constant review, reevaluation, and revision.

In any fire, the speed and effectiveness of the initial response is the key to fire suppression. If the fire is not quickly controlled, the likelihood of a larger, more involved response increases. Presently, fires may be very complex as they increasingly involve a number of hazardous materials ranging from ship stores to ships cargoes although generally speaking within Western Lake Superior most cargoes are non-hazardous (taconite, coal, grain). Nationwide the increase in hazardous materials transported and stored along the waterways makes response to fire in the marine environment more unpredictable and more dangerous than in previous years. The dangers in responding personnel from hazardous substances, which may present at a fire, are similar to the dangers present during a response to a hazardous substance spill.

A closely coordinated effort is an essential factor in an effective marine firefighting response. The response organization will vary depending on the location of the fire and its severity. The level of Coast Guard involvement will range from Incident Commander to a coordinator/advisor level. The possibility of a spill of some type of pollutant always exists due to firefighting water runoff. The COTP, in his or her capacity as Federal On-Scene Coordinator (FOSC), will invariably be involved should this occur.

The following sections discuss some of the complexities involved in a coordinated response and guidelines for proper organization and action.

The Marine Safety Manual Volume VI Chapter 8 specifically addresses USCG fire fighting activities: "Generally, USCG personnel shall not actively engage in fire fighting except in support of a regular fire fighting agency under the supervision of a qualified fire officer. USCG personnel shall not engage in independent fire fighting operations, except to save a life or in the early stages of a fire to avert a significant threat without undue risk."

With this guidance, the local fire department with jurisdiction will be the Incident Commander for shipboard or waterfront facility fire fighting activities. The COTP Duluth works with port authorities, local governments, and fire departments within the AOR to maintain current and effective contingency plans, and to coordinate federal, state, municipal and commercial resources that respond to fires and other incidents. The COTP Duluth shall provide personnel to a marine fire incident to render assistance with vessel specific information, vessel stability, pollution abatement, enforcement of USCG specific authority, and/or waterside security.

OPERATIONAL FIRE FIGHTING PRIORITIES

It is impossible to anticipate every task or possibility that will be required to effectively respond to a major marine fire. There are, however, several basic priorities, which must be addressed, particularly in the case of a vessel fire at sea. The eight operational fire fighting priorities for marine fire incidents are listed below, in order of precedence:

Rescue – Life safety must always be the first consideration in any fire or emergency situation. When lives are in danger, the Incident Commander must quickly assess whether the situation necessitates immediate removal of personnel, the number of persons, which need to be extracted, and the hazards to the rescue team.

Exposures – The fire should be fought so as to prevent the spread of fire on or off the vessel. Typical exposures include flammable liquid or gas tanks, open stairways, explosives, or any other substance, which would accelerate or aid the spread of the fire. Provided there is no danger of water reactivity, exposures are best cooled by application of a fog pattern until no visible steam is generated. For some two-dimensional surfaces foam may be an appropriate agent for exposure protection.

Confinement – Control over the fire must be established by impeding the fire's extension to non-involved areas and limiting the fire to the area of origin. To accomplish proper containment, all closures and generally all ventilation (unless personnel are trapped inside the space) should be secured. Monitor and cool boundaries, as necessary, on all six sides of the fire (fore, aft, port, starboard, above, and below).

Extinguishment – The main body of the fire should be attacked and suppressed. The goal is to cease combustion by disrupting the cycle of the fire tetrahedron. Tactics and agents to be used will be determined by the fuel source, amount of fuel/surface area, and the location of the fire.

Overhaul – Actions to complete incident stabilization and begin the shift to property conservation should occur in any overhaul. Specific considerations include: hazards from structural conditions at the fire scene, atmospheric conditions (air packs should remain mandatory in the case of interior fire overhaul due to the likely presence of toxic vapors, carbon monoxide, and low oxygen levels), monitoring scene to ensure fire will not re-ignite, determination of fire's point of origin and source of ignition.

Ventilation – Ventilation tactics will vary depending upon the location and conditions of the fire. Generally, all ventilation on a vessel will initially be secured and all dampers shut upon receipt of a fire alarm. Utilization of ventilation to aid firefighting efforts should not begin until a coordinated attack is staged.

Stability – The use of water for firefighting can significantly raise the center of gravity of a vessel. This may cause the vessel to become unstable, turtle, and or sink, resulting in a much worse situation. Experts from the Marine Safety Center, Atlantic Strike Team, or Navy Support and Salvage should be consulted for stability calculations/advice. Please see additional information on vessel stability considerations below in this section.

De-watering – Oil and hazardous materials may enter the waters during de-watering operations. Containment and recovery of these materials is an important consideration. Fire fighting operations take precedence over environmental concerns. However, pollution response should be considered at this stage of response. The oil spill and/or hazardous materials response strategies listed below should be initiated at this stage. See additional information on dewatering below in this section.

The following is additional information which supports the eight operational fire fighting priorities for marine fire incidents noted above.

Vessel Stability Considerations. The stability of a vessel is described as its ability to resist heeling from the upright position at small angles of inclination. The large volumes of water often used in combating fires can have a negative impact on vessel stability, jeopardizing the safety of the vessel and the personnel onboard. The COTP or his designee may be expected to provide advice regarding vessel stability issues and should command a basic knowledge of the topic. A list of technical experts is complied as part of the marine fire fighting plan which includes the Coast Guard Marine Safety Center Salvage Team. The Marine Safety Center Salvage Team contact information is located in Section 4720 (Vessel Salvage and Lightering) of this plan. This team is always available to provide technical guidance on stability issues. At a minimum Coast Guard personnel who are likely to respond in an incident where stability of a vessel is at issue should be familiar with NFPA 1405 (checklist at the end of this plan) and Stability and Trim for the Ship's Officer. In addition, several vessel documents can be extremely useful in determining vessel stability. The most important of these is the vessel's trim and stability booklet. Other useful documents are the cargo plan, the docking plan, the capacity plan and the general

management plan. If these documents for some reason are not available on board the vessel, it should be available from the vessel's owner or operator.

Water Discipline. Water is the most prevalent fire extinguishing agent. Water suppresses fire through absorbing heat when converted into steam and the resulting smothering effect as steam displaces the air around the fire. Indiscriminate use of water, however particularly in vessel fires, can be as dangerous as the fire. In considering the use of water versus other extinguishing agents the questions of potential electrical hazards, the presence of any water reactive materials, and the problem of flooding and the resulting stability issues must be answered before proceeding.

At best, undisciplined water usage may precipitate excessive water damage and disrupt the thermal balance of an interior fire resulting in reduced visibility, and severe heat conditions from the production of large amounts of steam. The thermal balance is the discernible separation between the heated fire gases in the upper portion of a compartment and the relatively cooler air below. The heated gases may exceed 704 deg C (1300 deg F). Disruption of the thermal balance can be avoided for as long as possible by proper application of direct and indirect attack techniques. In the worst case, disregard for the amount of water put on board will deteriorate the vessel's stability. One gallon of water (approx 4 liters) weighs approximately 8.6 lbs; at a flow rate of 6 liters/second or 100 GPM a 1 M2 (12 ft2) space will be flooded in 0.152 mm (6 in) in roughly 5 minutes, adding approx 2 metric tons (2 tons) of weight. A 64 mm (2 ½") hose, which is commonly found on vessel weather decks, delivering 2 L/s (250), equates to approximately 54 metric tons (60 tons) per hour; while the 38 mm 1 ½" hose normally found at interior fire stations will deliver approximately 27 metric tons (30 tons) per hour.

The introduction of large amounts of water onto the vessel can also create a free surface effect which is particularly dangerous if the water is confined above the vessel's normal center of gravity. Personnel and equipment moving through watertight doors cause potential problems by disrupting flooding boundaries.

The most important consideration regarding vessel stability is the control of a vessel's list. Problems resulting from a failure to maintain a reasonable degree of transverse stability can include:

- Poor footing for response personnel;
- Difficulty in maintaining a foam blanket;
- Automatic fire door closure problems;
- Damage/injury from shifting of lose objects;
- Reduce effectiveness of fixed dewatering suctions and drains;
- Loss of use of vessel machinery due to sustained excessive list.

Vessel factor affecting stability includes:

- The free surface of all liquid on board;
- The integrity of the hull;
- Whether the double bottoms are empty or full;
- Integrity of watertight boundaries during flooding, and
- Flatness of the hull bottom if the vessel is in contact with the bottom.

Dewatering. A vessel will sustain a loss of stability from fire fighting water accumulation above the vessel's original water line. For this reason, dewatering is an essential planning issue for successful vessel fire fighting. Normally, vessels will have a limited amount of dewatering equipment. This equipment will often consist of a fixed pump and suction system to handle water which accumulates in the vessel's bilges and drain holes located in areas above the waterline to allow drainage overboard or into the vessel's bilge. Portable pumps are sometimes available on board, but their limited capability will not substantially aid dewatering efforts. Removal of toilets and showers to improve drainage will allow water to flow down into holding tanks below the waterline. While the weight of the water is still a factor, the shift in weight to the holding tanks will lower the vessel's center of gravity and improve transverse stability. In extreme cases, drainage holes may be cut in the superstructure. This practice, however, can be extremely dangerous and should not be pursued without the permission of the owner or other appropriate authority. In planning for the eventuality of a dewatering effort, consideration to the quality of discharged water and the need for containment must be evaluated.

List Correction. The basic causes of list are a negative meta-centric height (GM), or "angle of loll", which is caused by off center position of the vessel's center of gravity (CG). When in doubt as to the cause of the list, always attempt to lower the vessel's center of gravity. The following outlines a general sequence of actions to limit deterioration and potentially improve vessel stability:

- Establish flooding boundaries;
- Remove water from partially flooded areas;
- Jettison topside weight;
- Completely remove water from solidly flooded areas;
- Transfer weight (usually liquid ballast). If the list is caused by a location of the center of gravity off the vessel's centerline, shifting weight to the high side will remove the list, however, if negative GM is a factor of the list, transverse shifting of weight within the vessel will worsen the situation. In a case in which the center of gravity is located above the meta-centric height, the center of gravity must be lowered to correct the list.
- Add weight (counter flooding). Always start with the lowest spaces available, such as double bottom tanks. Never counter flood if free surface is the cause of the list. Problems resulting form added weight and free surface effect make counter flooding a last resort.

Vessel Fire Fighting Systems. The vessel's fire main system is the primary tool for defending the vessel from fire. There are two basic designs of fire main systems, the single main and the looped main. The looped main has certain advantages due to the ability to isolate sections of the system without disrupting service to the stations beyond that rupture section. Water pressure is supplied by on board fire pumps. The number of pumps will depend upon the vessel's tonnage; generally a vessel will have two pumps, a primary pump dedicated to supplying the fire main and reserve pump which may also supply the sanitary, ballast, bilge or general service system. The pumps require electrical power, but are tied into the vessel's emergency as well as primary ship service generators. Local response agencies should be aware that hose station connections on foreign vessels will likely have a different thread and that generally adapters will not be available. Therefore, if the decision is made to utilize the International Shore Connection and the vessel fire main fire fighters will be forced to rely on equipment which may be unfamiliar.

For detailed in-depth information on vessel fixed fire fighting systems see Marine Safety Manual, Volume VI, Chapter 8, and Coast Guard Firefighting Activities. This reference includes detailed information on fire main systems, water sprinkler systems, carbon dioxide systems and HALON systems.

OFF-SHORE FIRE FIGHTING CONSIDERATIONS

In the event of a fire on a vessel in Western Lake Superior, and the vessel's crew is unable to contain the fire, the USCG may act as the Incident Commander and take the necessary steps to protect U.S. interests under the authority of the Ports And Waterways Safety Act (PWSA) and/or the Federal Waters Pollution Control Act (FWPCA), as amended. Since local jurisdiction does not extend into Lake Superior, the USCG will utilize available State, Department of Defense and commercial resources. The primary concern with offshore fires, subsequent to successful search and rescue operations, will be the prevention of pollution to U.S. and Canadian waters and fouling of sensitive fishing areas, wildlife habitats, shorelines, economically important area, and not creating an obstruction to navigation.

DECISION TO ALLOW BURNING VESSEL TO ENTER PORT

A crucial decision in response to a marine fire involving a burning vessel is whether to allow it to enter the port. All actions regarding the positioning, movement, or mooring of a vessel on fire must be approved by the Coast Guard COTP.

Due to limited resources available to fight an offshore fire, the COTP may be forced to consider allowing a burning vessel to enter port. The numerous considerations that are part of the decision can be found in Marine Safety Manual Chapter 8, Volume VI. Additionally, the information concerning mooring, anchorage and grounding sites should be reviewed and considered as part of this decision.

Before allowing entry or movement of the vessel permitted, the vessel should be examined (with other involved agencies, if possible) to determine its condition. Permission for entry or movement may generally be granted when:

- The fire is already contained or under control;
- There is little likelihood that the fire will spread;
- A greater possibility exists that the fire may be extinguished with equipment available in-port before secondary explosion or spread of the fire; and
- All appropriate parties, including elected officials, have been consulted.

Once the decision to permit entry or movement of the vessel has been made, considerations should be given to:

- A safety broadcast and Notice to Mariners;
- Ordering the movement of other vessels or cargo stored in the area to preclude their involvement; and
- Locating the vessel to facilitate the use of available resource in fire fighting.

Liability factors in consideration should include:

- The amounts and types of insurance held;
- Verification of coverage for liability for any oil pollution removal costs, as evidenced by a valid Certificate of Financial Responsibility (COFR);
- Liability insurance for possible damage caused to other property;
- A surety bond, in an amount equal to the estimated cost of removing the vessel from the port.

Important Note: While these assurances are highly desirable, obtaining them may not be possible before action is required to save the vessel.

A burning vessel is only a small part of the resources which must be protected. Other resources include the environment, economy, trade, ports, other vessels and facilities. Entry into a port or movement within the port may have to be denied when:

- There is danger that the fire will spread to other port facilities or vessels;
- The vessel is likely to sink or capsize within a channel, becoming an obstruction to navigation;
- The vessel might become a derelict;
- Unfavorable weather conditions preclude the safe movement of the vessel or would hamper fire fighting (high winds, fog, strong currents, ice, etc.);
- A risk of serious pollution incident of oil or hazardous substance. The COTP should, in conjunction with Coast Guard District NINE response staff and the Regional Response Team (RRT), assess pollution risks and determine whether a vessel should be allow to enter port.

MOVEMENT OF A BURNING VESSEL

A crucial decision in response to a marine fire involves movement of a burning vessel – whether to allow it to enter the port, to move it to, or away from an anchorage or a pier, to ground the vessel, or to scuttle it offshore. All actions regarding the positioning, movement, or mooring of a vessel on fire must be consulted with and approved by the Coast Guard COTP. In addition, the decision to allow a burning vessel in the Port of Duluth or Superior must be decided by the COTP with discussions with each fire chief from the respective fire departments.

Among the considerations to evaluate in deciding whether to allow a vessel to move within a port are the following:

- Location and extent of fire;
- Capabilities and training of the crew;
- Status of shipboard firefighting equipment;
- Class and nature of cargo;
- Possibility of explosion;
- Hazards to the environment;
- Hazards to crew or other resources where vessel is situated;
- Forecast weather;
- Maneuverability of the vessel;
- Effect on bridges under or through which the vessel must transit;
- Potential for fire to spread to pier or shore side facilities;
- Fire fighting resources available shore side;
- Consequences or alternatives if the vessel is not allowed to enter port or move.

The success or failure of shipboard firefighting efforts is a condition of the vessel's location. If the vessel is remotely located or otherwise inaccessible, there may be little opportunity to save it. The COTP should coordinate with fire departments, port officials, and other involved agencies to pre-select moorage, anchoring or grounding sites for burning vessels. The following provides information on firefighting at piers, anchorages, and potential grounding sites.

FIREFIGHTING PIER

Piers are not the only sites that can or should be considered for relocation of a burning vessel. However, piers offer the greatest potential to maximize use of shore-base fire fighting resources. The following factors should be considered when selecting a pier:

- The severity of the fire;
- The proximity of the pier to populated areas;
- Bridges, highways, and environmentally sensitive areas;
- Availability of the pier for an extended period;
- Availability of adequate water supply and electricity;
- Construction of the pier (the flammability of pier structures and contiguous facilities);
- Prevailing winds;
- Availability of firefighting staging areas;
- Presence of hazardous materials at the pier and on the vessel;
- Availability of special equipment;
- Access for response boats and vehicles;
- Minimize the risk of impeding navigation;
- Location of low risk to facilities or vessel, consistent with minimizing the distance the vessel must be moved.

Note: The listing of a pier or facility in the plan does not mean that the Coast Guard or any other agency will unilaterally direct a burning vessel to that pier/facility.

ANCHORAGES

Anchorages may provide a suitable site for conducting marine fire fighting operations. Several factors should be considered when determining an appropriate anchorage site:

- Availability of fire fighting water;
- Effects on other facilities in the area;
- Boat/vessel access;
- Effect on navigation if the vessel sank or became derelict;
- Water depth;
- Currents;
- General weather conditions;
- Environmentally sensitive sites in the area.

GROUNDING SITES

Grounding sites must be approved by the COTP. A decision may be made to either ground or sink a vessel. In choosing grounding sites, several factors must be considered. The possibility of the vessel sinking or becoming a derelict must be considered. Such events could become a greater hazard to the marine environment through resultant pollution then the total loss of a single ship on a pre-designated area. There are no pre-approved grounding sites as they incident specific and must be evaluated on a case by case basis.

Important considerations for grounding include:

- Bottom Material: Soft enough that the ship's hull will not rupture;
- Water depth: Shallow enough that the vessel will not sink below the main deck, yet deep enough that fire boats, salvage barges and tugs can approach;
- Weather: Area not known to have strong winds or currents which could hamper fire fighting or salvage efforts/operations.

Intentional sinking of vessels. As a last resort, when a vessel and its cargo are deemed to be a constructive total loss due to a fire, an alternative to further fire fighting and salvage efforts may be to sink the vessel. See 40 CFR 229.3 (Transportation and disposal of vessels), which outlines authorities and general procedures. Except in extreme emergencies when vessel disposal is contemplated as a viable option, the vessel's flag state, EPA Regional Response Team (RRT) representative, and other parties known to have interest which may be affected should be consulted.

TERMINATION OF RESPONSE ACTIVITIES

The decision to terminate firefighting response activities will be made by the UC. Note: Although firefighting efforts may be terminated and the incident has been declared terminated by the UC, the vessel/facility should maintain a fire watch for at least 48 hours after the fire is out. The vessel/facility also may not be safe for entry during this time. Although firefighting operations may be terminated, salvage, oil spill and waterway management response/operations may likely be on-going.

RESOLUTION OF DISPUTES

Disputes will normally be resolved at the lowest level possible. If not resolved there, they will be referred to the Command Post for resolution between the senior Coast Guard representative and the Fire Department representative. If not resolved at the Command Post, they will be referred to the COTP and the appropriate Fire Chief for resolution. Detailed information regarding potential resolution of disputes is located in Section 2100-2 of this plan. Basically, this section states…*this cooperative relationship has worked well over the years and is the cornerstone for response to any incident. Common sense, recognition of others statutory responsibilities, and a spirit of cooperation during an incident are paramount. In unforeseen rare situations where UC consensus is not attained, the FOSC/COTP is*

charged with resolving the issue. If the issue warrants, the FOSC/COTP may defer to the Regional Response Team (RRT) for a final decision.

PLANNING

See Section 4000 of this plan (Planning), as well as federal, state, and local All-Hazard Contingency Plans either directly referenced in this document or implied by association of applicability. In addition, information regarding Planning Section can be found in Chapter 8 of the U.S. Coast Guard's Incident Management Handbook (IMH) and information regarding marine fire fighting ICS structure can be found in Chapter 22 of the Coast Guard 2014 IMH which is posted on Homeport.

Chapter 9 of NFPA 1405 is the Planning Section. This section states that the ship's Fire Control Plan is one of the most valuable assets on board the ship. Its primary purpose is to assist shore side fire fighting personnel. It is ideal for fire fighters to use as a guide when taking tours of ships since it contains the location of most of the items they will be looking for, and it also allows them to become familiar with fire control plans.

Pre-fire planning. Shipboard fires are among the most difficult of all fires to extinguish. They have the capability to tax the resources of entire regions. Realistic and effective pre-fire planning is crucial to deal successfully with such emergencies. Without pre-fire planning and drills, the wide variety of resources and specialists needed at a shipboard fire can rapidly turn a command post into chaos. IC's who are unfamiliar with the maritime industry need to know how to acquire and to utilize special help before an incident occurs. Pre-fire planning puts problems into perspective by defining the large picture at a time when it can be studied at leisure. All responders need to understand their role and responsibilities and the scope of their authority and jurisdiction.

Chapter 15 of NFPA 1405 is titled Problems Associated with Marine Firefighting. This chapter should be consulted in pre-planning. It covers Press and Media Relations; Hazardous Materials; Pollution Considerations; Language Barriers; and Vessel Movement.

Chapter 11 of NFPA 1405 is titled Communications. Pre-fire planning for shipboard fire-ground communication is a significant issue because of the unique aspects of a shipboard fire. The following questions regarding shipboard fire-ground communications should be given careful consideration when per-fire planning for a fire aboard ship:

- Has the possibility of firefighting units from various departments/agencies operating at the same incident been taken into account?
- Is there a common radio frequency on which to communicate?
- Are there established and recognized radio procedures and call signs that can be utilized by all agencies involved?
- Which existing shipboard communication systems can be utilized by fire suppression personnel to supplement radio communications?

- Have drills been conducted to identify the effectiveness/limitation of all types of communications systems that can be utilized?

Chapter 13 of NFPA 1405 is titled Incident Management System. This chapter provides information on the NIMS Incident Command System (ICS). Section 13.8 states that a planning section should be established near the Command Post to collect, evaluate, and disseminate tactical information on the incident. This is where the ship's blueprints, plans, and pre-fire surveys are used by technical specialists who prepare primary and secondary action plans. This section also maintains accurate records and documentation on resources and the chronological progression of the incident.

HISTORICAL CONSIDERATIONS

Vessel fires resulting in the total loss of the vessel, its cargo or significant loss of life continue to occur throughout the world. Past incidents in this country include the T/V PUERTO RICAN (explosion and fire aboard petroleum tanker off the approaches to San Francisco Bay in 1984). The T/V MEGA BORG fire (crude oil vessel fire in pump room and cargo compartments off the coast of Texas in 1990) resulting in the total loss of the vessel and cargo. The M/V PROTECTOR ALPHA (grain ship fire on the Columbia River in 1982 during which the vessel mooring lines were cut, setting the vessel adrift), and the P/V ECSTASY (Carnival Cruise Ship fire in the ship laundry occurring shortly after the vessel departed from Miami in 1998). Coast Guard Marine Casualty Investigation After Action Reports and/or National Transportation Safety Board (NTSB) Marine Accidents Reports provide an outstanding reference for operational lessons learned during a shipboard marine firefighting incident.

Historical Shipboard Marine Firefighting After Action major concerns have traditionally been:

- Vessel flooding due to excessive fire fighting water and limited/no dewatering ops;
- Vessel capsize/turtle and or sink due to excessive fire fighting water;
- Language barriers on foreign flag vessels;
- Fire fighters with limited to no shipboard familiarity;
- Fire fighters not familiar with shipboard terminology; and shipboard spaces;
- Shipboard spaces with limited accessibility and egress for fire fighters/gear;
- Responders unaware of vessel Fire Control Plan on board.

Note: Much of the above lessons learned were captured from the Freight Vessel CENTAURUS shipboard marine fire in the port of Wilmington, DE on 08 Feb 1989. The fire resulted in a total loss of the vessel. Maritime Administration (MARAD) Great Lakes Fire Training Center uses this incident as a case study during fire fighting training.

SHIPPING TRANSPORTATION PATTERNS

The Twin Ports (Duluth, Minnesota and Superior, Wisconsin) is the primary port within the COTP Duluth zone and the largest port on the Great Lakes serving large commercial Domestic, Canadian and Foreign Flag bulk freight vessels. Duluth-Superior is ranked 19th in the country for most tonnage shipped. During the 2014 shipping season, the Twin Ports moved 37,552,802 tons of cargo, and

36,701,017 in 2013. There were 901 freight vessel arrivals, of which 79 (9%) were foreign sea going freighters, 254 (28%) were Canadian Lakers and the remaining 568 (63%) were Domestic Lakers. The Principal cargoes are iron ore (40%), Coal (40%), Grain (5-10%) and others (5-10%). From 2004 through the 2010 shipping seasons, cruise ships such as the P/V C. COLUMBUS, P/V CLELIA II and the P/V YORKTOWN called to the port of Duluth and transited Western Lake Superior. The two entrances to Duluth – Superior Harbor, Duluth Entrance and Superior Entrance, are protected with breakwalls. The dredged channel within the harbor spans 8 miles inside the Lake Superior shoreline and extends nearly 3 miles upstream in the St. Louis River beneath two major highway bridges. All marine facilities are located within the harbor. Major port facilities include: two iron ore loading terminals, one coal loading terminal, ten bulk terminals, seven grain elevators, a large-capacity general cargo wharf and a major shipyard/repair facility. Other infrastructure includes: a bunkering facility (fuel depot), a few inactive ore docks, several marinas and passenger vessel moorings.

Lake Superior, Apostle Islands National Lakeshore. Protected harbors in small coastal villages and remote locations, suitable only for recreational boating and small commercial passenger vessels. The villages of Bayfield, Washburn, and Ashland have large marinas and public boat launches within their protected harbors. Within the Bayfield Harbor, the Madeline Island Ferry Service operates 3 car ferries as a vital transportation and freight service for Madeline Island residents. Ashland also has a power generation plant located on the shoreline that provides critical power to the region. Commercial vessel transit the area en route Western Lake Superior ports however, there are no significant commercial facilities for large freight vessels in this area with the exception of the C. Reis Coal Plant in Ashland, WI which offloads 1-3 ships per year.

Lake Superior, Keweenaw Waterway. Between the cities of Houghton and Hancock, the Portage Canal Lift Bridge spans the Keweenaw Waterway, serving as the only link between the mainland and the upper part of the Keweenaw Peninsula. There are no significant port facilities for large commercial vessels except for the Matilla Rock and Dock facility located in Hancock, MI. The former Smurfit Stone located in Ontonagon, MI., has been demolished and is out of business. Currently, Matilla Rock & Dock receives one or two salt shipments per year from self-unloading Lakers. Isle Royale National Park mainland Headquarters is located in Houghton, MI., and is the homeport of the passenger vessel RANGER III. The Coast Guard inspected passenger vessel M/V RANGER III seasonally transports park patrons and freight between IRNP and the NPS park headquarters in Houghton, MI. The M/V RANGER III typically makes 2 runs weekly between Houghton and Isle Royale. The M/V RANGER III is 165 ft, 34’ beam, 10.6 ft draft, 650 GT, with a capacity of 100 tons of cargo, 128 passengers and a minimum crew 6 when transporting cargo, and a minimum of 9 when transporting passengers.

Isle Royale National Park (IRNP). The National Park Service on Isle Royale operates several (5) small fueling facilities as well as a small marina. The Park Headquarters on Isle Royale is located on Mott Island and has a fueling facility. There is a marina, concessionaire and fueling facility located in Rock Harbor. There is a fueling facility at Winding in Washington Harbor and two small Ranger fueling stations for Ranger LE Patrol Boats at Malone Bay and Amygdaloid. The NPS operates a small gasoline tank vessel the T/V GREENSTONE II. This T/V transports gasoline to the island for park and concessionaire usage. In addition, the M/V RANGER III can transport 7500 gallons of diesel oil for

park and concessionaire usage. Small passenger vessels and recreational boaters operate seasonally from marinas and various locations around Houghton, Hancock, Eagle Harbor, and Copper Harbor and in and around the Keweenaw Peninsula in general.

Minnesota North Shore. Protected harbors suitable for large freighters are maintained in Two Harbors, Silver Bay, and Taconite Harbor. The only active commercial ports in this area of Western Lake Superior are iron ore (taconite) handling facilities located in Two Harbors and Silver Bay. Two Harbors ore dock includes a ship fueling facility (Great Lakes Fleet Fueling Facility). Taconite Harbor has a MTSA regulated facility that occasionally receives coal from self-unloading Lakers to fuel an active coal-fired power generation plant near the waterfront. Several inspected small passenger vessels operate seasonally from moorings in Grand Portage, Grand Marais and Beaver Bay. Several marinas throughout the area support seasonal tourism and recreational boating.

MUNICIPAL FIRE DEPARTMENTS

Local fire departments are responsible for fire protection within their jurisdictions. In some cities/towns this responsibility includes marine terminals and facilities. Some terminals/facilities may have in-house fire departments, most of which are in EPA FOSC jurisdiction but in close proximity to COTP/FOSC Duluth zone (i.e., Calumet Superior Refinery, Enbridge Energy, Plains Midstream Superior). In most cases the terminal fire departments have entered into mutual aid agreements with surrounding local fire department.

Upon arriving at the scene, the jurisdictional fire chief assumes charge of all aspects of the fire fighting operation. The vessel's master should contact the local fire chief and place himself and his crew at this disposal of the fire chief. At no time shall the vessel crew or other agencies or groups, either from shore side or waterside, engage in independent fire fighting activities beyond their capabilities or once the local fire department has taken command of the incident.

The jurisdictional fire chief's responsibilities shall include but not necessarily be limited to:

- Act as an Incident Commander (IC);
- Establish and staff a Command Post when acting as IC;
- Control of all fire fighting operations, both from the shore side and waterside;
- Establishment of a workable communication system with the units engaged in fire fighting operations, including: assisting vessels, police departments, civil defense and other agencies engaged in the overall operation;
- Formulation of a plan of action for the extinguishment of the fire and the safety of personnel and property;
- Procurement of needed firefighting equipment, material, and manpower (Mutual Aid Agreements, etc.);
- Direction of the activities of all personnel and equipment engaged in fire fighting;
- Procurement of the individual vessels fire fighting plan and stability data and information on that particular vessel;

- Requesting assistance from local police for traffic and crowd control;
- The evacuation of effected persons;
- Requesting assistance of local hospitals and doctors for medical requirements;
- Requesting ambulance service;
- Notification to USCG if not previously done.

U.S. COAST GUARD

Although the Coast Guard has no specific statutory responsibility to fight marine fires, it has traditionally been responsible for the saving of life and property upon the navigable waters of the United States. The COTP is charged by the Ports and Waterways Safety Act (33 USC 1221, et seq.) with the responsibility for navigation and vessel safety, safety of waterfront facilities and protection of the marine environment within his or her area of jurisdiction. These jurisdictional boundaries are precisely described in 33 CFR 3.45-45 and the FOSC Duluth boundaries defined in Section 1200 of this plan. This responsibility extends not only to ships, their cargo, and crew; but also to structures in, on, or immediately adjacent to the navigable waters of the United States, or the resources within such waters.

The COTP works with port authorities and local government within their area of jurisdiction to maintain current and effective contingency plans supported by the port community, including its fire department, to ensure coordination of federal, state, municipal, and commercial resources that respond to fires and other incidents. This policy is consistent with the Federal Fire Prevention and Control Act of 1974 (PL 93 498) that states that firefighting is, and should remain, a state and local function.

The Coast Guard considers marine firefighting to be a local responsibility, usually assumed by the local fire department. Where a local agency assumes responsibility as lead agency for a response to a fire and is capable of ensuring an adequate response, the Coast Guard will support this response as its resources allow, but will NOT assume responsibility for firefighting.

The Coast Guard firefighting policy is set forth in the Marine Safety Manual, Vol. VI, Chapter 8. A summary of this policy is as follows. Although the Coast Guard clearly has an interest in fighting fires involving vessels or waterfront facilities, local authorities are principally responsible for maintaining necessary fire fighting capabilities in U.S. ports and harbors. The involvement of Coast Guard forces in actual firefighting shall be to a degree commensurate with our personnel training and equipment levels. The Coast Guard intends to maintain its historic “assistance as available” posture without conveying the impression that we stand ready to relieve local jurisdictions of their responsibility. Additionally the response actions taken shall pose no unwarranted risk to Coast Guard personnel or equipment.

The Marine Safety Manual specifically addresses both Coast Guard and non Coast Guard supervised firefighting activities. “Generally, Coast Guard personnel shall not actively engage in firefighting except in support of a regular firefighting agency under the supervision of a qualified fire officer. Coast Guard personnel shall not engage in independent firefighting operations, except to save a life or in the early stages of a fire to avert a significant threat without undue risk.”

The Coast Guard's responsibility during a marine fire incident in the Port of Duluth – Superior is the coordination of and direction of USCG resources and to send a representative to the Command Post in an advisory role. In addition, the USCG is responsible to:

- Establish, coordinate and or participate in the establishment of a Unified Command;
- Assume IC for a burning vessel underway or at anchor when the fire department with jurisdiction is either not on scene or unable to respond, or no fire department has jurisdiction;
- Direct the anchoring, mooring, or movement of vessels;
- Establish safety/security zones;
- To restrict vessel operations in hazardous areas;
- Advise and provide technical data on ships construction, fire fighting systems, capabilities, stability, environmental considerations including the location of hazardous materials, and other aspects where the Coast Guard has special expertise;
- Provide information on involved waterfront facilities, including the location of hazardous materials and cargoes;
- Coordinate/direct the response/mitigation to actual or potential oil or hazardous substance discharges/release;
- Direct tugs to assist in relocating moored or anchored vessels;
- Alert owner/operators of terminals or vessels at risk;
- Assist in staffing the ICP to assist in fire fighting operations within capabilities as determined by the COTP;
- Coordinate marine fire fighting planning and assisting in training development;
- To take command or act as lead agency on incidents where jurisdictional questions arise or where mutually agreed to by the appropriate fire department representative and the COTP.

OWNER/OPERATORS OF VESSELS/WATERFRONT FACILITIES

Owner/Operators of Vessels and Waterfront Facilities are important sources of vessel and facility information. Regardless of other response resources the owner/operators of vessels and facilities retain a fundamental responsibility for safety and security. Per MSM Vol VI Chapter 8…The presence of local firefighters does not relieve the master of command of, or transfer the master's responsibility for overall safety on the vessel. However, the master should not normally countermand any order given by the local firefighters in the performance of firefighting activities onboard the vessel unless the action taken or planned clearly endangers the safety of the vessel or crew.

If it appears that the firefighting response will be shifted to a commercial firefighting/salvage company, it is essential that the IC/UC meet and confer with the salvage company representative. Such action will result in all parties understanding the situation aboard the stricken vessel at the time. The vessel owner will normally be the party that hires the firefighting/salvage company. Marine firefighting and salvage companies are listed in Section 4720 (Vessel Salvage and Lightering) of this plan. Terminal/Facility Managers are extremely valuable and can provide the IC/UC with data, schematics, and maps

concerning the facility layout, including terminal firefighting stations and equipment. This information will assist during firefighting and cleanup operations.

SALVAGE AND MARINE FIREFIGHTING RESOURCE PROVIDERS

Federal Salvage and Marine Firefighting regulations found in Title 33, Code of Federal Regulations, Part 155.4010, (Subpart I – Salvage and Marine Firefighting) established vessel response plan salvage and marine firefighting requirements for vessels, that are carrying group I-IV oils, and that are required by §§155.1015 and 155.5015 to have a vessel response plan (VRP). It is noted that salvage and marine firefighting actions can save lives and property, and prevent the escalation of potential oil spills to worst case discharge scenarios. As a result, a VRP holder must ensure by contract or other approved means that response resources are available to respond. However, the response criteria specified in the regulations (e.g., quantities of response resources and their arrival times) are planning criteria, not performance standards, and are based on assumptions that may not exist during an actual incident, as stated in 33 CFR 155.1010.

Compliance with the regulations is based upon whether a covered response plan ensures that adequate response resources are available, not on whether the actual performance of those response resources after an incident meets specified arrival times or other planning criteria. Failure to meet specified criteria during an actual spill response does not necessarily mean that the planning requirements of the Federal Water Pollution Control Act (FWPCA) (33 U.S.C. 1251-1376) and regulations were not met. The Coast Guard will exercise its enforcement discretion in light of all facts and circumstances.

In addition, §155.4030 requires the VRP to identify, in the geographical-specific appendices the salvage and marine firefighting services listed in Table 155.4030(b)—Salvage and Marine Firefighting Services and Response Timeframes. The VRP holder must list those resource providers that have been contracted to provide these services. The VRP may list multiple resource providers for each service, but must identify which one is the primary resource provider for each Captain of the Port (COTP) zone in which they operate. A method of contact, consistent with the requirements in §§155.1035(e)(6)(ii), 155.1040(e)(5)(ii), and 155.5035(e)(6)(ii) must also be listed, in the geographical-specific appendices of the VRP, adjacent to the name of the resource provider. Table 155.4030(b) lists the required salvage and marine firefighting services and response timeframes.

TABLE 155.4030(b)—SALVAGE AND MARINE FIREFIGHTING SERVICES AND RESPONSE TIMEFRAMES

Service		Location of incident response activity timeframe	
(1) Salvage		**CONUS: nearshore area; inland waters; Great Lakes; and OCONUS: <or = 12 miles from COTP city (hours)**	**CONUS: offshore area; and OCONUS: <or = 50 miles from COTP city (hours)**
(i) *Assessment & Survey:*			
(A) Remote assessment and consultation		**1**	**1**
(B) Begin assessment of structural stability		**3**	**3**
(C) On-site salvage assessment		**6**	**12**
(D) Assessment of structural stability		**12**	**18**
(E) Hull and bottom survey		**12**	**18**
(ii) *Stabilization:*			
(A) Emergency towing		**12**	**18**
(B) Salvage plan		**16**	**22**
(C) External emergency transfer operations		**18**	**24**
(D) Emergency lightering		**18**	**24**
(E) Other refloating methods		**18**	**24**
(F) Making temporary repairs		**18**	**24**
(G) Diving services support		**18**	**24**
(iii) *Specialized Salvage Operations:*			
(A) Special salvage operations plan		**18**	**24**
(B) Subsurface product removal		**72**	**84**
(C) Heavy lift[1]		**Estimated**	**Estimated**
(2) Marine firefighting	**At pier (hours)**	**CONUS: Nearshore area; inland waters; Great Lakes; and OCONUS: <or = 12 miles from COTP city (hours)**	**CONUS: Offshore area; and OCONUS: <or = 50 miles from COTP city (hours)**
(i) *Assessment & Planning:*			
(A) Remote assessment and consultation	**1**	**1**	**1**
(B) On-site fire assessment	**2**	**6**	**12**
(ii) *Fire Suppression:*			
(A) External firefighting teams	**4**	**8**	**12**
(B) External vessel firefighting systems	**4**	**12**	**18**

[1]Heavy lift services are not required to have definite hours for a response time. The plan holder must still contract for heavy lift services, provide a description of the heavy lift response and an estimated response time when these services are required, however, none of the timeframes listed in the table in §155.4030(b) will apply to these services.

(c) *Integration into the response organization.* You must ensure that all *salvage* and *marine firefighting resource providers* are integrated into the response organizations listed in your plans. The response organization must be consistent with the requirements set forth in §§155.1035(d), 155.1040(d), 155.1045(d), and 155.5035(d).

(d) *Coordination with other response resource providers, response organizations and OSROs.* Your plan must include provisions on how the salvage and marine firefighting resource providers will coordinate with other response resources, response organizations, and OSROs. For example, you will need to identify how salvage and marine firefighting assessment personnel will coordinate response activity with oil spill removal organizations. For services that, by law, require public assistance, there must be clear guidelines on how service providers will interact with those organizations. The information contained in the response plan must be consistent with applicable Area Contingency Plans (ACPs) and the National Oil and Hazardous Substances Pollution Contingency Plan as found in §§155.1030(h) and 155.5030(f).

(e) *Ensuring the proper emergency towing vessels are listed in your VRP.* Your VRP must identify towing vessels with the proper characteristics, horsepower, and bollard pull to tow your vessel(s). These towing vessels must be capable of operating in environments where the winds are up to 40 knots.

(f) *Ensuring the proper type and amount of transfer equipment is listed in your VRP.* Your salvage resource provider must be able to bring on scene a pumping capability that can offload the vessel's largest cargo or fuel tank, whichever is greater, in 24 hours of continuous operation. This is required for both emergency transfer and lightering operations.

(g) *Ensuring firefighting equipment is compatible with your vessel.* Your plan must list the proper type and amount of extinguishing agent needed to combat an oil fire involving your vessel's cargo fuel, other contents, and superstructure. If your primary extinguishing agent is foam or water, you must identify resources in your plan that are able to pump, for a minimum of 20 minutes, at least 0.016 gallons per minute per square foot of the deck area of your vessel, or an appropriate rate for spaces that this rate is not suitable for and if needed, an adequate source of foam. These resources described are to be supplied by the resource provider, external to the vessel's own firefighting system.

(h) *Ensuring the proper subsurface product removal.* You must have subsurface product removal capability if your vessel(s) operates in waters of 40 feet or more. Your resource provider must have the capability of removing bulk liquid cargo and fuel from your sunken vessel to a depth equal to the maximum your vessel operates in up to 150 feet.

Note: During the June 2015 Western Lake Superior PREP Area Spill Management Team Marine Firefighting TTX; Salvage and Marine Firefighting Companies in attendance stated that it is paramount that Vessel Owner/Operators activate their VRP and give them timely notification of a marine salvage and firefighting incident. They requested the COTP to ensure this occurs.

COORDINATION OF SPECIAL FORCES

Requests for federal resources and Special Forces should be submitted through the COTP. All resource and Special Forces made available will normally come under the direction and control of the COTP unless otherwise agreed upon by COTP and Fire Department IC. Examples of Federal Special Forces include the Coast Guard National Strike Force, Navy Supervisor of Salvage, U.S. EPA ERT, etc.,)

State and local agency resource and Special Forces made available during an incident will normally come under the direction and control of the Fire Department IC unless otherwise agreed upon by the Fire Department IC and the COTP.

Marine Chemist. The on-scene assistance of a Marine Chemist may be vital to assure the safety of response personnel. A Marine Chemist should be immediately indentified and available to conduct onboard atmospheric testing of spaces or tanks as may be necessary. A Marine Chemist tests the atmosphere of confined and poorly ventilated spaces for concentrations of oxygen and other gases which may be harmful, flammable, or explosive. During a marine fire, Marine Chemists can monitor conditions of an interior fire area and advise responders of chemical hazards that may be encountered. Marine Chemists are not in the immediate vicinity of Western Lake Superior and must be brought in. A listing of Marine Chemist contact information is located on page 5000- 17 of this plan and Section 4720 (Vessel Salvage and Lightering) of this plan.

Salvors. Salvors have a variety of unique skills which may be of use in a marine fire incident. Commercial Salvors operate a variety of specialized equipment to keep a vessel afloat or raise sunken vessels. Because many salvors deploy their assets within a large area of operation, local salvors may not be able to respond as quickly as a more remotely based company. The U.S Navy Supervisor of Salvage also maintains personnel and equipment which may be available. See Section 4720 (Vessel Salvage and Lightering) of this plan.

FIRE CONTROL PLAN

Commercial vessels 500 gross tons and above are required by international law to have a Fire Control Plan specific to the vessel. Shipboard Fire Control Plans are an invaluable resource during a shipboard fire, which should be utilized as soon as possible. A copy of this plan must be prominently displayed in a weather tight enclosure, located outside the deckhouse (both sides) for the assistance of shoreside firefighting personnel. It contains a set of general arrangement plans showing for each deck the fire control station, fire resistant and fire retardant bulkheads. It also contains particulars of the fire detection, manual alarm, fire extinguishing systems, fire doors, means of access to different compartments and ventilation systems including location of damper an fan controls.

PLAN REVIEW

This Marine Firefighting section is reviewed in accordance with ACP update requirements. It is revised when deemed necessary, reviewed annually and goes through a full revision triennially. This plan is available for review on the Coast Guard's Homeport website. Recommended revisions and comments may be made to the COTP at MSU Duluth.

2015 MARNE FIREFIGHTING TTX ASMT KEY DECISIONS

Note: On June 23, 2015 the Western Lake Superior Area Spill Management Team conducted a Marine Firefighting Tabletop Exercise (TTX) at the Radisson Hotel in Duluth, MN. Thirty-two members from Local Fire Departments, County Emergency Managers, State Pollution Response and Homeland Security Agencies, Shipping Industry, Lake Superior College, Oil Spill Removal Organization, Marine Firefighting & Salvage Companies, Fire Academy North Dakota, Coast Guard Marine Safety Unit Duluth and Coast Guard Cutter ALDER personnel attended the TTX. Information ascertained during the TTX is incorporated in this Marine Firefighting Section.

Key decisions made during the TTX for a major marine fire include:

- Duluth and Superior City Fire Departments would likely brief their Mayor's Office;
- State Response Agencies brief their Chain of Command, which would likely reach the Governor's Office;
- A Unified Command should be established over a single Incident Command;
- Unified Commanders should be comprised of the COTP, Vessel Owner Representative, Fire Chief(s) with jurisdiction, Salvage and Marine Firefighting Company Lead;
- The lead Unified Commander should be the COTP;
- The exact location of the ICP should be based on the specific location of the incident;
- Immediate information to ascertain from the vessel's master may include: any injuries, current conditions, actions taken, vessel status, cargo status, fuel onboard, what firefighting systems have been expended, and confirming that the vessel's Salvage and Marine Firefighting Resource Provider has been contacted (activated the VRP);
- CGC ALDER if in port or in the area could act as an offshore Command and Control, Safety Zone Enforcement, utilize SORS, and/or escort the affected vessel into port;
- Vessel with an onboard fire en route to the Twin Ports would likely be directed to an anchorage pending a full assessment. Offshore anchorages are recommended, however it was noted that an offshore anchorage is more likely to be impacted by weather/sea conditions;
- If allowed to proceed to the inner harbor, the recommendation is to use the Superior entrance to eliminate passing under the Duluth Aerial Lift Bridge and continue to one of the two inner harbor anchorages based on draft;

- Assist Tugs should be required if the vessel is coming into port or anchorage;
- The Local Fire Departments do not have jurisdiction off the dock or pier. They could support away from pier side or offshore firefighting mutual aid requests. Local Fire Departments stated that the County Sheriff is the local lead when offshore;
- Offshore vessel firefighting capabilities in the Twin Ports is extremely limited;
- The lead Fire Department is based on the location of the vessel or facility fire;
- The major marine salvage and firefighting companies would prefer to fight a fire on a moored vessel due to less logistical challenges and weather impacts;
- Grounding a vessel is considered an option over sinking or when necessary to prevent capsizing;
- The COTP will utilize Broadcast Notice to Mariners (BNTM) to notify other mariners of the vessel or waterfront facility fire. MSU Duluth will also email, fax and use phone trees to contact vessel owner/operators and agents;
- The Duluth, Minnesota and Superior, Wisconsin Fire Departments have mutual aid agreements with each other and can respond outside their respective states;
- Marine Firefighting and Salvage Company Resource Providers do not relieve local Fire Departments, instead they prefer to integrate into the existing response structure;
- For an offshore marine fire the Major Marine Salvage and Firefighting companies would likely be the lead in lieu of local Fire Departments;
- The Unified Command would consider moving a vessel on fire with assist tugs to prevent a larger incident. Major Marine Salvage and Firefighting companies have contracts in place with tug companies to provide this service with acceptance of any liabilities;
- Some local Fire Departments carry their flange which connects to the vessel's International Shore Connection;
- Major Marine Salvage and Firefighting companies have dewatering pumps or contracts to being them on scene. A technique called "Hot-Tapping" to remove water out of one watertight compartment to an adjacent compartment may be recommended;
- The Coast Guard Marine Safety Center Salvage Emergency Response Team (SERT) and Naval Architect expertise is critical to ensure vessel stability;
- The vessels Trim and Stability Book is important information required for the response which will aid the Coast Guard Marine Safety Center SERT and Naval Architects (Shipping Industry representatives stated they are available electronically);
- There is a sufficient amount of Marine Firefighting foam in the Twin Ports; Tank Vessel fires for example, would require much more foam due to the large volume of oil on board;
- Once the fire has been extinguished, a fire watch should be maintained for 24, 48, or 72 hours, which will be determined on an incident by incident basis.

LOGISTICS

See Section 5000 (Logistics) of this plan for additional ICS Logistic Section organization descriptions. In addition, information regarding Logistics can be found in Chapter 10 of the Coast Guard's 2014 Incident Management Handbook (IMH) and information regarding marine fire fighting ICS structure can be found in Chapter 22 of the Coast Guard 2014 IMH which is posted on Homeport.

COMMAND POSTS

To effectively combat a major fire, an ICP must be established as soon as possible. A command post provides several critical services. It is the field location at which the primary tactical-level, on-scene incident command functions are performed. A generally recognized, single site for command and control for the response. This reduces confusion among response personnel. Ready access to continuous communications between on-scene and off-scene personnel. See Section 2140 of this plan for a listing of potential ICP locations and additional information on Incident Command Posts.

For fires at a facility or on a vessel moored to a facility the ICP should be established as close to the incident as safety permits. Ideally the command post would be located in an office at the facility. The ICP should have the ability to accommodate multiple telephone lines. Provide a large open area to permit status board maintenance. Provide adequate lighting, heating, ventilation, etc.

For incidents involving vessels underway or at anchorage the ICP may be afloat. Potential afloat ICPs platforms may include:

- USCGC ALDER (WLB 216);
- Coast Guard Duluth Aids to Navigation 49ft BUSL;
- Local Tug boats;
- Coast Guard Station Portage 47 ft Utility Boat (Michigan UP).

The afloat ICP enhances the IC's ability to:

- Specifically direct response forces afloat and on the burning vessel;
- Enforcement of the safety zone;
- Assess status of the burning vessel and the effectiveness of tactical units;
- Control the timing of the deployment of shoreside staged personnel and equipment.

See Section 2140 of this plan for a list of potential ICPs in Western Lake Superior.

MARINE FIRE FIGHTING RESOURCES

U.S. COAST GUARD RESOURCES

Marine Safety Unit Duluth — (218) 725-3800; (218) 725-3850 (fax)

- Captain of the Port – coordinates CG response to marine fire fighting incident;
- Marine Inspectors with vessel stability information/expertise;
- Control of vessel movement, and crew cooperation with local fire department;
- FOSC Authority – Response Personnel;

USCG Station Duluth — (218) 529-3100; (218) 720-5412; (218) 529-3136 (fax)

- 45 Ft (RB-M), Search and Rescue (SAR)/LE platform;
- 25 Ft (RB-S), Search and Rescue (SAR)/LE platform;
- 24 Ft (SPC-SW) Special Purpose Craft, Search and Rescue (SAR)/LE platform;

USCG ANT Duluth — (218) 529-3114; (218) 529-3112 (fax)

- 49 Ft BUSL - ATON Boat Transport platform, Communications platform;
- 26 Ft TANB (ATON) platform;
- 20 Ft ABS – ATON Boat Small (ATON) platform;

USCGC ALDER (WLB 216) — (218) 529-3131; (218) 529-3135 (fax)

- 225 ft Juniper Class Cutter (13 ft draft);
- Fire fighting & SAR platform;
- De-watering pumps; SORS;
- Communications Center;

USCG Station Bayfield — (715) 779-5100; (715) 779-5810 (fax)

- 45 Ft (RB-M), Search and Rescue (SAR)/LE platform;
- 25 Ft RB-S Search and Rescue (SAR)/ LE platform;

USCG Station Portage — (906) 482-3253; (906) 482-1443 (fax)

- Two - 47 Ft Utility Boats, Search and Rescue (SAR)/ LE platform and Transport platform, Communications platform (on limited basis);
- 26 Ft TANB (ATON) platform;
- 25 Ft RB-S Search and Rescue (SAR)/ LE platform;

LOCAL RESOURCES

The two main fire departments in our AOR are the Duluth Fire Department and Superior Fire Department. Both of these departments have numerous resources available and can mobilize additional resources through mutual aid from the departments listed in the table below.

Duluth Fire Department	(911) or (218) 730-4400 or 730-4391
Superior Fire Department	(911) or (715) 394-0227

Fire Boat. Superior Fire Department has a 25 foot, jet propelled, flat bottom fire boat capable discharging 800-1000 gpm through the deluge gun and has a 2000-2200 gpm pumping capacity.

All Fire Departments in AOR

State	City/Town	County	Fire Dept #	Dispatch #
Minnesota				
	Baudette	Lake of the Woods	(218) 634-1143	(218) 634-1143
	Cloquet	Carlton	(218) 879-6514	(218) 834-3632
	Colvill	Cook	(218) 387-2931	(218) 387-3030
	Duluth	St. Louis	(218) 730-4400	(218) 727-8770
	Esko	Carlton	(218) 879-8825	(218) 834-3632
	Grand Marais	Cook	(218) 387-9092	(218) 387-3030
	Grand Portage	Cook	(218) 475-2401	(218) 387-3030
	Grand Rapids	Itasca	(218) 326-3477	(218) 326-3477
	Gunflint Trail #1 Hall	Cook	(218) 388-0313	(218) 388-3030
	Gunflint Trail #2	Cook	(218) 388-0314	(218) 388-3030

	Hall			
	Gunflint Trail #3	Cook	(218) 388-0319	(218) 388-3030
	Hermantown	St. Louis	(218) 729-1200	(218) 727-8770
	Hovland	Cook	(218) 475-2352	(218) 387-3030
	International Falls	Koochiching	(218) 283-2929	(218) 283-4416
	Lutsen	Cook	(218) 663-7445	(218) 387-3030
	Maple Hill Gun Trail Hall	Cook	(218) 387-9108	(218) 387-3030
	Maple Hill Devil Trk Hall	Cook	(218) 387-9109	(218) 387-3030
	Moorhead	Clay	(218) 299-5432	(701) 451 7660
	Schroeder	Cook	(218) 663-7559	(218) 387-3030
	Silver Bay	Lake	(218) 226-4423	(218) 834-0911
	Tofte	Cook	(218) 663-7619	(218) 387-3030
	Two Harbors	Lake	(218) 834-8816	(218) 834-0911
	Virginia	St. Louis	(218) 748-7521	(218) 749-6010
Wisconsin				
	Ashland	Ashland	(715) 682-7052	(715) 682-7025
	Bayfield	Bayfield	(715) 779-3333	(715) 373-6120
	Brule	Douglas	(715) 372-4886	(715) 394-4432
	Cornucopia*	Bayfield	(715) 742-3928	(715) 373-6120
	Herbster*	Bayfield	(715) 774-3829	(715) 373-6120
	Hurley	Iron	(715) 561-4715	(715) 561-3800
	Iron River*	Bayfield	(715) 372-4024	(715) 373-6120
	Odanah*	Ashland	(715) 682-7155	(715) 682-7025
	Port Wing*	Bayfield	(715) 774-3222	(715) 373-6120
	Red Cliff*	Bayfield	(715) 779-3700	(715) 373-6120
	Superior	Douglas	(715) 394-0227	N/A
	Washburn	Bayfield	(715) 373-6163	(715) 373-6120
*Towns/cities with an * are supported by Bayfield County Shore Rescue at (715) 774-3800				
Michigan				
	Baraga	Baraga	(906) 353-6260	(906) 524-6177
	Bessemer	Gogebic	(906) 667-0333	(906) 667-0203
	Big Bay	Marquette	(906) 345-9345	(906) 225-8485
	Calumet Village	Keweenaw	(906) 337-2211	(906) 337-2211
	Calumet Twp	Keweenaw	(906) 337-0801	(906) 337-0528
	Chassell	Houghton	(906) 523-4000	(906) 482-0055
	Copper Harbor	Keweenaw	(906) 289-4294	(906) 337-0528
	Eagle River	Keweenaw	(906) 337-2211	(906) 337-0528
	Hancock	Houghton	(906) 482-1118	(906) 482-0055
	Houghton	Houghton	(906) 482-0009	(906) 482-0055
	Ironwood	Gogebic	(906) 932-1234	(906) 667-0203

	Ironwood Twp	Gogebic	(906) 932-6012	(906) 667-0203
	L'Anse	Baraga	(906) 524-7355	(906) 524-6177
	Ontonagon	Ontonagon	(906) 884-2131	(906) 884-4901
	Skanee	Baraga	(906) 524-6161	(906) 524-6177
	Wakefield	Gogebic	(906) 224-4711	(906) 667-0203

LOCAL RESOURCES OF FIREFIGHTING FOAM

Lake Superior College Aircraft Firefighting School	(218) 733-7600
No longer has Marine Firefighting Foam; has:	(218) 733-1073
Structure Engine (1000 gal water)	
Crash Rescue Truck (1500 gal water, 300 gal foam, 150 lbs dry chemical)	
Contact Ms. Paula Castleman, Director of Emergency Response Training Center	

Air National Guard 148th Fighter Wing	(218) 788-7434
1200 gallons Class B	(218) 788-7442
Contact Fire Chief Dan Lyscher	

Enbridge Energy, Superior	(715) 394-1400
24 Hour Emergency Number	(800) 858-5253
1500 gallons	
Contact Mr. Trent Wetmore, Director of Superior Region	(715) 394-1493
Mr. Spencer Vassel, Emergency Response Coordinator	(715) 394-0715

Calumet Superior LLC., (former Murphy Oil Refinery)	(715) 398-3533
8,000 gallons	(715) 398-8204
Contact Mr. Kolin Schade, Refinery Plant Manager or;	
Mr. John O'Brien, Safety and Security Officer	

Duluth Fire Department	(218) 730-4400 or 730-4391
150 gallons A-FFF	(218) 730-4390; 4393
100 gallons Class A	
Contact Chief Bryan Bushey	

Superior Fire Department	(715) 394-0227
100 gallons Ar-FFF	
100 gallons Class A	

Contact Chief Steven Panger

Local/Regional Foam Supplier:

ANSUL Fire Protection Products	
Northland Fire & Safety	(888) 722-8812
2213 E 5th, Superior, WI	(715) 398-6643

Clarey's Safety Equipment, Inc	(507) 289-6749
3555 9th Street NW, Suite #200	(800) 624-5526
Rochester, MN 55901	(800) 558-8009

FINANCE

See Section 6000 (Finance and Admin) of this plan for additional ICS Finance and Administration organization descriptions. In addition, information regarding Finance/Admin Section can be found in Chapter 11 of the Coast Guard's 2014 Incident Management Handbook (IMH) and information regarding marine fire fighting ICS structure can be found in Chapter 22 of the Coast Guard Incident Management Handbook (IMH) of the which is posted on Homeport.

Funding of Fire Fighting Activities. In general, funding for Coast Guard fire fighting activities must come from Coast Guard Operating Expenses (OE) funds. Under some circumstances, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) Trust Fund, and the Oil Spill Liability Trust Fund (OSLTF) may be available to reimburse fire fighting expenses. This is limited only to those situations where the fire is fought specifically to abate the potential for, or fire resulting from, a pollution incident. Fire fighting activities related to the safety of life or property are generally not reimbursable from CERCLA or the OSLTF.

SAMPLE VESSEL FIRE CHECKLIST (NFPA 1405)

Incident Notification:

- Type of vessel incident: _____
- Location: _____
- Time of day: _____
- Weather: _____ temp _____ winds _____ mph _____direction
- Any other alarm information: _____
- Resources included in initial response: _____
- _____
- Start incident size-up process

- En-Route to Incident:
- Additional incident indicators (smoke showing, explosions, etc): _____

- Communications/radio informational updates
- Coast Guard and law enforcement response/information
- Consult pre-fire/plans (terminal, vessel, etc) and any applicable disaster plans (USCG, multi-agency, available resources, mass-casualty, etc).

- On the Scene
- Initial report on conditions (periodically update during incident)
- Incident location and scene conditions
- Vessel type and name: _____ _____
- Type and extent of emergency: _____
- Rescue situation: _____
- Exposures: _____
- Take Command – establish Incident Command System (ICS)
- Identify initial command post location
- Request additional assistance
- Additional alarms
- Activate pre-established response modes
- Specialized resources and equipment (fire boats, hazmat team, air units, etc.)
- Other organizations, agencies, and/or individuals
- Establish staging/base area, identify location, assign staging responsibility
- Perform immediate/obvious rescue of endangered persons
- Isolate area
- Determine operational area and define incident perimeter (be liberal)
- Shoreside-law enforcement (traffic and crowd control, initial evacuation, perimeter security)
- Waterside-Coast Guard, harbor police (vessel control, waterside rescue, waterside condition reports)
- Coast Guard and law enforcement officials to command post
- Perform initial actions to prevent incident from enlarging
- Protect/cool exposures
- Move endangered vessels, cargo, vehicles, etc.
- Secure/isolate cargo operations to vessel (i.e. liquid cargo/fuel transfer hoses)
- Investigate situation and gather additional information
- Type of incident (fire, explosion, hazardous material release, collision, etc.)

- Vessel Construction
- Obtain ship's fire control plan and other applicable plans
- Locate and account for ship's crew
- Consult with master, mates, engineering officer(s)
- Size, dimensions, decks, interior arrangement
- Age, condition, faults, weaknesses
- Compartmentation, fire/water tight separations/zones
- Vertical and horizontal openings and channels

- Exterior access and points of entry
- Access from dock (gangway, ramps, aerial ladders, cargo loading equipment)
- Condition of fuel, liquid cargo and ballast tanks
- Flooding and stability problems

- Collect Cargo Information
- Obtain dangerous cargo manifest, general cargo manifest, stowage plan (on or near bridge and/or terminal office)
- Determine susceptibility of cargo to heat and water
- Determine need for cargo salvage operations (offload or relocate vessel)
- Determine if hazardous materials are on board or involved (name, ID number, quantity, location, hazards)

- Determine Fire Situation
- Location (red hot metal, peeling paint, smoke, temperature readings, heat scanners)
- Interview crew (find out what happened, where, when why, what has been done prior to F.D. arrival and its effects)
- Type, size of area involved and extent of involvement (decks, holds, spaces, zones frames)
- Danger of extension and/or direction of fire spread
- Fire load, type and amount of materials involved
- Effect fire has had and projection of its continued effect
- Life hazard
- Crew (number, nationality, language barriers, location, condition)
- Shoreside workers and spectators (number, location, condition)
- Flooding and/or stability problems

- Exposure (Shoreside and Waterside)
- Exposure type (vessels, facilities, cargo, vehicles)
- Exposure access, arrangement, distance combustibility
- Pier, wharf, dock construction, configuration, condition, and combustibility
- Determine obstructions to operations, limitations, or apparatus movement and use
- Gather more detailed weather, tide, current, wind (direction, speed), temperature, precipitation, inversion, and fog information and anticipated changes and effects on incident

- Water Supply
- Hydrants (location, main size, capacity flow)
- Supplemental water sources (water tanks, portable pumps, drafting sites, fire boats and apparatus
- Vessel fire main system (condition, control valves)
- International shore connections
- Fire pump(s)
- Water Supply (con’t)
- Fire stations (locations, hose, type of couplings, associated equipment)
- Consider laying lines from shore to vessel, using aerial apparatus as standpipes

- Determine Status and Condition of, and Gain Control of other Vessel Systems
- Consult with engineering officers
- Dewatering systems, ballast, cargo and bilge pumps
- Generators (main, auxiliary, emergency)
- Ventilation systems, dampers, controls
- Communications systems (radios, telephones, voice tubes, public address)
- Fire protection systems, type (carbon dioxide, halon, foam, sprinklers), areas covered, control valve locations, method of operation
- Inert gas systems (on certain tank vessels)
- Smoke and fire detection systems
- Vessel propulsion systems (operational and capable moving vessel)
- Remotely controlled water tight fire doors
- Cargo handling gear

- Identify Incident Strategies, Objectives, Tactics and Tasks
- Develop plan(s) to achieve the above
- Mobilize resources to accomplish same (on scene, responding, available in reserve, response time to incident)
- Coast Guard resources
- Coast Guard Captain of the Port or his/her representative
- Coast Guard Sector Commander (vessels for waterside operations and floating command post)
- Coast Guard Atlantic/Pacific Strike Teams
- Helicopter overflights
- Coast Guard Vessel Traffic Service (VTS)
- Coast Guard Marine Investigators and Inspectors
- Fire boats (Coast Guard, municipal, military, private)
- Breathing apparatus filling equipment and cylinders
- Other law enforcement agencies (Coast Guard, Customs/Border Protection, Military, Fish and Game, Highway Patrol, etc.)
- Emergency medical services (hospitals, ambulances, medevac, field triage teams and equipment)
- Telephone and utility companies
- Port Authority(s)
- Coroner/medical examiner
- Military organizations
- Navy Supervisor of Salvage
- Oil spill response teams
- Damage control and fire fighting teams
- Dewatering equipment, foam concentrates and other supplies
- Helicopters and surface craft
- Demolition and ordinance experts
- Army Corps of Engineers

- Hazardous material cleanup cooperatives, contractors, vacuum trucks, and other containment equipment
- Identify Incident Strategies, Objectives, Tactics and Tasks (con't)
- Fire fighting foam concentrate (bulk suppliers, refinery and airport foam apparatus, and other specialized foam equipment)
- Bulk carbon dioxide
- Stevedores and specialized cargo handling equipment
- Cranes, tractors, forklifts
- Lighting equipment and generators
- Interpreters
- Communications equipment (portable radios, communication vehicles/trailers, field phones, messengers)
- Dewatering equipment (pumps, eductors, booms)
- Rehabilitation area (food, sleeping facilities, wash and sanitary facilities)
- Marine Salvage companies
- Ships' service companies
- Shipyard and drydock companies
- Welders
- Divers
- Marine Chemists
- Marine surveyors
- Pilots
- Representatives
- Vessel owner, agent
- Terminal operator
- Insurance
- News media, photographers
- Public works
- Establish interagency communications (loaner radios, communications officer)
- Establish other incident command system functions
- ICS Sections: Operations/Planning/Logistics
- ICS Command Staff: Safety/Information/Liaison/Intel
- Divide incident into manageable units, assign responsibility for those units, and identify unit objective (divisions, groups, branches)
- Identify and establish primary and secondary fire boundaries on all six sides of fire
- Hoselines cooling decks and bulkheads
- Move combustibles away from fire boundaries
- Secure ventilation and openings to fire area
- Secure utilities and fuel to fire area
- Investigate for concealed spaces and avenues of fire spread through boundaries
- Make frequent inspections of all side of fire
- Deploy floating booms around incident to contain debris and oil pollution
- Monitor vessel stability throughout incident

- Note changes in draft mark, inclinometers, etc.
- Beware of large accumulations of water above ship's waterline
- Secure openings in hull to prevent water entering vessel should a list occur
- Obtain technical assistance to determine stability situation and recommend corrective actions
- Begin adequate dewatering operations

- Fire Confinement and Control
- Mobilize and position sufficient personnel and hoselines/appliances/extinguishing agents to control and extinguish fire
- Coordinate ventilation of fire area with fire attack
- Provide for sufficient rotation of personnel to maintain a continuous extinguishing effort
- Beware of pressure buildup in secured spaces and maintain escape routes
- Begin necessary salvage operations
- When necessary, set fire watch and begin overhaul/fire cause
- Investigation operations
- Continually reevaluate incident operations and plans and make changes as necessary
- Document and record events as they occur with corresponding times

9000 ANNEXES

9100 ACP/GRSs

9200 HAZARDOUS SUBSTANCE ANNEX

9300 WMD/CBRNE ANNEX

9310 GREAT LAKES SMALL VESSEL RADIOLOGICAL/NUCLEAR DETECTION REGIONAL ANNEX

9400 SMFF ANNEX

See Section 8000

9500 AMS/TERRORISM ANNEX

9600 CANUSLAK ANNEX

9700 FISH AND WILDLIFE ANNEX

9800 EXTERNAL ANNEXES

9810 USCG D9INST – HAZWOPER

9820 USCG D9INST – RESPONSE TRAILER

9830 USCG D9INST – DRG/DRAT

9840 USCG D9INST – IMT