Western Lake Erie
Area Contingency Plan
Coastal/Inland

September 2005

Lucas, Ottawa, Erie, Sandusky, and Wood Counties, Ohio, and Monroe County, Michigan

Western Lake Erie Area Committee

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Western Lake Erie Area Contingency Plan

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1000 Introduction

This Area Contingency Plan (ACP) describes the strategy for a coordinated federal, state and local response to a discharge or substantial threat of discharge of oil, a release of a hazardous substance or a fire from a vessel, offshore facility, or onshore facility operating within the boundaries of the coastal and inland area of Western Lake Erie.

This plan addresses responses to:

- A most probable discharge
- A maximum most probable discharge
- A worst-case discharge including discharges from fire or explosion

Planning for these three scenarios covers the expected range of spills likely to occur in this area. The most probable discharge is the size of the average spill in the area based on the historical data available. The maximum most probable discharge is also based on historical spill data, but includes 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 worst-case discharge from a vessel or facility is the largest foreseeable discharge in adverse weather conditions.

This plan should be used in conjunction with the **Western Lake Erie Inland Sensitivity Atlas** (See Section **9520.2** of this plan). Additionally, the Coast Guard's **Incident Management Handbook (IMH)** outlines the Incident Command System organization and processes to be followed in executing the requirements of this plan. A copy of the IMH may be obtained by contacting the Government Printing Office at (202) 512-1800 or through the National Strike Force Coordination Center's web page http://www.uscg.mil/hq/nsfweb/index.html.

This plan shall also be used as a framework for evaluating other plans, including, vessel and facility response plans required by the Oil Pollution Act of 1990 (OPA 90). This plan is written to be consistent with National Oil and Hazardous Substances Contingency Plan (NCP); the Region 5 Regional Response Team's (RRT) Regional Oil and Hazardous Substances Contingency Plan (RCP) – ACP; and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

1100 Introduction/Authority

Section 4202 of the Oil Pollution Act of l990 (OPA 90) amended Subsection (j) of Section 311 of the Federal Water Pollution Control Act (FWPCA) 33 U.S.C. 1321 (j) to address the development of a National Planning and Response System. As part of this system, Area Committees are to be established for each area designated by the President. These Area Committees are to be comprised of qualified personnel from federal, state, and local agencies. Each Area Committee, under the direction of the predesignated Federal On-Scene Coordinator (FOSC) for the area, is responsible for developing an ACP which, when implemented in conjunction with the NCP, shall be adequate to remove a worst case discharge of oil or a hazardous substance, and to mitigate or prevent a substantial threat of such a discharge, from a vessel, offshore facility, or onshore facility operating in or near the geographic area. Each Area Committee is also responsible for working with state and local officials to pre-plan for joint response efforts, including appropriate procedures for mechanical recovery, dispersal, shoreline

cleanup, protection of sensitive environmental areas, and protection, rescue, and rehabilitation of fisheries and wildlife. The Area Committee is also required to work with state and local officials to expedite decisions for the use of dispersants and other mitigating substances and devices.

The functions of designating areas, appointing Area Committee members, determining the information to be included in ACPs, and reviewing and approving ACPs have been delegated by Executive Order 12777 of 22 October 1991, to the Commandant of the U. S. Coast Guard (USCG) through the Secretary of Transportation for the coastal zone, and to the Administrator of the U.S. Environmental Protection Agency (EPA) for the inland zone. The term "coastal zone" is defined in the current NCP (40 CFR 300.5) to mean all United States waters subject to the tide, United States waters of the Great Lakes, specified ports and harbors on inland rivers, and the waters of the Exclusive Economic Zone (EEZ). The Coast Guard has designated as areas, those portions of the Captain of the Port (COTP) zones that are within the coastal zone, for which Area Committees will prepare ACPs. The COTP zones are described in USCG regulations (33 CFR Part 3).

1200 Geographic Boundaries

The Marine Safety Unit (MSU) Toledo area of responsibility (AOR) includes all navigable waters of the United States and contiguous land areas within the following boundaries:

> **From latitude 42º N; longitude 84º30' W.; thence due south to latitude 41º N.; thence due east to longitude 82º25' W.; thence due north to the international boundary in Lake Erie; thence northwesterly along the international boundary to latitude 42º N.; thence due west to the starting point.**

In addition and in accordance with the RRT 5 RCP-ACP, the AOR extends up the following rivers:

- River Raisin (Monroe, MI): upstream to the turning basin (mile 1.5)
- Maumee River (Toledo, OH): upstream to the I-75 bridge
- Portage River (Port Clinton, OH): upstream to Hwy 163
- Sandusky Bay (Sandusky, OH): upstream to Hwy 2
- Huron River (Huron, OH): upstream to turning basin (mile .5)

In the event of a transboundary issue concerning an incident proximate to the international boundary, notification will be made through the Ninth District Command Center under the provisions of Annex I to the Canada-United States Joint Marine Pollution Contingency Plan (CANUSLAK).

Outside the coastal zone, the U.S. EPA has responsibility. The U.S. EPA Region 5 zone presently includes within the scope of this plan the counties of Monroe, Michigan and Lucas, Ottawa, Erie, Wood and Sandusky, Ohio.

1210 Economic Characteristics

The MSU Toledo area of responsibility (AOR) is quite diverse. It is made up of Lucas, Ottawa, Erie, Sandusky, and Wood counties in Ohio, and Monroe County, Michigan. The largest city within the AOR is the City of Toledo, Ohio, which is located in (and is the county seat of) Lucas County. Sitting at the western side of the AOR, Toledo covers an area of 84 square miles and borders on Lake Erie to the east and the State of Michigan to the north. Toledo is the fourth largest city in Ohio and the 57th largest city in the United States according to the 2000 census.

The City is well sited for transportation commerce, with convenient access to three of the country's most traveled interstate highways, I-80, I-90, and I-75. It also has one of the most active rail hubs in the United States and is a center for the trucking industry. The Toledo Express Airport offers commercial convenience and, while a smaller passenger airport, it ranks as the 15th busiest cargo airports in the nation. The Toledo-Lucas County Port authority provides cargo facilities for ships using the Port of Toledo at the mouth of the Maumee River and has been recognized as one of the Great Lakes' most diversified international cargo facilities. The Port of Toledo is also a Foreign-Trade Zone (FTZ). The Toledo-Lucas County Port Authority's Foreign-Trade Zone No. 8 is located at the Port of Toledo's 150-acre Overseas Cargo Center at the mouth of the Maumee River on Lake Erie. The Zone has a deep-draft dock with access to international markets through the Great Lakes/St. Lawrence Seaway System. Additionally, the site offers 360,000 square feet of warehouse space. In conjunction with the Toledo Express Airport FTZ, great flexibility is offered to business operations in this geographical area.

Commodities that are handled by the various terminals in the MSU Toledo AOR include, but are not limited to, agricultural products (alfalfa, canola, corn, fertilizers, oats, soybeans, sugar, wheat); petroleum products (coal, Pet Coke, asphalt; various grades of petroleum hydrocarbons #6 fuel oil to gasolines); various ores (sand, salt, stone, cement, iron ores); steel products; lumber; machinery; general cargoes.

The Port of Toledo also offers, in addition to a marine repair facility, two of the few available drydocks in the Great Lakes (800 x 100 and 554 x 100).

At the opposite side of the MSU Toledo AOR the emphasis is more on recreation and recreational boating, although there are several commercial interests as well. Nearly seven million people visit the City of Sandusky and Erie County, Ohio each year, solidifying its position as one of the most appealing vacation spots in the Midwest. Located on Lake Erie's southern shore, midway between Toledo and Cleveland, there are a variety of tourist venues for everyone – ranging from the Cedar Point Amusement Park to the Lake Erie Islands.

The Lake Erie Islands include a national monument, various Ohio State Parks, entertainment, shopping, camping, and recreational fishing and boating. They are served by ferry operations from Catawba Island, Port Clinton, and Sandusky.

Throughout the AOR, recreational fishing is a thriving enterprise. Due to perfect environmental factors, Lake Erie is the "Walleye Capitol of the World," with notable walleye fishing both in the winter and spring. Additionally, Lake Erie and the rivers that create the surrounding watershed support a variety of fish, including: yellow perch, small mouth bass, steelhead, salmon, and trout, for a very active recreational and commercial fishery.

1300 Area Committee

The USCG, U.S. EPA, Ohio EPA and Michigan Department of Environmental Quality (DEQ) OSCs, will co-chair the activities of the Area Committee and assist in the development of a comprehensive ACP that is consistent with the NCP.

The primary role of the Area Committee is to act as a preparedness and planning body. Area Committees are made up of experienced environmental response representatives from federal, state and local government agencies. Each member is empowered by their own agency to make decisions on behalf of their agency and to commit the agency to carrying out roles and responsibilities as described in the plan.

1310 Charter Members

The Co-chairs of the Area Committee provide overall direction and coordination of the planning effort. Other charter members are solicited and appointed by the Co-chairs.

Area Committee Members:

USCG FOSCR - MSU Toledo (Co-chair)	U.S. EPA Region 5 FOSC (Co-chair)
Ohio EPA OSC - NW District (Co-chair)	Michigan DEQ - SE District
Toledo Mutual Assistance Association (TMAA)	U.S. Army Corps Of Engineers (USACE), Buffalo District
National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC)	U.S. Occupational Safety and Health Administration (OSHA), Region 5
Ohio Emergency Management Agency (EMA)	Michigan State Police (MSP)
Ohio Department of Natural Resources (DNR)	Federal Emergency Management Agency (FEMA), Region 5
Lucas County EMA	Ottawa County EMA
Erie County EMA	Wood County EMA
Sandusky County EMA	Monroe County EMA
City of Toledo Fire Department	City of Oregon Fire Department
Toledo Environmental Services	U.S. Fish and Wildlife Service (FWS)
Various Industry representatives	

Sub-Committee On Sensitive Area Assessment:

Ohio DNR	Michigan DNR - SE District
NOAA SSC	CCGD9 Environmental Specialist

Sub-Committee On Unified Command System:

USCG - MSU Toledo	U.S. EPA Region 5
Ohio EPA - Northwest District	Michigan State Police
Toledo Environmental Services	City of Oregon Fire Department
City of Toledo Fire Department	TMAA
Lucas County Local Emergency Planning Committee (LEPC)	

Associate Members:

Toledo Metropolitan Area Council of Governments (TMACOG)	Toledo - Lucas County Port Authority
TMAA	Toledo State Wildlife
Great Lakes Spill Co-Op	Lake Carriers Association

Nature Center – Ohio Wildlife Rescue	Great Lakes Commission (GLC)
Marine Spill Response Corporation (MSRC)	

1320 Organization

The predesignated FOSCs and State OSCs for the area serve as Co-Chairs of the Area Committee. The Co-Chairs suggest Committee members, and provides general direction and guidance for the Committee. The two standing subcommittees are the Sensitive Area Assessment and Unified Command System. The Co-Chairs will consult with the RRT 5 to determine appropriate representatives from federal and state agencies. Members of subcommittees may be from governmental organizations, facility owners/operators, shipping company representatives, cleanup contractors, emergency response groups, consultants, and concerned citizens, who will assist with the Area Committee's development and maintenance. The Co-Chairs may convene ad-hoc temporary sub-committees as necessary to accomplish preparedness goals

1400 National Response System

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

1410 National Response Team

The NRT's membership consists of 16 federal agencies with responsibilities, interests, and expertise in various aspects of pollution emergency response. The U.S. EPA serves as Chairman and the USCG serves as Vice-Chair of the NRT, 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 national policy guidance prior to an incident and assistance as requested by an FOSC through the RRT. NRT assistance usually takes the form of technical advice, access to additional resources/equipment, or coordination with other RRTs. The NRT agency membership is provided below.

U.S. EPA – Chair	USCG – Vice-Chair
Department of Agriculture (DOA)	Department of Commerce (DOC)/NOAA
Department of Defense (DOD)	Department of Energy (DOE)
Department of Health and Human Services (HHS)	Department of the Interior (DOI)
Department of Justice (DOJ)	Department of Labor (DOL)
Department of State	Department of Transportation (DOT)
Federal Emergency Management Agency (FEMA)	General Services Administration (GSA)
Nuclear Regulatory Commission (NRC)	Department of the Treasury

1410.1 Spill of National Significance

The NRT can be particularly helpful during Spills of National Significance (SONS). A SONS is that rare, catastrophic spill event, which captures the nation's attention due to its actual damage or significant potential for adverse environmental impact. A SONS is defined as a spill which greatly exceeds the response capability of local and regional resources. An example of a SONS event was the T/V *Exxon Valdez* Oil Spill of 1989. Only the Commandant of the USCG or the Administrator of the U.S. EPA can declare a SONS. A SONS event often requires national resource support, which the NRT can help facilitate.

1420 Regional Response Team: The Next Tier

There are 13 RRTs, one for each of the 10 federal regions and one for Alaska, the Caribbean and the Pacific Basin. Each RRT has federal and state representation. Like the NRT, the RRTs do not directly respond to incidents. Their primary role is to develop the Regional Contingency Plan (RCP) and provide consultation and advice to the FOSC. These plans address region specific issues and provide guidance to OSCs for developing their area plans. The RRTs also provide one level of review for the ACP. The RRTs may be activated for specific incidents when requested by the FOSC. If the assistance requested by an FOSC exceeds an RRT's capability, the RRT may request assistance from the NRT. During an incident the RRT may either be alerted by telephone or convened in person. The cognizant RRT will also be consulted by the FOSC on the approval/disapproval of the use of In-situ burning or chemical countermeasures when that decision has not been pre-approved. In those instances where a possible public health emergency exists, the FOSC should notify the Health and Human Services (HHS) representative to the RRT. Throughout response actions, the FOSC may call upon the HHS representative for assistance in determining public health threats and call upon the Occupational Safety and Health Administration (OSHA) and HHS for advice on worker health and safety problems. The FOSC shall submit pollution reports to the RRT and other appropriate agencies as significant developments occur during response actions, through communications networks or procedures agreed to by the RRT and covered in the RCP.

1430 Area Committee Response Regime

The Area Committee response regime consists of federal and state OSCs and the multiple response agencies they work with. Local public safety agencies are ordinarily the first government representatives on scene at a spill. They are expected to initiate public safety and environmental protection measures that are consistent with the containment and cleanup requirements in the NCP. Ohio and Michigan both have environmental divisions responsible for responding to pollution incidents that may impact the air, waters, and lands within their state.

USCG MSU Toledo is the predesignated FOSCR of oil and chemical incidents in the Western Lake Erie **Coastal** Zone. The MSU responds to all oil spills in the coastal zone as the direct representative of the FOSC (Commander, Sector Detroit). These personnel will direct response efforts in close consultation with federal, state, and local officials, and the responsible party. In the event the incident exceeds state or local response capabilities, the FOSC may assume the role of Incident Commander (IC). If the incident is not an emergency, but requires long-term remediation, the role of FOSC will shift to the U.S. EPA as directed in the NCP.

U.S. EPA Region 5 is the predesignated FOSC of oil and chemical incidents in the Western Lake Erie **Inland** Zone. The U.S. EPA also performs remedial actions for releases originating from facilities and hazardous waste management facilities, regardless of their location.

1440 Command and Control: The Incident Command System

Most local agencies that respond to emergencies use the Incident Command System (ICS). Responses to pollution incidents under this plan will be done so using the **Unified Command System** (UCS). Unified Command is an element of ICS. They are identical with the exception of designation of the IC. In ICS, one individual, usually the first arriving fire company officer, assumes the role of IC. Due to the expansive scope of large oil spills, and the existence of agencies with multiple jurisdictions, a UCS is used. Here the federal and state OSC's, the local agency IC, and the Responsible Party's (RP) Incident Manager work together to resolve the incident.

1440.1 Incident Command System Summary

ICS provides a method for different agencies, organizations, and individuals to work together toward a common goal, in an organized, productive, efficient, and effective manner. It consists of procedures for controlling personnel, facilities, equipment, and communications during all phases of an incident. ICS is designed to evolve from the time an incident begins, through initial attack and stabilization, to long-term control, and finally, to the resolution of the incident. Both ICS and UCS are adaptable to any type of incident whether fire, explosion, hazardous materials release, or oil spill. Structure can be established and rapidly expanded depending on the 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 Command and Control systems the incident organization structure develops in a modular fashion, based upon 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. Smaller groups may manage small incidents while larger operations require multiple resources that must be organized efficiently to ensure solid command and control. An example of a Standard ICS Organization chart is provided below.

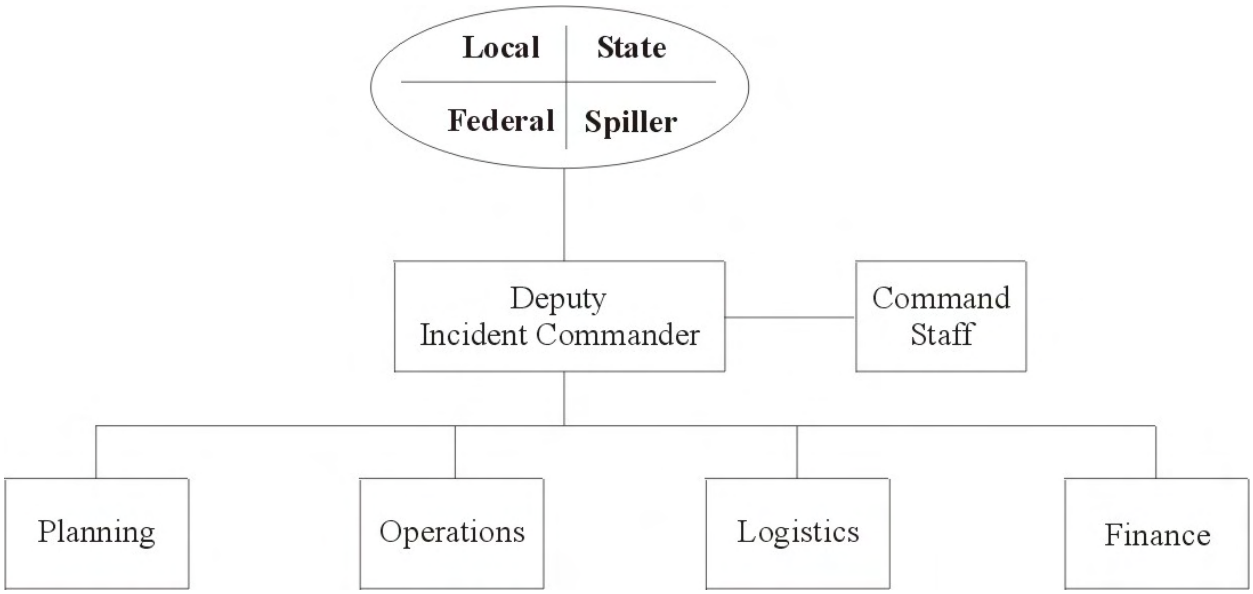

Figure 1400.1, Unified Command Structure

1450 FOSC Actions in Relation to the Responsible Party

After receiving initial notification of an oil or chemical incident in the MSU Toledo AOR and determination is made that cleanup actions are necessary, it is the responsibility of the FOSC to identify the RP. The FOSC will immediately inform the RP of the legal responsibility to initiate cleanup actions. The FOSC will issue to all suspected RPs a **Notice of Federal Interest (CG-5549)**. For vessels, the FOSC may also request a **surety bond/letter of undertaking** from the vessel's owner/operator and may withhold custom's clearance of suspected foreign vessels pending receipt.

If it becomes apparent that the RP's actions are inadequate, or the RP has not been identified, and no other agency is funding the cleanup, then the FOSC opens the Oil Spill Liability Trust Fund (OSTLF). The FOSC must ensure that the RP is issued a **Letter of Federal Assumption** in these cases.

In some cases, where the FOSC has established a Unified Command, the RP will be integrated into the ICS structure and will work alongside their federal, state, and/or local counterparts during all phases of cleanup activities. Refer to section **2110.1** for more detail.

1460 Relationship of the ACP to the Federal Radiological Emergency Response Plan

The objective of the Federal Radiological Emergency Response Plan (FRERP) is to establish an organized and integrated capability for timely, coordinated response by federal agencies to peacetime radiological emergencies. The FRERP is an interagency agreement which coordinates the response of various agencies under a variety of statutes. The FERP:

- Provides the Federal Government's concept of operations based on specific authorities for responding to radiological emergencies

- Outlines Federal policies and planning considerations on which the concept of operations of this Plan and federal agency specific response plans are based

- Specifies authorities and responsibilities of each Federal agency that may have a role in such emergencies

Federal agencies participating in the FRERP include:

DOA	DOC	DOD
DOE	HHS	DOI
DOJ	Department of State	Veterans Affairs (VA)
EPA	National Communication System	Housing and Urban Development (HUD)
FEMA	GSA	Nuclear Regulatory Commission (NRC)
DOT	National Aeronautics and Space Administration (NASA)	

The FRERP covers any peacetime radiological emergency that has actual, potential, or perceived radiological consequences within the United States, its Territories, possessions, or territorial waters and that could require a response by the Federal Government. The level of the federal response to a specific emergency will be based on the type and/or amount of radioactive material involved the location of the emergency, the impact on or the potential for impact on the public and environment, and the size of the affected area. Emergencies occurring at fixed nuclear facilities or during the transportation of radioactive materials, including nuclear weapons, fall within the scope of the FRERP regardless of whether the facility or radioactive materials are publicly or privately owned, federally regulated, regulated by an agreement state, or not regulated at all. Under the Atomic Energy Act of 1954 (Subsection 274.b.) the NRC has relinquished to certain states, its regulatory authority for licensing the use of source, byproduct, and small quantities of special nuclear material.

State and local government requests for assistance, as well as those from owners/operators of radiological facilities or activities, may be made directly to the federal agencies participating in the FRERP, FEMA, or to other federal agencies with which they have preexisting arrangements or relationships.

1470 Area Committee and Lessons Learned

It is the responsibility of the members of the Area Committee to ensure that “lessons learned” are captured, documented, and shared with all other members of the committee. This process should be done soon after an actual incident, or exercise to ensure that all the information is captured while it is still foremost in the participants’ memory. Members of the Area Committee should poll all members of their organization as soon as possible after the completion of an incident or exercise, such as through a “Hot Wash” process to be able to immediately capture the lessons learned. Documentation of the lessons learned should be gathered and presented at a Debrief session to be held at a place and time convenient to all members of the committee. The lessons learned that are captured should be constructive in nature, and of the type to allow the response organizations the opportunity to enhance the response posture of the entire Western Lake Erie Area Committee, and its’ organizations.

1480 Area Exercise Mechanism

Area exercises are divided into internal and external classification. The internal exercises are Notification Drills (quarterly), Spill Management Team Tabletop Exercises (annually), Equipment Deployment Exercises (annually), and Government Initiated Unannounced Exercises (maximum of 4 per area per year). The external exercises are Government-led exercises and Industry-led exercises. The FOSC is responsible for planning, designing, and executing the internal exercises. The National Strike Force Coordination Center (NSFCC) is responsible for scheduling the external exercises and the appropriate FOSC remains involved in the planning, design, and execution of the Government-led exercises. The FOSC will consult with other response organizations during exercise development and will participate as appropriate in the Industry-led exercises. Members of the Area Committee 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 or performing as a controller or evaluator of the exercise. Participation in the National Preparedness for Response and Exercise Program (PREP) and utilization of the PREP published guidance will ensure that all federal exercise requirements mandated by OPA 90 have been met. As part of their normal operations, representatives of the FOSC will be verifying that vessel and facility plan holders are conducting and recording required exercises.

1500 State/Local Response System

State of Michigan:
Oil spills into or on the waters of the State of Michigan are classified as "minor discharges," "medium discharges," and "major discharges" in accordance with the NCP. The classification level determines appropriate actions to be taken. While the Michigan DEQ recognizes that emergency responses may dictate extraordinary actions to protect human life or avert significant threats to public health, the Michigan DEQ shall consistently advise responders of the need to consider the impact of response activities on natural resources and the environment, particularly when public safety is not an issue. For small and medium spills, state and local government may provide the primary response. Local government may work directly with the state in responding to these incidents. The state determines the emergency measures to be taken. The Michigan DEQ's primary responsibility in responding to chemical emergencies is limited to environmental protection and determination of clean-up criteria. Only Michigan DEQ employees who have received the initial chemical hazard recognition course are allowed to respond to chemical situations, including petroleum spills. Michigan DEQ staff having received only the initial chemical hazard recognition training are to serve solely as technical consultants during sudden, non-routine, unknown or uncontrolled chemical situations. Certain chemical release situations may require more direct Michigan DEQ involvement than is possible through the limited technical consultant role. However, staff shall not directly manage the response and/or containment activity beyond the level for which they have been trained and equipped. If the RP is not immediately available and emergency clean up is necessary, Michigan DEQ staff may access appropriate response contractors. In all cases, Michigan DEQ staff shall coordinate their response with the Michigan State Police (MSP), local hazardous materials response teams, local fire departments, other agencies and private clean-up firms.

State of Ohio:
In Ohio, the local government is initially responsible for providing the protection for the people and property within their individual jurisdictions. The protection of people and

property from the effects of a hazardous materials incident, no matter whether it is small or large, is all encompassing. Government entities, through their response forces must protect people and property during pre-incident times (prior to the occurrence of an incident) by planning and mitigation activities; response times (during the incident) by actually responding and controlling the incident; and post-response times (after the incident is contained) through cleanup and restoration activities. All three phases described above require complete cooperation of local, state, federal and private agencies. If a hazardous materials incident occurs, the response forces at the local level (city and county) will make the initial response to control the situation. Many times however, large hazardous materials incidents are beyond the local entity capability (personnel and resources). During such times, assistance is needed from outside sources such as the state and possibly the federal government forces. Assistance provided by the state agencies can be in the form of personnel, equipment, advice (*i.e.*, recommended protective action guidelines and technical information) or any other available response actions. Should the incident prove to be beyond even local and state control, the state agencies may call upon and bring in their federal agency counterparts. Extreme emergencies may involve the full activation of the state Emergency Operations Center (EOC) with many state departments and agencies working in the EOC to resolve situations arising from a large-scale emergency or disaster, caused by a hazardous materials incident. The Governor's staff and department/agency directors or their chief deputies will work from the EOC in this stage until close out of the event or until the status can be down graded.

1510 County Emergency Management Systems

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. In particular the Toledo Fire Department has a well-equipped Hazmat Team that responds to incidents in Lucas, Wood, and Monroe Counties. Most county emergency management systems consist of a manager of the incident, an emergency management 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 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 IC works within this emergency management system in implementing this emergency management plan, relating standard operating procedures, and responding to the incident scene.

Erie County, Ohio:
The RP is required to provide notification of a release of an Extremely Hazardous Substance (EHS), hazardous substance, or oil or oil product above their respective reportable quantity if the release results in exposure beyond the facility boundary or into surface waters. The RP will contact the Ohio EMA's Response Division, the jurisdictional fire department, and the LEPC's Community Emergency Coordinator (CEC). The CEC shall be the Erie County EMA Director. The following information, as known, shall be relayed at the time of notification:

- Location of the release and facility
- Chemical name or identity and class
- Estimate of the quantity released

- Time and duration of the release
- Environmental medium the material was released into
- Known or anticipated health risks
- Precautions to take
- Name and number of individuals to contact for further information

The individual(s) receiving the initial call will utilize Erie County's Hazardous Material Plan, Tab 4, to document the spiller's notification. The jurisdictional fire department will then be notified and the CEC will verify they have been alerted. The local fire chief, or designate, will be the IC and will conduct an initial scene assessment and establish the Command Post (CP). An initial assessment of the situation will be made to determine the potential impact to the community and the environment. The IC will initially manage the CP. It will be identified by radio announcement and visual identification. The IC will assign a level o response to include recovery. All responding fire departments shall establish and operate under the ICS according to their department's standard operating procedures (SOPs).

The IC will coordinate with the RP for the use of private contractors to respond and assist with response and recovery actions. Situations beyond the control of the fire department and/or Erie County Hazmat Team shall be considered a defensive operation. No actions, other than evacuation and containment, will be performed until the resources and expertise become available to assist in the response. Notification of adjoining counties, as deemed appropriate, shall be made by the IC or through the EMA. Complete information about the spill as well as suspected effects upon their residents shall be relayed in a timely manner.

The local communications officer handles on-scene radio command at spill incidents. Radio traffic is relayed to the IC at the integrated CP. Non-fire radio frequencies *(i.e*., law, road, etc.) shall be coordinated through the EOC communications system. If the EOC communications system is not operating, non-fire frequencies will be placed at the CP. The EMA has the capabilities to also coordinate actions on all frequencies. Backup systems will be handled by the EOC by use of radio, cellular phone, and telephone to relay information to responding agencies.

All Erie County fire department personnel shall be trained to Operations Level. The Erie County Hazmat Team will be trained at the Technician Level. Emergency Medical Service (EMS) personnel shall be trained to the minimum of Awareness Level. All law enforcement personnel shall be trained to Awareness Level.

At the present time, the Erie County Health Department does not have the resources to facilitate on-scene air, water, or other environmental surveys. All samples must be sent to a reference laboratory for analysis. There are two hospitals in the county that can provide medical support during a chemical emergency: Firelands Community and Providence Hospitals. Both full service hospitals with designated decontamination areas, 24-hour emergency departments, full service laboratories, and other essential services. Both have established SOPs for handling contaminated victims.

Law Enforcement Agencies are responsible for providing for crowd and traffic control when necessary. They will assist with communications among other law enforcement agencies; evacuate citizens when requested to do so by the IC; and inform the EMA as soon as possible regarding the evacuation.

Reference: Erie County Chemical Emergency Response and Preparedness Plan.

Ottawa County, Ohio:
Facilities that have a release event will contact the Ottawa County Sheriff's Department at (419) 734-4404. The Sheriff's Department records all the information on the Ottawa County Incident Information Summary Form. The Sheriff's Department then notifies the Sheriff and EMA. Transportation incidents involving a release will be reported to the Sheriff's Department, Port Clinton Police Department, or the Oak Harbor Police Department. The dispatchers for these agencies will record all the information on the Incident Information Summary Form. The responding fire department will notify the EMA whenever a hazardous material or oil is involved in an incident. The EMA can be notified through the Sheriff's Dispatch. The Sheriff's Department will alert response organizations with the assistance of the EMA.

Ottawa County fire departments are responsible for handling initial response to hazardous material incidents in the area. Upon response to oil spills or Hazmat incidents, fire departments will endeavor to take actions deemed necessary to prevent or reduce environmental damage, and restore vital services. The primary duties of the fire departments are: protection of human life; control and confinement of the hazardous material release; and protection of property.

The fire department IC employs all available means to alleviate hazardous conditions. This includes:

- Identify the nature of the hazard
- Rescue any injured persons if necessary using proper protective equipment
- Determines the response level of incident
- Establish the hazardous area, staging areas and contamination reduction zone
- Designate evacuations zone, if appropriate
- Initiate public notifications, if appropriate
- Maintain overall command of the emergency scene until the hazard is contained or until command can be passed to an appropriate agency

In the event of an incident that is beyond the limits of local emergency response personnel mutual aid from outside the county is necessary. A hazardous materials response team can be called in from the Toledo Fire Department. Private contractors may also be used for scene containment and stabilization.

Radio communications will be the primary means of communication for the IC. All agencies responding to the scene should have the capability to communicate via radio. Two radio frequencies used in the county can be tied together through a crosspatch. The IC delegates the duties of coordinating communications to the communications officer. The IC or EMA Director may request that an individual from the EOC be placed on-scene to establish a communication link with the EOC. The EMA Director or the IC, as appropriate, will activate the EOC. The EOC will perform any activities that the IC or the EMA Director determines necessary. These actions include the gathering of resources, making public announcements, and coordinating response efforts. Agencies within the EOC may make protective action decisions for special populations.

The EMA Director is in charge of the operations at the EOC. Law Enforcement agencies are responsible for providing for crowd and traffic control when necessary. They will assist

with communications among other law enforcement agencies and evacuate citizens when requested to do so by the IC. Within Ottawa County H.B. Magruder Hospital in Port Clinton is capable of handling contaminated individuals.

Reference: The Ottawa County Plan for Response to Hazardous Materials Emergencies, Draft 1998 Revision.

Lucas County, Ohio:
There are 16 township, village, and city fire departments in Lucas County, including those in Toledo and Oregon, Ohio. The City of Toledo's HAZMAT unit, located near the center of the city, is responsible for handling initial response to hazardous material incidents in the area. Upon response to oil spills or HAZMAT incidents, local fire departments will endeavor to take actions deemed necessary to save lives, prevent or reduce environmental damage, and restore vital services. The primary duties of the fire departments are: life safety, confinement, and property conservation. Life safety: all reasonable actions necessary to save life and property will be weighed against the potential risk to fire department personnel. The Emergency Services will attempt feasible rescues, however the policy will be not to attempt to rescue the obviously dead, nor risk personnel to save property until this task can be accomplished in the safest manner. Confinement: Once risk to the safety of civilians and personnel are mitigated, steps should be taken to confine or contain the incident to the smallest possible area. Property conservation: Once steps have been taken to protect life and to confine the situation, consideration should move towards preserving property from the effects of the incident.

The fire department IC employs all available means to alleviate the hazardous condition. This includes:

- Assessment of visible activity
- Hazard identification and capability
- Assessment evaluating the effects of wind, topography, etc
- Determines the level of incident
- Evaluates the risks associated with the incident and sets up command posts
- Sets up ICS

Law enforcement agencies are responsible for providing for crowd and traffic control when necessary. They will assist with communications among other law enforcement agencies; coordinate with local and the County EOC as necessary; and assist in evacuation of the public, after coordination with the IC and the Red Cross. They coordinate all search efforts for missing persons. The IC will insure that such search efforts will not jeopardize an officer's safety.

Law enforcement agencies may choose to set up their command post after consultation with the IC on scene. The police CP shall be located in an area free from the possibility of contamination of officers and staff. It should be located near the incident CP, if possible. They ensure that the police CP is continually updated regarding incident reports received that may have a direct bearing on the incident.

Toledo Environmental Services (TES) is not a first responder for oil/hazardous materials incidents but coordinates local level clean up once the emergency has passed. The Hazardous Materials Unit of the Fire Division is the first responder for the City of Toledo

and through Mutual Aid to Sub-divisions. TES investigates cause and locates the source if not apparent. Their main area of responsibility is the City of Toledo, Rossford, and other parts of Lucas County. The Division's specific duties at the scene include:

- Assist in identifying potential hazardous conditions with available equipment (without entering the "hot zone")
- Assist in determining source, quality, and quantity of hazardous materials involved (without entering the "hot zone")
- Assist in collecting samples of air and water for further characterization (without entering the "hot zone")
- Determine if sanitary or storm sewers or waterways involvement exists
- Notify Ohio EPA, USCG, U.S. EPA, and Game Protector, when necessary
- Contact Water Reclamation and Sewer and Drainage Services, when necessary, to inform them of the nature and amount of materials that escaped to the sanitary sewer system
- Assist in determining methods of neutralizing or removing materials
- Assist the Fire Chief in coordinating actions with Water Reclamation and Sewer and Drainage Services personnel that are on location
- Notify the Water Division if there is a possibility of the incident affecting the Division
- Obtain necessary information to assess damages to any sewer system

Monroe County, Michigan:
In the event of a hazardous material release the RP is responsible for containment and cleanup according to state law. However, local government must often take measures as well. The local fire department with jurisdiction at the scene is responsible for initial response and incident command.

This fire department initially collects information and classifies the incident according to the Oil or Other Hazardous Material Incident Classification System. The classification level determines appropriate emergency actions to take. According to the Michigan Fire Prevention Act, (Act 207, P. A. 1941, as amended) the local fire chief and the Michigan State Police (MSP) jointly assess the incident and determine necessary actions. If the chief of the local fire department finds that a dangerous condition exists, the chief may take all necessary steps to protect persons and property.

In Monroe County a very limited capability exists to handle a hazardous material incident. An effort is being made to ensure that all firemen have training as required by OSHA Final Rule 29 CFR 1910.120. The Toledo, Ohio HAZMAT Team will respond in Monroe County when requested through Bedford Township Mutual Aid Agreement with Toledo, Ohio. Refer to the Monroe County and Area Fire Department Directory for a complete listing of fire personnel and equipment.

The fire department responds to the incident according to existing capabilities. Each fire department included in the Monroe County and Area Fire Department Directory has general operating procedures for responding to a hazardous material incident. In addition, site-specific standard operating procedures have been developed for sites with extremely hazardous substances to comply with the Superfund Amendments and Reauthorization Act (SARA) Title III. A list of resources for responding to incidents is found in the Monroe County Resource Manual. Outside assistance may be called upon as described above. Personnel from the MSP, Michigan DNR, Public Health and other state agencies may also provide advice and assistance, as well as personnel from the federal government. Each of these levels of government has legal responsibilities in responding to an incident.

SARA Title III requires that a community emergency coordinator be appointed who will recommend activation of the plan. The person appointed is the Emergency Management Coordinator. If the incident becomes a "community emergency" requiring action outside the immediate site, the fire department continues to maintain incident command at the immediate incident scene, while the Emergency Management Coordinator becomes a resource to the IC in implementing population protection measures and coordinating various community agencies.

Reference: Basic Plan, Appendix 4, to the Monroe County Emergency Management Plan.

Wood County, Ohio:
The senior fire official of a Wood County jurisdiction on scene will have the overall responsibility for direction and control at the scene of an oil or hazardous material spill. The jurisdictional fire department is in charge of establishing the CP. Since communications vary from jurisdiction to jurisdiction in Wood County, the IC will utilize the communication system of the first responding fire department. Primary responsibilities of all responding Wood County fire departments are the protection of human life and of limiting property damage.

Every fire department within Wood County has people trained to the Hazardous Materials Operations Level. The following departments have received specialized operations level training which enables them to contain/isolate petroleum distillate spills: Bloomdale, Bradner, Central Joint Fire District, Grand Rapids, Lake Township, North Baltimore, Northwood, Pemberville, Troy Township, Wayne, West Millgrove, and Weston. Perrysburg Township Fire Department is the only fire department in Wood County with entry-level capabilities. This department is included in a countywide mutual aid agreement with the Toledo Fire Department.

The ranking on-scene fire department officer will:

- Determine the magnitude of the incident
- Determine which public protective action to be employed
- Establish the hazardous area (hot, warm, and cold zones)
- Designate and evacuation zone, as appropriate
- Initiate public notification, as appropriate
- Request appropriate resources and support services
- Coordinate all emergency and support services
- Rescue any injured persons

- Maintain overall command of the emergency scene until the hazard is contained or until command is passed to the appropriate agency

The ranking Wood County law enforcement officer at the scene will report to the integrated on-scene CP and direct evacuation of citizens at the direction of the IC; cordon off the incident scene and exclude entry by unauthorized personnel; enforce traffic control; and maintain one radio equipped officer at the command post to relay information to the Communications Center. In addition, the following Wood County agencies may be activated to participate in the oil or hazardous materials response effort: EMA, Public Works Department, County Health Department, Water Department, Public Information Office, and the county chapter of the American Red Cross.

Reference: Wood County Emergency Operations Plan, March 1994.

Sandusky County, Ohio:
Sandusky County's fire departments are responsible for handling initial response to oil and hazardous material incidents in the area. Upon response to oil spills or hazardous materials incidents, local fire departments will endeavor to take actions deemed necessary to prevent or reduce environmental damage, and restore vital services. The primary duties of the fire departments are: the protection of human life; control and confinement of the hazardous material release; and protection of property.

The fire department IC employs all available means to alleviate the hazardous condition. This includes:

- Identify the nature of the hazard.
- Initiate appropriate actions to control the release of the hazardous material.
- Ensure the proper agencies are notified.
- Determines the response level of incident.
- Establish the hazardous area, staging areas and contamination reduction zone.
- Designate evacuations zone, if appropriate.
- Initiate public notifications, if appropriate.
- Rescue any injured persons.
- Maintain overall command of the emergency scene until the hazard is contained or until command can be passed to an appropriate agency.
- Provide law enforcement agencies with the appropriate protective clothing and breathing apparatus, if appropriate.

Law enforcement agencies are responsible for providing for crowd and traffic control when necessary. They will assist with communications among other law enforcement agencies, evacuate citizens when requested to do so by the IC. Information should be passed to the EMA as soon as possible regarding the evacuation.

1600 National Policy and Doctrine

All environmental responses are to be conducted under the guidance and within compliance of the following statutory guidance. Copies of these regulations are maintained by the FOSC and are available either on-line at http://www.epa.gov/fedrgstr and http://www.uscg.mil/hq/g-m/regs/archive.htm, or through the Government Printing Office, Washington, D.C. 20402.

National Response Plan:
The National Response Plan (NRP) is an all-hazard, all-discipline plan and is a specific application of the National Incident Management System (NIMS) for events considered "Incidents of National Significance" – those high-impact events that require an extensive and well-coordinated multiagency response to save lives, minimize damage, and provide the basis for long-term community and economic recovery. This includes credible threats or acts of terrorism and major disasters and emergencies under the Stafford Act.

The NRP provides a national capability for incident management, establishing multiagency coordinating structures at the field, regional, and headquarters levels that provide national resources to support on-scene incident management efforts and to address impacts to the rest of the country, including management of multiple incidents.

The NRP does not alter the statutory responsibilities of Federal departments and agencies. The NRP supersedes the Federal Response Plan, the U.S. Domestic Terrorism Concept of Operations Plan, and the Federal Radiological Emergency Response Plan. The NRP incorporates other national interagency plans (such as the National Search and Rescue Plan and the National Oil and Hazardous Substances Pollution Contingency Plan) as supporting plans or operational supplements.

See Appendix F for

Oil Pollution Act of 1990:

The Oil Pollution Act of 1990 **(**33 U.S.C. 2701-2761) amended the Clean Water Act and addressed the wide range of problems associated with preventing, responding to, and paying for oil pollution incidents in navigable waters of the United States. It created a comprehensive prevention, response, liability, and compensation regime to deal with vessel- and facility-caused oil pollution to U.S. navigable waters. OPA greatly increased Federal oversight of maritime oil transportation, while providing greater environmental safeguards by:

- Setting new requirements for vessel construction and crew licensing and manning,
- Mandating contingency planning,
- Enhancing federal response capability,
- Broadening enforcement authority,
- Increasing penalties,
- Creating new research and development programs,
- Increasing potential liabilities, and
- Significantly broadening financial responsibility requirements.

Title I of OPA established new and higher liability limits for oil spills, with commensurate changes to financial responsibility requirements. It substantially broadened the scope of damages, including natural resource damages (NRDs), for which polluters are liable. It also provided for the use of a $1 billion Oil Spill Liability Trust Fund (OSLTF) to pay for expeditious oil removal and uncompensated damages. The OSLTF is administered by the USCG National Pollution Funds Center.

Comprehensive Environmental Response, Compensation and Liability Act:
Requires the responsible party to report any release of a hazardous substance if the amount that is equal to or greater than the reportable quantity. It provides the FOSC funding for cleanup of hazardous waste sites and emergency response to a hazardous substance release. The USCG National Pollution Funds Center is the fiduciary manager of the portion of CERCLA allotted to the Coast Guard.

Clean Water Act:
Prohibits the discharge of oil and hazardous substances in harmful quantities into the navigable waterways of the United States. Under CWA vessels are required to have applicable marine sanitation devices (MSDs) and federal facilities are included under FWPCA.

1610 Public versus Private Resource Utilization

To be determined.

1620 Best Response Concept

Oil Spill Best Response: Delivering "Best Response":
The term "Best Response" means that a response organization will effectively, efficiently, and safely respond to oil spills, minimizing the consequences of pollution incidents and to protect our national environmental and economic interests. "Best Response" equals a successful response based on achievement of certain key success factors (*i.e.*, the things that a response must accomplish to be considered successful) as follows:

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

When conducting an oil spill response, ICs and their Command and General Staffs should always consider the "Best Response" concept while managing operational and support/coordination functions.

Operational Support and Coordination:

Search and Rescue	On-Water recovery
Public Information	Claims
Fire Fighting	Dispersants
Assisting and Cooperating Agencies	Natural Resource Damage Assessment Investigations
Salvage and Lightering	*In-situ* Burning Safety
Environmental Protection	Wildlife
Economic	Command Post Needs
Shoreline Recovery	
Political	

Disposal Hazardous Substance:
ICs and their Command and General Staffs need to closely monitor how well the incident objectives, strategies, and tactics are addressing "Best Response" and key response functions, and to make appropriate adjustments where necessary to ensure the maximum potential for success.

1630 Cleanup Assessment Protocol (How Clean is Clean)

The NCP (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 one incident to the next, 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 (LO) of the Incident Command Staff, or their respective Governor's office.

1640 Dispersant Pre-Approval/Monitoring/Decision Protocol (Decision Matrix)

The FOSC must choose the best method from the available response tools in any incident. The physical recovery and removal of oil is the preferred cleanup technique. Under certain conditions, however chemical agents can be effective.

MSU Toledo COTP is located in RRT 5. Currently there are no pre-approved uses of chemical agents in Region 5. The region does recognize, however that as a last resort, such agents may have some limited applicability. An example of a situation in which chemical use might be considered for reasons other than protection of human life is during migratory season, when significant migratory bird or endangered species populations are in danger of becoming oiled.

The FOSC may authorize or is authorized to use any chemical product without requesting permission if its use is necessary to prevent or substantially reduce a hazard to human life. The RRT should be notified as soon as practicable. In situations where a human hazard is not present, the FOSC must receive the concurrence of the following where practical before authorizing the use of a listed product:

- The RRT Co-Chairs
- The RRT representative(s) of the affected state(s)
- The DOI RRT member
- The DOC RRT member

The FOSC may consult with the NOAA SSC or U.S. EPA prior to chemical agent application in RRT Region 5. The NOAA and U.S. EPA SSC provide:

- Oil Spill modeling results
- Interpretation of ESI Maps
- Location of sensitive areas
- Chemical effects
- Environmental risks

The FOSC will request approval from the RRT 5 to use chemicals on behalf of the spiller. Use of chemicals on a Regional boundary should include the appropriate RRT members of the bordering region. The RRT shall be notified of any chemical use as soon as possible.

Whenever chemical dispersants are being considered the FOSC will use the Specialized Monitoring of Applied Response Technologies (SMART) protocol found at: http://response.restoration.noaa.gov/oilaids.html.

1650 *In-situ* Burn Approval/Monitoring/Decision Protocol (Decision Matrix)

In-situ burning for the purpose of this plan, is defined as the use of an ignition source to initiate the combustion of spilled oil that will burn due to it's intrinsic properties and does not include the adding of a burning agent to sustain the burn.

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

The FOSC should refer to Appendix VII of the RRT 5 RCP-ACP for the appropriate procedures for requesting approval of an *in-situ* burn request. Whenever In-Situ burning is being considered the FOSC will use the Specialized Monitoring of Applied Response Technologies (SMART) protocol found at: http://response.restoration.noaa.gov/oilaids.html.

1660 Bioremediation Approval/Monitoring/Decision Protocol (Decision Matrix)

To be determined.

1670 Fish and Wildlife Acts Compliance (Migatory Bird Act Marine Mammal Act)

The contamination of wildlife by oil has a high public impact that must be recognized by the FOSC and members of the RRT. Public interest, inquiries, criticism, and demands for the cleaning of affected wildlife can seriously hamper the FOSC's ability to proceed with mitigation of the spill. Early inspection of impacted or potentially impacted areas known to be wildlife habitat should be made by the FOSC, and at the first sign of wildlife involvement, the FOSC or U.S. EPA Remedial Project Manager (RPM) should contact the DOI representative to RRT 5 to request organization and supervision of the wildlife protection efforts. Funding for these efforts will be required either from an RP or the OSLTF.

During response to a discharge or release, natural resource trustees and managers may

provide technical assistance and expertise on potential effects on fish and wildlife and their habitats, or other sensitive environments that can be found in the affected area. They are familiar with the area or habitats affected and may be able to provide recommendations on the best locations for staging areas, access points, or anchorage. The natural resource trustees and managers may recommend specific habitats where protective measures should be taken and offer advice on response actions. They may assist in the development of a response monitoring plan and subsequent collection of data. Finally, the USFWS and the state wildlife agency can be expected to direct or provide oversight for the protection, rescue, and/or rehabilitation of fish and wildlife.

Additional Information on shelter in place can be found at the following web sites:

- http://www.fema.gov/library/hazmatf.htm
- http://www.fema.gov/pte/talkdiz/chemical.htm

Protective measures may include one or more of the following:

- Preventing oil from reaching areas where migratory birds and other wildlife are located by either containing or recovering the oil, or
- Deterring birds or other wildlife from entering areas affected by oil by using wildlife hazing devices or other methods.

If exposure of birds and other wildlife to oil cannot be prevented, an immediate decision will need to be made regarding whether to capture and rehabilitate oiled birds and other wildlife. DOI has statutory responsibilities for protecting migratory birds and federally listed threatened and endangered species. These responsibilities are delegated to the USFWS. If animals other than migratory birds or federally listed threatened or endangered species are found injured, the responsible agency is typically the state wildlife agency. The decision to rescue and rehabilitate oiled wildlife must be made in consultation with the applicable state and federal natural resource management agencies, since state and federal permits are required by law. Any wildlife rescue and rehabilitation will be directed or overseen by the USFWS.

Detailed information on procedures, permit requirements, and appropriate contacts is provided in Appendix IX, Fish and Wildlife Annex to the RRT 5 RCP-ACP.

Tri-State Bird Rescue and Research, Inc., of Wilmington, DE, and International Bird Research and Rehabilitation Center of Berkeley, CA, are the two nationally recognized centers that can assist in planned or emergency training and organization of wildlife conservation efforts. Several regional centers have experience with oiled wildlife. USFWS Regional Pollution Response Coordinators are sources of these and other contacts in the Region.

Additional information can be located in Appendix IX of the RRT 5 RCP-ACP.

1680 National Historic Preservation Act

Under this act, federal agencies must take into account possible effects of their actions on properties on or eligible for inclusion in the National Register of Historic Places. The term "historic property" is defined in the National Historic Preservation Act (NHPA) as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register." Although the NCP does not provide specific guidance for taking historic properties into account during an emergency response to an actual or threatened release, the FOSC shall ensure that historic properties protection strategies will be carried out. The FOSC will identify a responsible person for providing expertise on historic property matters to the FOSC during emergency response. Depending on the size and complexity of the incident, an FOSC historic properties technical advisory group convened by the specialist may be the most effective mechanism. The FOSC will be guided by the NHPA through procedures specified in 36 CFR Part 800, Protection of Historic Properties.

1690 Alternative Response Technology Evaluation System (ARTES)

During an oil or chemical spill the FOSC may be asked to consider using a non-conventional alternative countermeasure (a method, device, or product that hasn't typically been used for oil spill response). To assess whether a proposed countermeasure could be a useful response tool, it's necessary to quickly collect and evaluate the available information about it.

To aid in evaluating non-conventional alternative countermeasure in particular, the Alternative Response Tool Evaluation System (ARTES) was developed. Under ARTES an Alternative Response Tool Team (ARTT) rapidly evaluates a proposed response tool and provides feedback to the FOSC, in the form of a recommendation. The FOSC can then make an informed decision on the use of the proposed tool. During a spill only the FOSC, the Unified Command, the Planning Section Chief, or the Operations Section Chief can initiate an evaluation. They would do so in response to an identified need.

Completion of an ARTES evaluation does not mean that a product is pre-approved, recommended, licensed, certified, or authorized for use during an incident. ARTES forms are available as part of the NOAA Oil Spill Tool Box located online at:

- http://www.noaa.gov/oilaids/ARTES

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2000 Command

2100 Unified Command

The NCP 40 CFR 300 requires FOSCs to direct response efforts and coordinate all other actions at the scene of a spill or release. The NCP further states that the basic format for the response management system is a structure that brings together federal, state, local agencies, and the responsible party, to achieve an effective and efficient response. This is the UCS structure as shown in Figure 2000-1 below.

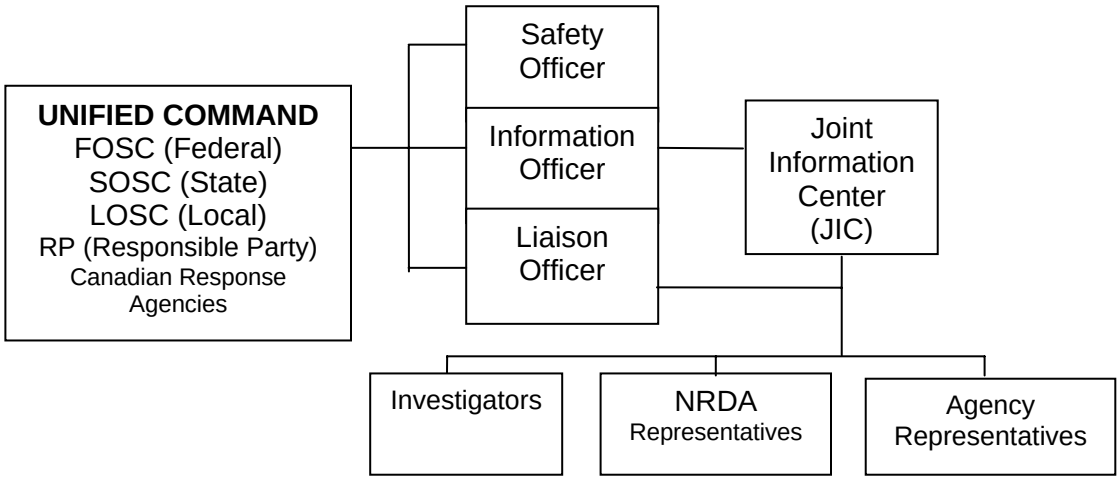


Figure 2000.1, Unified Command

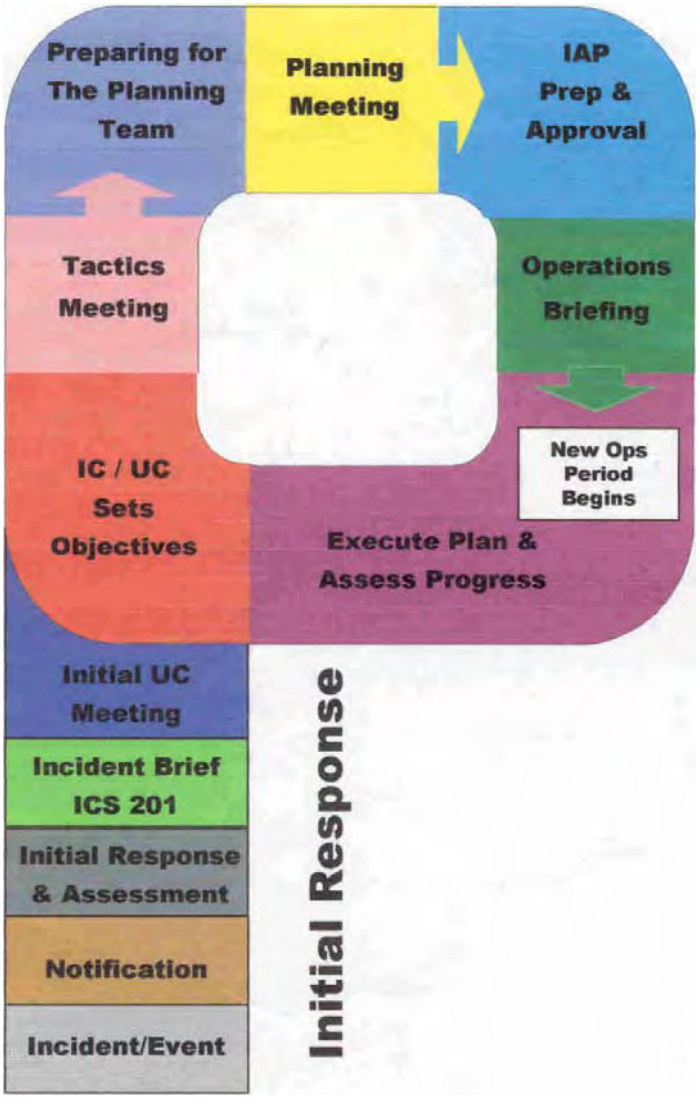
The Area Committee has adopted the ICS/UCS structure as the basic model for operating a coordinated response. Under UCS, federal, state, and local agencies and the responsible party will each provide a representative, who will consult with each other and share decision-making authority regarding spill response and cleanup management issues. Together, these individuals will jointly serve as the Unified Command. In doing this 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.

In reality an informal Unified Command organization has always existed for spills within the Western Lake Erie area. The FOSC, responsible party, fire department, local EMA, and the State OSC respond to the majority of minor incidents. These persons assemble on scene, determine the extent of the incident, quickly discuss options, and then initiate action. 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 during an incident; and a spirit of cooperation are key. In the rare event of serious disagreement between the “Unified Commanders” the RRT 5 can help to resolve any disagreements. It is envisioned that a major incident can be broken down into manageable geographical and/or functional levels that should not exceed the capabilities of the organization normally encountered during a smaller “routine” incident. The main objective for the Unified Command is to minimize the consequences of pollution incidents. Response goals, referred to as **Critical Success Factors** are noted below in Section 2100.1, Critical Success Factors. Under **Best Response** these are the things that must be done well, in order to conduct a successful response.

2100.1 Critical Success Factors

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

2100.2 Planning Cycle



The period of initial response and assessment occurs in all incidents. Short-term responses (small in scope and/or duration) can be coordinated using only ICS 201 briefings. Long-term, more complex responses will likely require a dedicated Planning Section Chief (PSC) who must arrange for transition into the **Operational Period Planning Cycle**. Certain meetings, briefings, and the gathering of information during the Cycle lead to the Incident Action Plan (IAP) that guides operations of the next operational period. The IC/UC specifies the operational periods (*i.e.*, 12 hour shifts, sunrise to sunset).

The Planning "P" represents the daily cycle of scheduled meetings and briefings. It is based upon a 12-hour operational period but can be modified by the Unified Command to meet the changing needs of a response. Further explanation of the planning cycle can be found in the USCG Incident Management Handbook which can be found on the National Strike Force Coordination Center (www.nsfcc.org) website.

2110 Command Representatives

2110.1 Incident Commander

A typical oil or hazardous substances incident may begin with the local Fire Chief or County Sheriff as the Incident Commander. As the responders from the various regulatory agencies arrive, these agencies will, whenever possible and practical, be organized under the UCS (as shown in Figure 2000-1), which includes, but not limited to:

- The pre-designated FOSC (USCG/U.S. EPA)
- The State OSC (Ohio EPA/Michigan DEQ)
- The representative of the RP
- The local IC, as appropriate

Initial Incident Commander Initial Checklist:

☐ Establish Incident Command Post (as required) ☐ Establish immediate priorities
First Priority is always safety: ☐ Perform Operational Risk Management (Appendix C) ☐ People involved in the incident ☐ Responders ☐ Other emergency workers ☐ Bystanders
Second Priority is incident stabilization: ☐ Ensure life safety ☐ Stay in command ☐ Manage resources efficiently ☐ Determine incident objectives, strategy and tactical direction. Incident objectives are based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Possible objectives are: ☐ Ensure the safety of citizens and response personnel ☐ Control the source of the spill ☐ Manage coordinated response effort ☐ Maximize protection of environmentally sensitive areas ☐ Contain and recover spilled material ☐ Recover and rehabilitate injured wildlife ☐ Remove oil from impacted areas ☐ Keep stakeholders informed of response activities ☐ Keep the public informed of response activities ☐ Prepare resource estimates and submit necessary resource requests ☐ Prepare additional IAPs for selected operational period subsequent to the initial 48-hour IAP until relieved or until incident operations are finished

Federal On-Scene Coordinator:

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

- The USCG designates FOSCs for removal actions in the coastal zones, except for hazardous substance releases which are of a chronic nature or which originate solely from a source under the jurisdiction of another federal agency. The USCG is not responsible for remedial action.

- The U.S. EPA designates FOSCs for removal actions in the inland zones, except for hazardous substance releases originating solely from a source under the jurisdiction of another federal agency. The EPA also designates Remedial Project Managers (RPMs) for remedial actions in both the inland and coastal zones, except for releases originating solely from a source under the jurisdiction of another federal agency.

- DOD and DOE provide FOSCs for hazardous substance releases from their sources and all other federal agencies provide FOSCs for non-hazardous substance releases from their sources.

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

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

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

- Notify and Coordinate with other Federal, State, and Local agencies
- Determine whether proper response actions have been initiated
- Collect information concerning the discharge or release and its source and cause
- The Identification of potentially responsible parties
- Determine nature, amount, location, direction, and time of discharge
- Identify pathways to human and environmental exposure
- Determine potential impact on human health, welfare, and safety, and the environment
- Determine possible impact on natural resources and property
- Identify priorities for protecting human health and welfare and the environment
- Estimate cost for the response
- Consult with RRT 5 members as needed for incident specific issues

State On-Scene Coordinator:

The highest-ranking representative for the States of Ohio and Michigan in the Unified Command response organization will perform the following duties:

- Determine and implement appropriate response strategies in consultation with other members of the Unified Command.
- Provide and coordinate state resources to the response effort as needed to accomplish combined cleanup objectives.

Local Incident 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. A major role of local organizations during all emergency incidents is to provide security for all on-scene forces and equipment.

Representative of the Responsible Party:

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 RRT 5 RCP-ACP, 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 RP for a vessel or facility, from which a hazardous substance is released, or which poses a substantial threat of a realese, 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 other responders according to law and the RP's own response plan.
- Cooperate with local public safety agencies during the phase of an incident in which public safety and property protection are paramount. 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 activities such as 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 local incident commander.
- As the priorities of an incident evolve, they often include off-site and environmental concerns. The RP has the lead role in responding to these concerns, under the oversight of state or federal agencies. Often there is a period in which "unified command" is practiced to address simultaneous public safety and environmental concerns.
- The RP will often contract with specialized Oil Spill Removal Organizations (OSROs) to perform the necessary investigations and cleanup of a spill. In these instances, the RP makes a proposal of the estimated scope and necessary actions to the appropriate state agency, for approval. After the investigation or cleanup has been approved, the facility or its contractors generally will carry out the identified necessary actions.
- The RP is responsible for Natural Resources Damage Assessments (NRDA) in

conjunction with the natural resources trustees.

- 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 conduct a critique of their response to an incident and revise prevention, preparedness, and response measures accordingly. The RP is liable for response costs, natural resource damages, and other damages caused by their spill.

2120 General Response Priorities

The first level of response will generally be the RP; followed by local agencies; and state agencies when local capabilities are exceeded. When incident response is beyond the capability of the state response, the FOSC is 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 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 agencies. In Michigan and Ohio, 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 the local fire or police commander for short-term, on-site, public safety-related issues. However, on some incidents, both state and federal OSCs may respond due to unique issues of the incident. A basic command structure that normally is established is shown in Figure 2120.1.

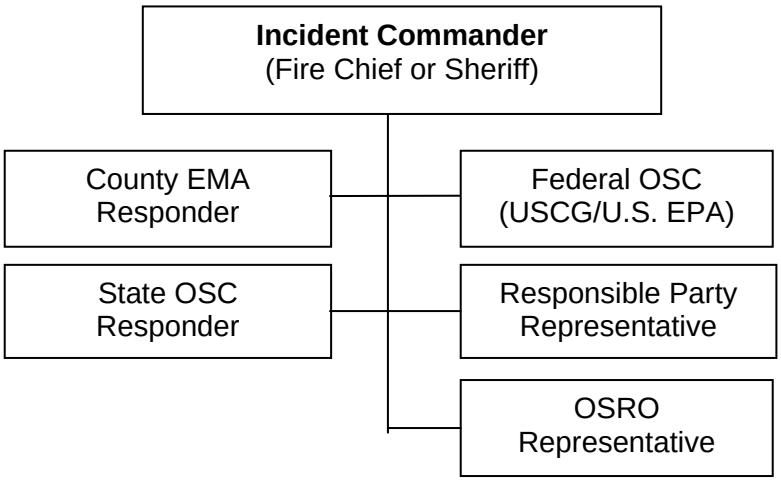


Figure 2120.1, Initial ICS Command Structure

As more information is collected and the response agencies commit more resources, a preliminary form of Unified Command structure should be established as early as possible. An example of an initial UCS is shown in Figure 2120.2. An example of what the USCG recommends in a large-scale incident when all the cells are activated can be found in the USCG Incident Management Handbook (April 2001).

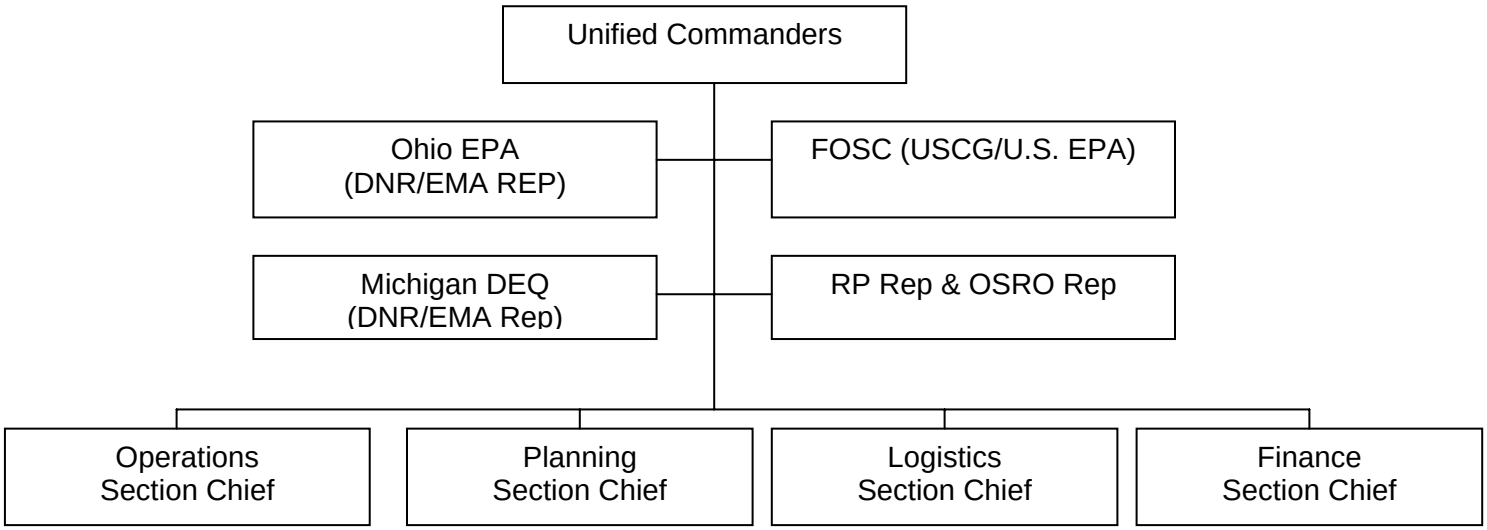


Figure 2120.2, Initial ICS Structure

2130 Command Post Locations

Command Post	Address	Phone/Fax
Monroe County EMA	965 S. Raisinville Road Monroe, Michigan 48161	Day: (734) 241-6400 Night: (734) 243-7070 Fax: (734) 241-7136
Lucas County EMA	2144 Monroe Street Toledo, Ohio 43624	Day: (419) 245-4934 Night: (419) 936-3550 Fax: (419) 241-7919
Ottawa County EMA	Ottawa Co. Courthouse 315 Madison Street Port Clinton, Ohio 43452	Day: (419) 734-6900 Night: (419) 734-4404 Fax: (419) 249-5054
Erie County EMA	2900 Columbus Avenue Sandusky, Ohio 44870	Day: (419) 627-7617 Night: (419) 627-7668 Fax: (419) 627-8108
Wood County EMA	#1 Courthouse Square Bowling Green, Ohio 43402	Day: (419) 354-9269 Night: (419) 373-1324 Fax: (419) 354-6382
Sandusky County EMA	EMA Command Center 2323 Countryside Drive Fremont, Ohio 43420	Day: (419) 334-8933 Night: (419) 332-2613 Fax: (419) 334-6427
USCG MSU Toledo	420 Madison Ave Suite 700 Toledo, Ohio 43604-1209	Day: (419) 418-6050 Night: (419) 418-6050 Fax: (419) 259-6374

2200 Safety Officer

The Safety Officer (SO) is the single individual responsible for developing and implementing the site-specific site safety and health plan and ensuring both responders and the public are safeguarded from incident hazards. The Safety Officer is a mandatory position under 29 CFR 1910.120. The Safety Officer may have a staff of Safety line Officers whose responsibility is to enforce the site safety plan and safeguard workers and the public. The safety officer reviews the incident medical plan and Incident Action Plan to ensure hazards are properly addressed. The safety Officer monitors the Operations Section to ensure tactics are employed in a safe manner.

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 SO.

Additional Information regarding this position can be found in the USCG Incident Management Handbook (April 2001).

Site Safety Plan Development:

At a minimum the plan should include health and safety hazard analysis for each site, task, or operation with a comprehensive operations work-plan. This should address personnel training requirements, personal protective equipment selection criteria and confined space entry procedures. In addition, it should detail an air monitoring plan, site control measures, and the format for pre-entry and pre-operations briefings.

- Site Safety Plan (Appendix B)
- Generic Hazard Information on transported oils and hazardous substances **Refer to Appendix 9310**
- OSHA training for volunteers **Refer to Appendix 5500**

2300 Information Officer

The information officer (IO) is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to other appropriate agencies and organizations. The IO will obtain information from technical experts to provide to the press and other interested parties.

In accordance with 40 CFR 300.414(n), the lead agency shall designate a spokesperson who shall inform the community of actions taken, respond to inquiries, and provide information concerning the response action. All news releases or statements made by participating agencies shall be jointly coordinated and funneled through the Information Office. The spokesperson shall notify, at a minimum, immediately affected citizens, local and state officials, and when appropriate, EMAs. FOSCs may consider use of the RRT to assist in media relations and other community involvement activities. Also, responsible parties may implement community involvement activities.

A schedule of the times and locations for press conferences should be published and made available to the media well in advance, whenever possible. This can be accomplished with a media advisory. It may be beneficial to conduct press conferences near the site of an incident. Public buildings in the area that could handle the expected media representatives should be quickly identified. This may include local federal facilities, fire stations, police stations or other state and local government buildings. One alternative is to conduct a conference or briefing on scene or from alongside a mobile command post. On-scene conferences or briefings must be carefully coordinate to ensure efforts to control the incident site are not disrupted. For press briefings, efforts should be made to find a location which provides convenient access for federal, state and local officials and which is large enough to accommodate the anticipated number of media personnel.

Members of the media may also approach personnel at an incident site. If possible, they should be referred to the IO. Agency representatives on scene may answer questions regarding their particular role. ***The rule of thumb is, if it's your job you can talk about it, if not, then refer them to whomever is responsible.*** Additional information regarding this position under ICS can be found in the USCG Incident Management handbook (April 2001).

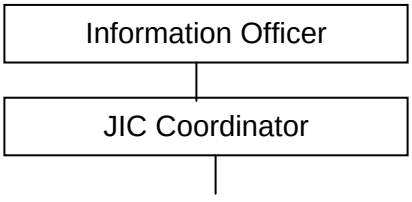
2310 Joint Information Center (JIC)

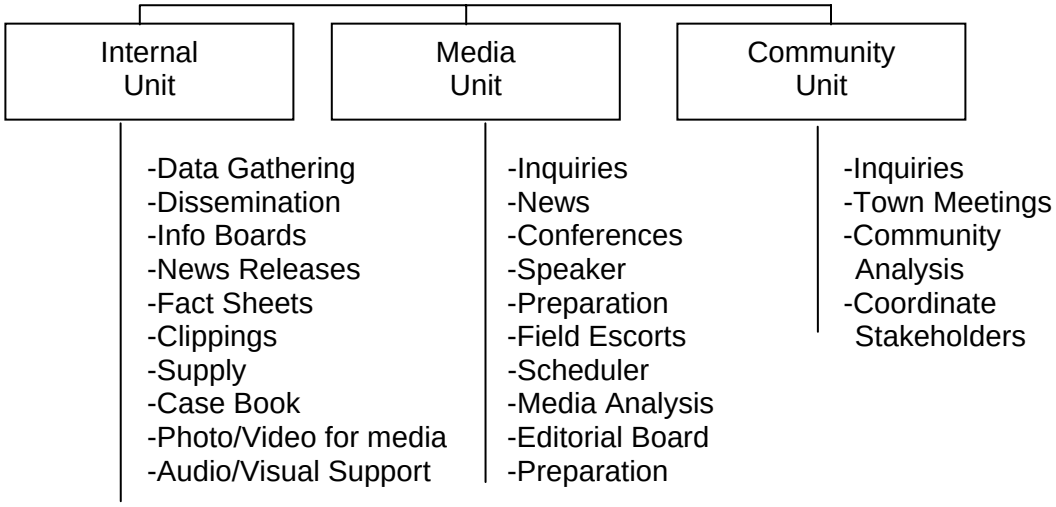
During a major oil spill, hazardous material release or marine disaster where media interest is high, the FOSC should establish a Joint Information Center (JIC) to coordinate the Public Affairs activities of participating agencies and parties. The JIC will be located separate from the Unified CP. It will be established to handle the joint public information needs of all groups participating in the response. Representatives from each of these agencies, groups, and companies may participate at this location. The role of the JIC includes:

- Providing multiple phone lines for incoming calls, manned by knowledgeable individuals
- Ensuring State and 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 responsible party 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 Unified Commanders. 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.

An Example of a Typical JIC Organization:





2320 Media Contacts

2320.1 Wire Services

Associated Press International	815 Superior Avenue Cleveland, OH 44114	Phone: (216) 771-2172 Fax: (216) 771-4218
Associated Press International	541 North Superior Toledo, OH 43604	Phone: (419) 255-7113 Fax: (419) 255-8848
Reuters	700 West St. Clair Ave Suite B-10 Cleveland, OH 44113	Phone: (216) 579-0077 Fax (216) 579-0730

2320.2 Newspapers

The Toledo Blade	541 North Superior Toledo, OH 43660	Phone: (419) 245-6000 Fax: (419) 245-6439
The Lima News	3515 Eldia Road Lima, OH	Phone: (419) 223-1010
The Community Mirror	113 West Wayne Street Maumee, OH 43537	Phone: (419) 893-8135
Perrysburg Messenger Journal	P.O. Box 267 Perrysburg, OH 43552	Phone: (419) 874-4491
Rossford Record	P. O. Box 145 Rossford, OH 43460	Phone: (419) 874-2528
News Herald	P. O. Box 550 Port Clinton, OH 43452	Phone: (419) 734-3141 Fax: (419) 734-4662
The Fremont News Messenger	P. O. Box 1230 Fremont, OH 43420	Phone: (419) 332-5511
Daily Chief Union	P.O. Box 180 Upper Sandusky, OH 43351	Phone: (419) 294-2331 Fax: (419) 294-5608
Sandusky Register	314 West Market Street Sandusky, OH 44870	Phone: (419) 625-5500 Fax: (419) 625-8160/3007
Monroe Evening News	P.O. Box 1176	Phone: (734) 243-6300

	Monroe, MI 48161	Fax: (734) 242-3175
Monroe Guardian	23 West First Street Monroe, MI 48161	Phone: (734) 243-2100 Fax: (734) 243-5196
Ottawa County Exponent	23 West First Street Monroe, MI 48161	Phone: (419) 898-5361
The Findlay Courier	P.O. Box 609 Findlay, OH 45840	Phone: (419) 422-5151 Fax: (419) 422-2937

2320.3 Television Stations

WTOL (CBS)	P. O. Box 715 Toledo, OH 43695	Phone: (419) 248-1100 (24-hr) Fax: (419) 244-7104
WTVG (NBC)	4247 Dorr Street Toledo, OH 43607	Phone: (419) 534-3858 (24-hr) Fax: (419) 534-3898
WNOW (ABC)	300 South Byrne Road Toledo, OH 43615	Phone: (419) 535-0024 Fax: (419) 535-0202
WUPW (Independent)	4 Seagate Suite 201 Toledo, OH 43604	Phone: (419) 244-3600 Fax: (419) 244-8892
WGTE (PBS)	P.O. Box 30 Toledo, OH 43697	Phone: (419) 243-3091 Fax: (419) 243-9711

2320.4 Radio Stations

WIOT (FM) WCMA (AM)	124 North Summit Street Toledo, OH 43604	Phone: (419) 244-8321 Fax: (419) 244-2483
WKKO (FM) WTOD (AM)	3225 Arlington Avenue Toledo, OH 43614	Phone: (419) 385-2536 Fax: (419) 385-2902
WSPD (AM) WLQR (FM)	125 South Superior St. Toledo, OH 43602	Phone: (419) 244-8321 Fax: (419) 244-7631
WVKS (FM)	4665 West Bancroft St. Toledo, OH 43615	Phone: (419) 531-1681 Fax: (419) 536-9271
WOTL (FM)	716 N. Westwood Ave. Toledo, OH 43607	Phone: (419) 537-1505 Fax: (419) 332-9341
WJCM (AM)	2130 Madison Ave. # 102N Toledo, OH 43613	Phone: (419) 243-7042 Fax: (419) 243-3032
WIMA/WIMI (AM)	667 West Market Street Lima, OH 45802	Phone: (419) 223-2060 Fax: (419) 229-3888
WNDH (FM)	709 N. Perry Street Napoleon, OH 43545	Phone: (419) 592-8060 Fax: (419) 592-1085
WONW (AM)	2110 Radio Drive Defiance, OH 43512	Phone: (419) 782-8126 Fax: (419) 784-4154
WFOB (AM/FM)	P. O. Drawer W Fostoria, OH 44830	Phone: (419) 435-5555 Fax: (419) 435-6611

2400 Liaison Officer

Incidents that are multi-jurisdictional or have several agencies involved may require the establishment of the Liaison Officer (LO) position on the Command Staff. The LO has

the following responsibilities:

- Serve as the initial point of contact for participating federal, state, and local agencies with a vested interest in the response
- 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
- Identify public and private concerns related to the status and effectiveness of the spill response

Additional information regarding this position can be found in the USCG Incident Management Handbook (April 2001).

2410 Natural Resource Damage Assessment Representatives (NRDA)

The NRDA representatives are responsible for coordinating the NRDA needs and activities of the trustee team. NRDA activities generally do not occur within the structure, processes, and control of the ICS. However, particularly in the early phases of a spill response, many NRDA activities overlap with environmental assessment performed for the sake of spill response. Because NRDA is carried out by natural resource trustee agencies and/or their contractors, personnel limitations may require staff to perform both NRDA and response activities simultaneously. Therefore, NRDA representatives should remain coordinated with the spill response organization through the LO, and may need to work directly with the Unified Command, Environmental Unit, Wildlife Branch or the NOAA SSC to resolve any problems or address areas of overlap. The NRDA Rep should:

- Attend appropriate planning meetings to facilitate communication between NRDA Team and ICS elements
- Identify site access, transportation support, logistics requirements and staffing needs to the proper ICS elements
- Interact with ICS elements to collect information essential to NRDA
- Coordinate sampling requirements with Sampling Specialists and the Situation Unit
- Coordinate with the Liaison Officer and the SSC to identify other organizations available to support NRDA activities
- Ensure that NRDA activities do not interfere or conflict with response objectives

2410.1 Notification Procedure for Initiating NRDA Actions

In the event of a spill, each agency is responsible for notifying its own members of the NRDA Team. Individual federal, state, and local agencies may be notified through various channels depending on the size and location of the spill. In all incidents that might require NRDA action, the DOI representative will attempt to notify representatives from each of the trustee agencies expected to participate in the NRDA process.

Current Department of Interior NRDA Coordinator:

Michael T. Chezik Regional Environmental Officer U.S. Department of the Interior Office of Environmental Policy and Compliance 244 Custom House 200 Chestnut Street Philadelphia, PA 19106	Phone: (215) 597-5378 or (800) 759-8352 Cell: (215) 266-5155 Fax: (215) 597-9845 E-mail: michael_chezik@os.doi.gov

2410.11 Introduction

The overall goal of the natural resource damage assessment (NRDA) process are to restore the injured natural resources to pre-spill conditions and to obtain compensation for all documented losses. This is a separate process from response. In general, this process may require several phases to complete, including the individual phases of documenting injuries, assessing damages, settling claims, and undertaking restoration programs. This plan addresses the NRDA process only during the initial stages while response efforts are underway. This plan describes the NRDA process, identifies the principle participants in NRDA activities, and clarifies the relationship of NRDA within the framework of the ICS. The information provided here is to allow an RP to understand the NRDA process. Additional information is provided concerning funding for NRDA activities and the requirements for specific federal, state, and local permits necessary to collect information for assessments of natural resource damages.

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

2410.12 Background and Structure

Significant oil spill incidents initially led to two primary actions:

- A response to contain and cleanup the spilled oil
- An assessment of the injuries to natural resources caused by the pollutant

In 1990, Congress enacted the Oil Pollution Act (OPA 90, 33 USC 2701, et seq.). OPA 90 authorizes resource trustees to seek compensation for injuries to natural resources caused by the discharge of oil. Trustees include:

- Department of Agriculture
- Department of Commerce
- Department of Defense
- Department of Energy
- Department of Interior
- State resource trustees (designated by the governor of each state)
- Federally recognized Indian tribes (designated by the governing body of any Indian tribe)
- Foreign trustees (designated by the head of any foreign government)

In Michigan, the DEQ and DNR share a role as trustee for Michigan resources. The lead state trustee generally is selected based upon the types of natural resources affected by the spill. In Ohio, the Ohio EPA and DNR share a role as trustee for Ohio resources. The lead state trustee generally is selected based upon the types of natural resources affected by the spill.

Representatives from each of the trustee agencies with affected resources shall coordinate damage assessments for natural resources. These trustee agencies typically work as a team to develop a single approach to the assessment process. The NRDA Team consults with members of government and interest groups from the affected area to address local concerns. Cooperative RP(s) may be invited to participate with the NRDA Team activities to develop one unified NRDA plan for public trust resources. A cooperative damage assessment could reduce costs by eliminating parallel assessments by the trustees and the RP. However, due to the statutory responsibilities, the trustees must maintain management and oversight of any cooperative damage assessment.

2410.13 Identification of Federal Lead Administrative Trustee

Executive Order 12777 (October 22, 1991) requires the federal natural resource trustees to select a representative as the Federal Lead Administrative Trustee (FLAT). In general, the FLAT serves as the federal contact for all aspects related to damage assessment, resource restoration, and federal funding for NRDA 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.

2410.14 Assessment Procedures

CERCLA directed the DOI to prepare rules for NRDA at hazardous waste sites and for emergency incidents involving CERCLA substances. OPA 90 assigned rulemaking responsibility for oil spills to U.S. navigable waters to the NOAA. There are some differences between OPA 90 and CERCLA rules, but for the purpose of interface with response, these differences are minor.

Pre-assessment is the only phase of NRDA likely to occur during emergency response. For oil spills, pre-assessment activities may be funded as initiation of NRDA either by the responsible party or from the OSLTF. In the latter case, monies are allocated to the trustees by the National Pollution Funds Center (NPFC) through the FLAT (40 CFR 300.305(e)). The assessment procedures set forth in the DOI rules are not mandatory, however, they must be used by trustees to obtain a rebuttable presumption that a specific assessment of damages is correct. The pre-assessment or initiation phase involves:

- Formal notification of trustees by the FOSC or RPM (U.S. EPA)
- Preliminary data collection and sampling primarily to preserve ephemeral information
- Determination of the likelihood of a successful damage claim—has an injury likely occurred, can it be tied to the incident, is there a viable responsible party, and will the cost of doing the assessment be less than the likely damages?

The CERCLA Assessment Plan and Assessment Implementation Phase and the Restoration Planning Phase of OPA mandate the following:

- Confirm exposures of trust resource(s) to released/discharge material
- Decide on the assessment procedures to be utilized: The DOI CERCLA rule includes both a simplified method, called **Type A assessments**, and protocols for conducting assessments in individual cases, called **Type B assessments**. The OPA rule does not identify specific assessment procedures for trustees to use; instead, procedures must meet 15 CFR 990.27(a)
- Assess injuries to trust resources and services by first determining whether injury has occurred as a result of the discharge or release and then quantifying the injury
- Determine appropriate restoration actions

Five steps are described in the DOI rules for determining and quantifying injury to resources and assessing monetary damages. The steps include:

- Conducting an initial assessment
- Conducting a pre-assessment screen
- Preparing an assessment plan
- Conducting the assessment following either the Type A or Type B rule
- Preparing a post-assessment report

NOAA has identified three phases to a damage assessment:

- Pre-assessment
- Restoration Planning
- Restoration Implementation

If injuries to natural resources or the services provided by natural resources are expected to continue following response actions, and feasible restoration alternatives exist to address those injuries, then trustees may proceed beyond the pre-assessment phase to Restoration Planning and Implementation.

2410.15 Injuries and Lost Services

Initial steps in the NRDA process require documentation of a pathway for the spilled oil, demonstration of oil exposure (direct and indirect) with specific resources along the pathway, and quantification of the injuries caused by the spilled oil. Natural resources and/or the services provided by such resources may be injured or disrupted through direct and indirect exposure to released substances.

The methods used to assess the injuries arise largely from scientific practices and best professional judgment. The DOI Rule and NOAA Rule provide guidance on specific types of biological injuries (e.g. death, physiological malfunctions such as decreased reproductive capacity) that may be used to claim damages. The scope of possible injuries extends beyond impacts to single organisms and may include effects on populations, habitats, and ecosystems.

“Services” include physical and biological functions provided by the natural resources to the ecosystem as well as other functions related to human use of the resources. Production of food, protection from predators, maintenance of community diversity, and provision of habitats are examples of some services provided to the ecosystem or its constituents. Examples of services provided to humans by natural resources include recreational opportunities such as fishing, wildlife viewing and beach activities. Other services provided by resources to humans are often less visible and can relate to the knowledge that a resource exists and is healthy or will continue to exist for the benefit of future generations.

2410.16 Preliminary Damage Assessment

Expected damages should be estimated as soon as possible to determine the potential scope of the case and the prudence of undertaking certain types of studies. Preliminary damage estimates should include:

- The reasonable costs of injury assessment
- The cost of restoring, rehabilitating, replacing or acquiring the equivalent of the injured resources
- The value of interim losses including both direct use (e.g. recreational) and passive use (*e.g.*, existence value) of resource pending restoration or natural recovery

2410.17 Cooperative NRDA

- Cooperation among federal, state and tribal trustees: The NCP provides for trustees to cooperate and coordinate their activities (40 CFR 615(a)). One method for trustee coordination found in the NCP is the FLAT, who is to facilitate communication during response operations between the FOSC and other natural resource trustees. The CERCLA and OPA 90 NRDA rules also encourage coordination among trustees.

- Cooperation between trustees and potential responsible parties: Trustees may conduct assessments cooperatively with the responsible parties. CERCLA Rule: Under 43 CFR 11.32(a)(2)(iii), trustees are required to notify all potentially responsible parties and invite their participation in development of the type and scope of the assessment and in the performance of the assessment. The OPA 90 Rule (15 CFR 990.15 (c)) is similar to the CERCLA rule.

2410.18 Public Involvement

Both CERCLA and OPA rules require opportunity for public review and comment on the draft restoration plan. The CERCLA rule also requires opportunity for public review and comment on the trustee's proposed injury assessment procedures.

2410.19 NRDA and ICS

ICS is an organizational framework designed to efficiently and effectively manage personnel and resources during emergency incidents. ICS is designed to be adaptable to any size event, and can be changed in structure to conform to the needs of the response. One objective of ICS is to reduce or eliminate the duplication of efforts by the numerous response agencies while attempting to control or contain the spill and mitigate possible impacts of the spilled oil. A small group consisting of the FOSC, state OSC, and a representative of the RP form the UC, and coordinates and direct the actions of the response.

Concerns of the 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 NRDA 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 the pollutant. This necessitates that NRDA activities be conducted simultaneously with response efforts and coordinated through the UC. Portions of the NRDA process should be integrated into the ICS to improve communication, expedite both response and NRDA activities, and make efficient use of personnel and equipment. To avoid potential conflicts in duties, it is recommended that members of the NRDA Team not have responsibilities for the spill cleanup or general response activities.

The primary role of the NRDA 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 NRDA Team, focuses primarily on response, cleanup, and minimizing

impacts of the oil spill. Although the UC and NRDA 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), communications, surveying spill sites, identification of protective measures and potential need for emergency restoration.

Uninterrupted communication between the UC and the NRDA Team is essential to ensure that needs and efforts of the NRDA 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 NRDA 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 NRDA activities. For this reason, the NRDA Team must remain separate from the UC 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 NRDA activities, however, are best coordinated through the UC. The NRDA Team will provide a representative(s) to the LO of the UC to present the needs of the NRDA Team and other response information to the incident command. The NRDA 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 under ICS and NRDA processes can be found in the USCG Incident Management Handbook (April 2001) and the National Pollution Funds Center User Reference Guide.

2420 Investigators

Investigators from federal, state, and local agencies will not formally be a part of the ICS. While investigation personnel may report to individuals who are part of the UC, the investigators should be separate so as not to introduce polarizing forces into the UCS. The initial point of contact may be the LO. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

2430 Agency Representatives

In many incidents involving multiple jurisdictions, an agency or jurisdiction will send a representative to assist in coordination efforts. An agency representative 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. Agency representatives report to the LO or to the UC in the absence of the LO. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

2440 U.S. Coast Guard FOSC Representative to Canada

Act as liaison between Unified Command in U.S. and Canada. Communicate and coordinate planned response actions between both Command Posts.

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3000 Operations

3100 Operations Section Organization

The Operations Section is responsible for the implementation of the Incident Action Plan and achievement of cleanup objectives determined by the Unified Command. This section is responsible for employing detailed operational tactics with operations section representatives from the federal, state and responsible party organizations.

Operational Risk Management – Prior to deploying resources on scene, response organizations shall perform a risk assessment. For Coast Guard led responses, an Operational Risk Management approach will be used to ensure a reasonable effort has been made to identify hazards to responders (see appendix C).

The following is an organizational chart of the Operations Section and its subordinate units. 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 Coast Guard Incident Management Handbook.

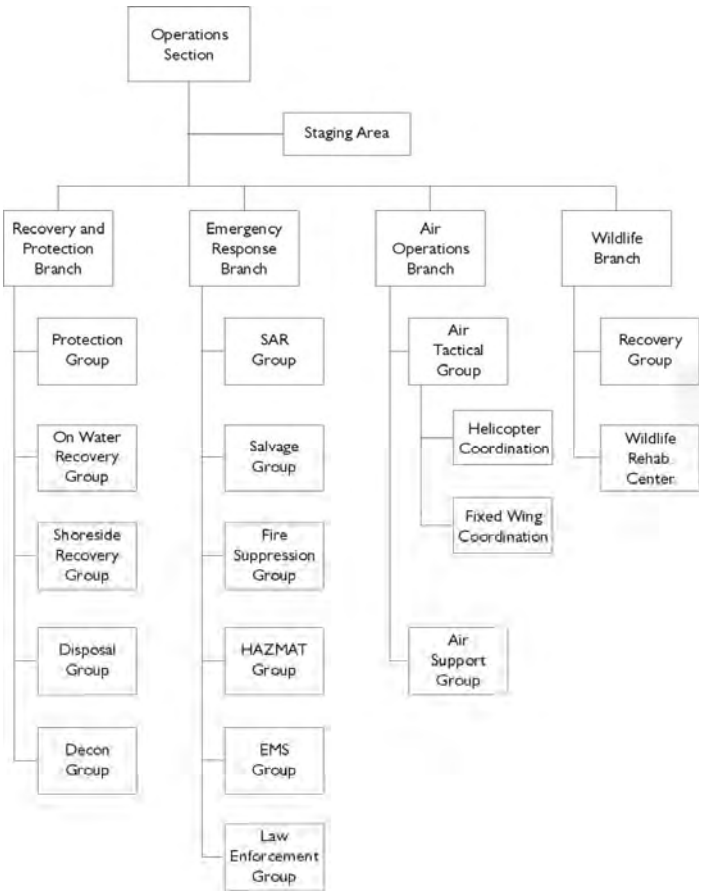

Figure 3100.1, Operations Section

3110 Operations Section Chief

The Operations Section Chief supervises the Operations Section. This section is responsible for the implementation of the Incident Action Plan and achievement of cleanup objectives determined by the Unified Command.

3200 Recovery and Protection

Reference: "Environmental Protection in Spill Response Planning: A Guide Book"

3210 Protection Group

The Protection Group will determine the proper deployment of containment, diversion, and sorbent boom in designated locations and implement proper cleanup methods using the following guidelines:

- Ensure air monitoring, product identification, sampling and site characterization is perfromed prior to initiating operations to ensure responders and the public are **properly** safeguarded from toxic inhalation or absorption hazards.

- Ensure cleanup methods are appropriate for area being cleaned.

- Do not conduct cleanup with methods that cause more damage than the oil if left alone.

- Ensure workers know what to look out for, avoid, or protect.

- If dispersants, burning, or the use of other chemicals is a viable option, seek approval and plan logistics early.

Each incident is different and may require extensive review 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: MSU Toledo Port Operations Library References, SSC, Atlantic Strike Team, and Manufacturer and/or users of the chemical involved. MSU Toledo has developed specific protection strategies for a number of environmentally sensitive areas in the Western Lake Erie coastal zone. Some of this information is included in Section 4400 of this plan and additional information is maintained at MSU Toledo's offices. In addition, a geographic information system (GIS)-based effort is maintained through U.S. EPA for the entire scope of the plan area and includes geo-referenced data for environmentally sensitive areas, potential spill sources, water intakes, marinas, launching ramps, locks and dams.

This information is made available for planners and responders through hard copy atlases, CD-ROM, and web-based on-line files. Contact MSU Toledo for details.

3210 .1 Containment and Protection Options

River Environment Protection Strategies:

Current is the largest factor affecting boom deployment in river environments. The containment ability of booms can be ineffective in as little as 1 knot of current. The most effective use of booms in the river is to cascade sections no longer than 250' at small angles to the current in an attempt to allow the oil to flow along the boom towards natural shoreline recovery areas. For river operations the Coast Guard Research and Developments Fast Water Response Guide shall be consulted. The guide is found at the following website: http://www.rdc.uscg.gov/.

The booming priorities for **Major or Larger Medium** spills are generally:

(1) Boom around vessel/source if flow cannot be stopped

(2) Cascade boom to collection points ashore

(3) Boom in pockets for shoreline recovery

In **Minor or Smaller Medium** spills the booming priorities are:

(1) Boom around vessel/source if flow cannot be stopped

(2) Boom in pockets for shoreline recovery

Harbor/Bay Environment Protection Strategies:

Spills in harbor or bay areas are similar to those on the open lake except that the areas that can be affected are smaller. These areas are still large enough, however, to limit booming of much of the shoreline. Wind driven currents are the primary force moving oil on these waters. The response strategy for harbor or bay environments is to quickly determine wind direction, project the path of the oil, deploy deflection boom across sensitive areas, and cascade boom for shoreline recovery. Generally in Major Spills the booming priorities are:

(1) Boom around vessel/source if flow cannot be stopped

(2) Deploy deflection boom across sensitive areas or cascade boom to collection points ashore

(3) Boom in pockets of oil for shoreline recovery

(4) Deploy VOSS downwind in bay for open water collection

In **Medium or Minor** Spills the booming priorities are:

(1) Boom around vessel source if flow cannot be stopped

(2) Boom in pockets for shoreline recovery

Open Lake Environment Protection Strategies:

The expansiveness of Lake Erie, wave height, and wind conditions dictates a different response strategy than that in river environments. The western end of Lake Erie borders many environmentally sensitive areas. The response strategy for open lake recovery is to carefully track the oil, project expected paths, protect limited areas with boom, and attempt open water recovery of significant pockets with the Vessel of Opportunity Skimming System (VOSS) or other equipment made available through pollution contractors. Generally in Major Spills the booming priorities are:

(1) Boom down wind/down current area of vessel to pocket oil

(2) Deploy VOSS for Open Water Recovery

(3) Protective boom sensitive areas in way of spill trajectory

(4) Boom in pockets of oil, which reaches shore for shoreline recovery

In **Medium or Minor** Spills the booming priorities are:

(1) Monitor spill trajectory/extent

(2) Protective boom sensitive areas in way of spill trajectory

(3) Boom in pockets of oil, which reaches shore for shoreline recovery

Creek Environment Protection Strategies:

Spills into creeks are unique in that the distance from bank to bank is quite limited. This may allow larger spills to accumulate in depth. Creeks flow quickly in very narrow areas and slow as the width of the stream increases. These wider areas are good locations to deploy boom to slow and eventually collect the flowing oil. Vacuum trucks can often recover pure product from these boomed locations. If there are localized wetlands in the area, boom can be deployed parallel to the bank to keep much of the oil flowing past the area. During periods of heavy rainfall, creek levels will quickly rise spreading oil over a larger area or into a larger body of water. In a major or larger medium spills the booming priorities are:

(1) Approach scene cautiously with atmospheric monitoring equipment. Creeks can concentrate toxic oil / chemical properties. Gasoline will be above LEL at some point above creek level. Vapors may be above TLV for Benzene or general hydrocarbons.

(2) Select a low current location ahead of spill and angle several lengths of boom across creek in a "Z" pattern for containment and shoreline recovery of oil.

(3) Deploy deflection boom across sensitive areas.

(4) Backup recovery locations with additional boom and vac trucks, or select additional locations.

In **minor or smaller medium** spills the booming priorities are:

(1) Survey creek banks to determine extent of spill and contamination.

(2) Deploy deflection boom across localized sensitive areas if warranted.

3220 On-Water Recovery Group

The On Water Recovery Group is responsible for managing on water recovery operations in compliance with the IAP.

3220.1 Recovery and Storage Options

In the case of a large pollution incident, the Recovery and Protection Branch Supervisor is responsible for obtaining through Logistics, adequate temporary storage (*i.e.*, Frac tanks, baker tanks) in adequate numbers to contain all of the hazardous material. Reference: Logistics Support 5300 for equipment sources.

3230 Shoreside Recovery Group

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

3240 Disposal Group

The FOSC will assure 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.

- Ensure waste disposal complies with Resource Conservation and Recovery Act (RCRA) requirements

- Ensure a Hazardous Waste Manifest is generated for disposals involving 5 gallons or more of petroleum products (or as otherwise dictated by Ohio Department of Health Services or **EPA-RCRA Hot Line 1-800-424-9346**). Disposals of less than 5 gallons or 50 pounds must comply with RCRA but may not require a manifest

- Determine temporary and ultimate disposal sites as appropriate

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

General guidelines:

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 material 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 maybe

classified as a “hazardous waste”. First, if the waste is listed under RCRA regulations (40 CFR 261.20 – 261.24) or if it has one of four of the following characteristics: ignitability, corrosivity, reactivity, and toxicity, as listed in 40 CFR 261. Any discussion of the disposal of oil or hazardous material recovered during the cleanup of a discharge or release in the Western Lake Erie Zone must first recognize that the location of the removal site will play a major role in the disposal method decision-making process. In addition, each of the states within the zone has it 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. The following general policy statements are based on local worst-case scenarios as stated in Section 9000 and Appendix D to this plan.

Cleanup contractors can arrange for testing, but this is considered subcontracting, requiring approval of USCG Contracting Officer (if FOSC hired contractor). The contractor should hold material on-site until test is completed and the material is accepted by a disposal facility. Improper disposal of these materials may cause injury or death, and may also damage or pollute the environment. It is the generator’s responsibility to determine whether the material is hazardous and to ensure proper disposal. A cleanup contractor can arrange for disposal, but this is also considered subcontracting which first requires USCG Contracting Officer approval (if FOSC hired contractor). If the product is unknown, testing is required to determine if it is a hazardous waste.

3240.1 Decanting Policy

Decanting is the process of draining off recovered water from portable tanks, internal tanks, collection wells or other storage containers to increase the available storage capacity of recovered oil. When decanting is conducted properly most of the water can be removed from the collected petroleum. Decanting must be authorized by the state representative to the unified command.

Vacuum trucks are routinely used for oil recovery along shorelines and in shallow water. Prior to using an unclean vacuum truck for the collection of oil, with subsequent decanting of water, a check of the containment tank is required to ensure there are no contaminants from previous activities and that the water decanted is safe to discharge back into the environment. A chlorine test will be used for this purpose. A record of the test will be retained as part of the incident disposal file.

3240.2 Sample Waste Management Plan

Reference: Permits in Planning.

3250 Decontamination Group

The Decontamination Group 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 Safety Plan.

Personnel responding to hazardous substance incidents may become contaminated in a number of ways, including:

- Contacting vapors, gases, or particulates in the air
- Being splashed by materials while sampling or opening containers
- Walking through puddles of liquids or on contaminated soil
- Using contaminated instruments or equipment

Decontamination consists of physically removing contaminants or changing their chemical nature to innocuous substances. The extent of decontamination depends on a number of factors, the most important being the type of contaminants involved.

A decontamination plan should be developed as part of the safety plan for an emergency response. The initial decontamination plan is based on a worst-case situation or assumes no information is available about the incident. Specific conditions (*e.g.*, type of contaminant, amount of contamination, levels of protection required, type of protective clothing worn) are then evaluated, and the initial decontamination plan is modified to adapt as new information about site conditions becomes available. All materials and equipment used for decontamination must be disposed of properly.

In addition to routine decontamination procedures, emergency decontamination procedures must be established. In an emergency, the primary concern is to prevent the loss of life or severe injury to site personnel. If immediate medical treatment is required to save a life, decontamination should be delayed until the victim is stabilized. If decontamination can be performed without interfering with essential lifesaving techniques or first aid, or if a worker has been contaminated with an extremely toxic or corrosive material that could cause severe injury or loss of life, decontamination must be performed immediately. During an emergency, provision must also be made for protecting medical personnel and disposing of contaminated clothing and equipment.

A sample Decontamination Plan follows on page 3000-8.

Sample Decontamination Plan

CG ICS SSP: DECONTAMINATION	1. Incident Name	2. Date/Time Prepared	3. Operational Period	4. Safety Officer (include method of contact
5. Supervisor/Leader	6. Location and Size of Site	7. For Emergencies Contact:		8. Hazard(s) Addressed

9. Equipment:				10. References Consulted:

11. Contamination Avoidance Practices:	12. Decon Diagram	13. Decon Steps

14. Prepared By:	15. Date/Time Briefed	Potential Health Effects: Bruise/Lacerations, Organ Damage, Central Nervous System Effects, Cancer, Reproductive Damage, Low Back Pain, Temporary Hearing Loss, Dermatitis, Respiratory Effects, Bone Breaks, Eye Burning	**Form SSP-G:** Page _____of ___.

3260 Dispersants

It should be noted that RRT 5 prohibits the use of sinking agents. For the use of other chemical agents in responses refer to Appendix VII of the RRT 5 RCP-ACP.

3270 *In-situ* Burning

Guidelines are incorporated in Appendix VIII of the RRT 5 RCP-ACP.

3280 Bioremediation Policy

The policy on the use and approval or disapproval of bioremediation techniques is made at the RRT 5 level. As these policies are developed they will be published in the RRT 5 RCP-ACP.

3300 Emergency Response

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:

Search and Rescue (SAR) Group	Hazardous Materials Group
Salvage Group	Emergency Medical Services Group
Fire Suppression Group	Law Enforcement Group

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3310 Search and Rescue Group

The SAR Group is responsible for prioritization and coordination of all search and rescue missions directly related to a specific incident. All search and rescue operations on Lake Erie are coordinated and supported through USCG Group Detroit and the following USCG resources:

UNIT	RESOURCE	NOTES	TELEPHONE
USCG Station Toledo	1-41 ft Utility Boat 1-21 ft Rigid Hull	Crew of 3 Crew of 2	(419) 729-2034
USCG Station Marblehead	1-47 ft Motor Life Boat 1-41 ft Utility Boat 1-21 ft Rigid Hull 2-PWC (Jet Ski's)	Crew of 4 Crew of 3 Crew of 2 Crew of 1	(419) 798-4444
USCGC Neah Bay	140 ft Ice Breaker	Obtain through D9 Command center	(216) 522-4414 (Ship's number)
USCGC Bristol Bay	14O ft Ice Breaker	Obtain through D9 Command center	(313) 568-9548 (Ship's number)
USCG Air Station Detroit	4-Helicopters HH-65A Dolphin	Obtain through D9 Command center	(810) 307-6700
Toledo Fire Department	1-30ft Fire Boat Water Rescue RHI	Crew of 3 Crew of 2, plus diver	(419) 245-1180

3320 Salvage Group

The Salvage Group is responsible for coordinating salvage operations with vessel owners to open and maintain shipping channels. Experts from the following organizations can provide assistance as needed for salvage operations.

Organization	Normal Hours	Emergency (24-hr)
USCG Marine Safety Center	Phone: (202) 366-6480	Phone: (800) 424-8802
Salvage Engineering Response Team (SERT) SERT Team Leader SERT Duty Watchstander WEBSITE	 Duty Pager: (866) 263-4918 Duty Pager: (866) 263-4919 www.uscg.mil/hq/msc/sertinfo.com	
Navy Supervisor of Salvage (SUPSALV)	Phone: (703) 602-7527	Phone: (703) 607-2578
USCG Atlantic Strike Team	Phone: (609) 724-0008 Fax: (609) 724-0232	Phone: (609) 724-0008

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

The following information is provided from Chapter 8 of Volume 1 of the U.S. Navy Salvage Manual:

- Upon stranding, the vessel's master/RP should take the following steps:
  - Have ship's personnel report to emergency stations
  - Secure watertight closures
  - Notify the USCG
  - Note course and speed at time of stranding
  - Obtain and provide an accurate cargo stowage plan

- Evaluate the following:
  - Safety of personnel
  - Weather and sea conditions
  - Forecast for change in weather and sea conditions
  - Nature of the seafloor and shoreline
  - Depth of water around ship
  - Ground reaction
  - Damage to hull
  - Damage to shafting, screws, and rudder
  - Risk of further damage
  - Prospect of maintaining communications
  - Likely draft/trim
  - Potential for discharge of pollutants
  - Position of vital and cargo systems' valves
  - The liquid level of all tankage (i.e. fuel, ballast, cargo, etc.)
  - Take action to stabilize the ship

- Request salvage assistance immediately. If the damage assessment shows the ship will not broach, sink, or capsize, the master can attempt to back the vessel clear only with approval from the COTP

- The vessel's master should **NOT**:
  - Jettison weight (lighter) in an attempt to lighten the ship prior to an attempt to back the vessel off
  - Attempt to back the vessel off when the bottom is torn open
  - Fail to take action to stabilize the ship and to determine its condition

- The Unified Command **SHOULD**:
  - Identify salvage resources available and time required for the following resources to arrive on scene
  - Salvage Manager
  - Classification Society
  - USCG Marine Safety Center
  - USCG Atlantic Strike Team Representative
  - Salvage vessel(s)
  - Tugs
  - Beach gear
  - Barges with ground tackle
  - Lifting vessels
  - Pumps and hoses
  - Hull patching equipment, cement
  - Initiate salvage response. Over-estimate resources needed
  - Inform vessel's master of all actions taken
  - Obtain services of naval architect
  - Conduct analysis of ship's longitudinal strength and damaged stability

3330 Fire Suppression Group (See also Section 8000 of this ACP)

The Fire Suppression Group is responsible for coordinating and directing all fire fighting activities relating to the incident. This activity will be conducted by the local fire department with jurisdiction over the location of the ship or facility.

- Initially, the local Fire Chief assumes the IC role.
- Prioritize responses to fires related to the incident.
- Direct and coordinate firefighting resources and those brought in from other jurisdictions.
- Manage dedicated firefighting resources

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3340 Hazardous Materials Group

The Hazardous Materials Group is responsible for coordinating and directing all hazardous materials activities related to the incident. This activity will be conducted by the local fire department with jurisdiction over the location of the incident.

- Usually the local Fire Chief assigns a key member to coordinate these activities, otherwise

- The Fire Department HAZMAT Team with authority over the incident location will respond within their jurisdiction
- U.S. EPA can provide HAZMAT assistance
- Direct and coordinate HAZMAT responses
- Prioritize HAZMAT responses related to the incident
- Manage dedicated HAZMAT resources

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3340.1 Initial Response Notifications

Always Notify:

- Chain of command: getting first responders underway as appropriate
- State Lead Agency (Ohio EPA or Michigan DEQ)
- Fire department and other local response agency

Marine Safety Office Toledo	(419) 418-6000
National Response Center	(800) 424-8802 (24-hr)
USCG OPCEN (Cleveland)	(800) 321-4400
U.S. EPA Region 5	(312) 353-2318 (24-hr)

For Incidents impacting Canadian Waters notify:

Canadian Coast Guard Spill Center	Phone: (800) 265-0237 (24-hr)

For incidents in Ohio notify:

Ohio EPA	(614) 224-0946 (800) 282-9378 (24-hr Ohio in-state calls)
Ohio DNR (Great Lakes incidents, only)	(419) 625-8062
Ohio DNR (Inland incidents, only)	(419) 424-5000
Ohio EMA	(614) 889-7000
Ohio Public Utilities Commission	(614) 644-8976
Erie County Sheriff	(419) 625-7951 (24-hr.)
Lucas County Sheriff	(419) 243-5111 (24-hr)
Ottawa County Sheriff	(419) 734-4404 (24-hr.)
Sandusky County Sheriff	(419) 332-2613 (24-hr.)
Wood County Sheriff	(419) 354-9001 (24-hr.)

For incidents in Michigan notify:

Michigan DEQ, Surface Water Division	(517) 780-7690 (day)
Michigan DNR	(734) 953-0253 (day)
PEAS Pollution Emergency Alert System	(517) 373-7660 (24-hr.) (800) 292-4706 (24-hr Michigan in-state)
Michigan State Police (Monroe)	(734) 243-7070 (24-hr)
Monroe County Sheriff	(734)243-7070 (24-hr)
City of Monroe Fire Department	(734) 241-1626 (24-hr)

3340.2 Evacuation Procedures

Under the Direction of the Emergency Response Branch Director, the Law Enforcement Group Supervisor is responsible for coordinating the Evacuation Procedures. Evacuation Procedures are incident specific and involve local and State Public Health authorities.

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, the County Sheriff or Public Health Official. See the specific county Emergency Operation Plans (EOP's) or contact the following:

County	Director/Coordinator	Telephone Number
Lucas County EMA	Mr. William Halsey	(419) 213-6503
Wood County EMA	Mr. Jonathan Eric Larson	(419) 354-9269
Ottawa County EMA	Mr. James Greer	(419) 734-6900
Sandusky County EMA	Mr. Mark Smith	(419) 334-6423
Erie County EMA	Mr. William Walker	(419) 627-7617
Monroe (MI) County EMA	Mr. Mitchell Yudasz	(734) 240-3135

3340.3 HAZMAT Points of Contact

To be determined.

3340.4 Types Of HAZMAT Equipment Available

To be determined.

3350 Emergency Medical Services Group

To be determined.

3360 Law Enforcement Group

The Law Enforcement Group is responsible for coordinating and directing all law enforcement activities related to the incident. This may include, but is not limited to isolating the incident, crowd control, traffic control, evacuations, and perimeter security. The local police department with jurisdiction over the location of the incident will be responsible for this activity.

Law Enforcement Agencies State/County/Local:

Ohio State Police (Highway Patrol)	(419) 666-1323
Ohio State Police (Sandusky)	(419) 625-6565
Michigan State Police	(313) 242-3500
Monroe County Sheriff (Michigan)	(734) 240-7400
Lucas County Sheriff (Ohio)	(419) 213-4908
Erie County Sheriff (Ohio)	(419) 627-7668
Huron county Sheriff	(419) 668-6912
Sandusky County Sheriff	(419) 332-2613
Toledo Police	(419) 245-3340
Toledo Police Marine Unit	(419) 936-3076

Oregon Police	(419) 698-7062
Maumee Police	(419) 897-7025
Port Clinton Police	(419) 734-3121
Marblehead Police	(419) 798-5881
Lakeside Police	(419) 798-4467
Sandusky Police	(419) 627-5863
Put-In-Bay Police	(419) 285-4121
Huron Police	(419) 433-5568
Vermillon Police	(440) 967-6116

3360.1 Perimeter/Crowd/Traffic/Beach Control

Perimeter/Crowd/Traffic/Beach Control/Safety/Security Zones will be controlled by the Law Enforcement Agency with jurisdiction around the scene.

3400 Air Operations

The Air Operations Director, who is ground based, is primarily responsible for preparing the air operations portion of the IAP. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3410 Air Tactical Group

The Air Tactical Group Supervisor is primarily responsible for coordination and scheduling of aircraft operations intended to locate, observe, track, survey, support dispersant applications, or other deliverable response application techniques, or report on the incident situation when fixed and/or rotary-wing aircraft are airborne at an incident. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3420 Air Support

The Air Support Group Supervisor is primarily responsible for supporting and managing helibase and heliport operations, and maintaining liaison with fixed-wing air bases. This includes providing:

- Fuel and other supplies
- Maintenance and repair of helicopters
- Keeping records of helicopter activity
- Providing enforcement of safety regulations

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

3500 Staging Areas

The staging area is controlled by the Operations Section and has an assigned Staging Area Manager. This manager is responsible for managing all activities within the designated staging

areas. Additional information regarding this position can be found in the USCG Incident Management Handbook (April 2001).

3510 Pre-Identified Staging Areas

Numerous staging areas have been preliminarily identified in the event of a spill incident.

Toledo Municipal Area Staging Areas:

Promenade Park (West bank)	Adjacent to old Steam Plant, behind where old Federal building location.
International Park (East bank)	Behind Park & Recreation Building
AMO Dock (West bank)	Behind Channel 11 TV Station and AMO Building on Summit Street.
Sun Oil Dock (East bank)	Turn off of Front St. at corner of Consual St. toward river. Follow dirt road to dock.
Toledo Shipyard (East bank)	Off of front Street.
Clark Oil Dock (West bank)	Off of Summit St.
BP Oil Dock (East bank)	Turn off Front St. at Mallard St. towards river.
Toledo World Industries Terminal (East bank)	At the end of Front Street, Use any empty dock space.
USCG Station Toledo (West bank)	Turn off of Summit St. at Bay View Park, Follow road to the left.
Brenner Marine (East bank)	Located next to the Toledo Sports Arena, off of Cherry Street.

River Raisin, Monroe, Michigan Staging Areas:

Thompson McCully Dock	North on I-75, SE on East Front Street, turn left on Port Avenue.

Huron River, Huron, Ohio Staging Areas:

Twine House (East bank)	Route 2 East to Route 6, North on Williams Street, East on South Street, North on Main to end of street.
City Park (East bank)	Route 2 East to Route 6, North on Williams Street, east on South Street, North on Main to end of street.

Sandusky Bay/Harbor, Sandusky, Ohio Staging Areas:

Battery Park Marina (South shore)	Route 6, East on Washington, North on Meigs to end of Street.
Ohio DNR (South shore)	Route 6, North on Lawrence, East on Shoreline.
City Docks (South shore)	Route 6, North on Lawrence, East on Shoreline.
Royal Yacht Services (South shore)	Route 6, North on Putnam to the end of the street.

3511 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 Incident Management Handbook (April 2001).

3600 Wildlife Branch

The Wildlife Recovery Branch is responsible for minimizing wildlife losses during spill responses, to see that the following activities are carried out in any response where wildlife may have been affected. DOI (USFWS) and DNR (which will normally take the lead) should arrange for the coordination of bird cleaning activities.

- Notify special groups: Nature Nursery and Tristate Animal Rescue
- Document damage with photos and written statements (Wildlife/Vegetation/Property)
- Determine environmental medium(s) affected (Water, Land, Air/Surface, subsurface)

Ensure trustees of natural resources are notified and aware of their responsibility for damage assessment and associated cost recovery; devising protection, rehabilitation and restoration plans for natural resources affected; endangered and migratory species; birds flying into plumes, and marine life entering contaminated water.

3610 Fish and Wildlife Protection Options

The contamination of wildlife by oil has a high public impact, which must be recognized by the FOSC and members of the RRT. Public interest, inquiries, criticism, and demands for the cleaning of affected wildlife can seriously hamper the FOSC's ability to proceed with mitigation of the spill. Early inspection of impacted or potentially impacted areas known to be wildlife habitat should be made by the FOSC, and at the first sign of wildlife involvement, the FOSC should contact the DOI representative on the RRT 5 to request organization and supervision of the protection efforts. Funding will be required either from the RP or the OSLTF 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 non-oiled 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 it's efforts with the NRDA Unit via the LO and the Resources-at-Risk Specialists within the Environmental Unit of Planning. Federal trustees from the USFWS and state trustees from the DNR, as well as Tribal trustees will have personnel in these cells, in addition to members from any of the organizations mentioned above. This coordination must start up early if these cells are activated.

More detailed information on this topic can be found in RRT 5 RCP-ACP, Appendix 9, Fish and

Wildlife and Sensitive Environments Annex that accompanies this ACP on a CD as a supporting document.

3620 Wildlife Recovery Operations/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 the appropriate state and federal natural resource trustees, because state and federal permits are usually required for such activities. DOI has statutory responsibilities (delegated to the 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.

More detailed information on this topic can be found in RRT 5 RCP-ACP, Appendix 9, Fish and Wildlife and Sensitive Environments Annex that accompanies this ACP on a CD as a supporting document.

3700 Reserved

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3900 Reserved For Area/District

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4000 Planning

4100 Planning Section Organization

The Planning Section is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. Information is needed to: (1) understand the current situation, (2) predict probable course of incident events, and (3) prepare alternative strategies for the incident. The following is an organization chart of the Planning Section and its subordinate units. It serves as an example and is not meant to be all-inclusive.

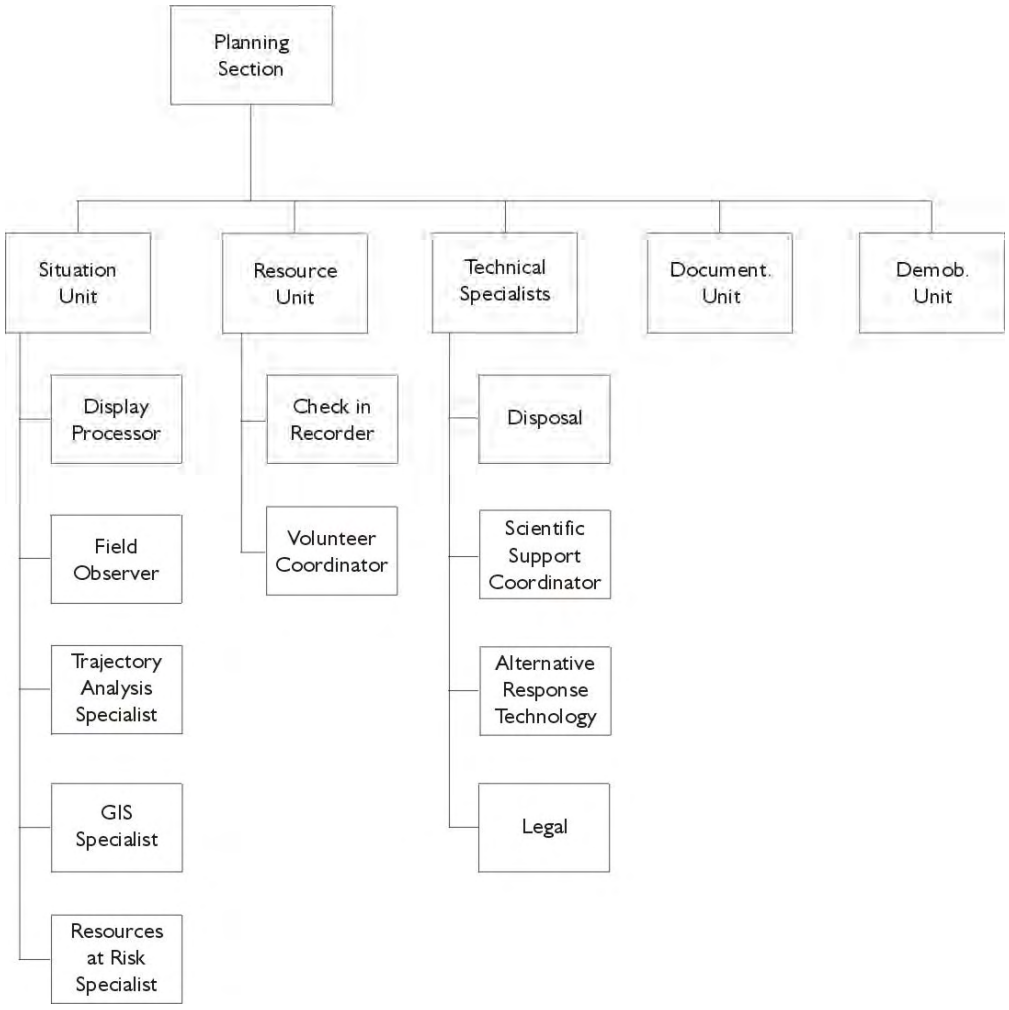


Figure 4100.1, Planning Section

4110 Planning Section Chief

The Planning Section Chief (PSC) is specifically responsible for collecting, evaluating, disseminating, and using information about the incident and status of resources. The PSC facilitates or manages all the meetings held by the IC or UC, in particular, the development of the IAP as described in the next section.

4120 Planning Section Planning Cycle Guide

The period of *initial response and assessment* occurs in all incidents. Short-term responses that are either small in scope and/or duration (*e.g.*, few resources working one operational period) can often be coordinated using only ICS Form 201 briefings. Long-term, more complex responses will likely require a dedicated PSC who must arrange for transition into the *operational period planning cycle*. Certain meetings, briefings, and information gathering during the cycle lead to the IAP that guides operations of the next operational period. Only the meetings and events directly relevant to assembling the IAP are described. The IC/UC specifies the operational periods.

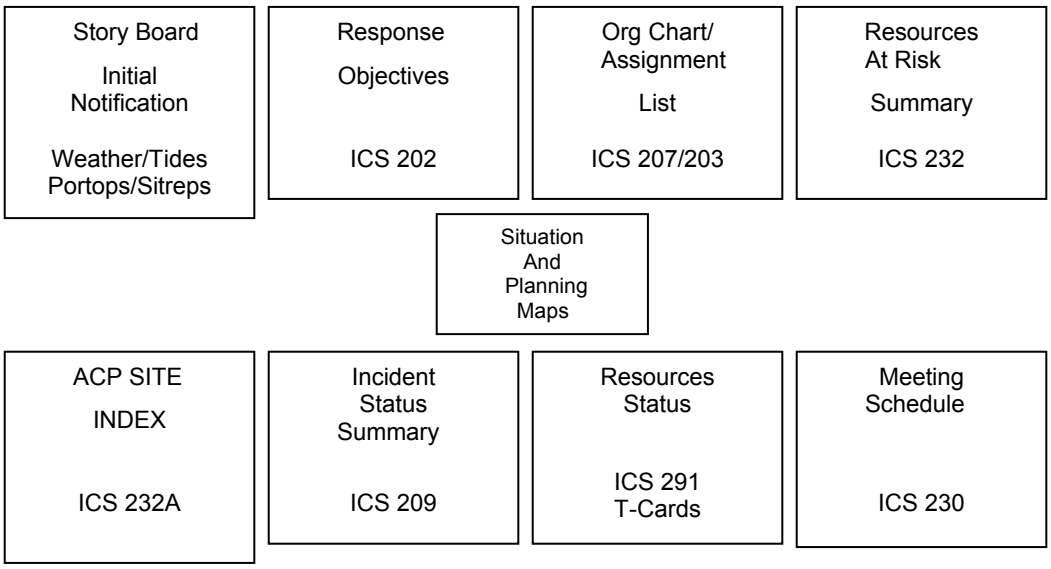
4200 Situation Unit

The Situation Unit is responsible for the collection and evaluation of information about the current and possible future status of the spill and spill response operations. This responsibility includes the compilation of information regarding the type and amount of oil spilled, the amount of oil recovered, the oil's current location and anticipated trajectory, and impacts on natural resources. This responsibility includes providing information for the creation of maps to depict the current and possible future situation and the preparation of reports for the PSC. The Situation Unit Leader is responsible for the following sub-units:

- Display Processor
- Field Observers
- Geographic Information System (GIS) Specialist

The Display Processor is responsible for displaying current information collected from field observers, resource status reports, aerial reconnaissance, and any other relevant sources. A sample display at a command center is shown below:

This is an example of Status Boards for Situation Display and is for planning purposes only.



Additional information regarding these positions under ICS can be found in the USCG

Incident Management Handbook (April 2001).

4300 Resources

The Resource Unit is responsible for maintaining the status of all resources (primary and support) at an incident. This is achieved through development and maintenance of a master list of all resources including check-in, status, current location, etc. This unit is also responsible for preparing parts of the IAP and compiling the entire plan in conjunction with other members of the ICS, and determines the availability of resources. Resources can be tracked through a number of different systems (T-cards, computer databases, etc.). These services should be available to the Resources Unit once activated.

In addition, the Resource Unit Leader is responsible for the following sub-units:

- Check-In Recorders
- Volunteer Coordinator

4310 Check-in Recorder

All personnel responding to an incident must check-in at designated locations. The recorder at each of the designated sites must record information using ICS Form 211 (ICS Check-In Lists).

4320 Volunteer Coordinator

The Volunteer Coordinator is responsible for managing and overseeing all aspects of volunteer participation, including recruitment, induction, and deployment. Volunteers usually are involved in wildlife recovery and rehabilitation activities during an incident. All volunteers must be appropriately trained, precisely scheduled for suitable tasks, and must be supervised at all times. 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.

Tri-State Bird Rescue and Research, Inc. 110 Possum Hollow Road Newark, New Jersey 19711 Phone: (302) 737-7241 (800) 710-0695 or 0696 (24-hr) Fax: (302) 737-9562	**International Bird Rescue Research Center** 699 Potter Street Berkeley, California 94710 Phone: (510) 841-9086 Fax: (510) 841-9089

Additional information regarding these positions under ICS can be found in the USCG Incident Management Handbook (April 2001).

4400 Documentation Unit

The Documentation Unit is responsible for the maintenance of accurate, up-to-date incident files. Examples of incident documentation include:

- Incident Action Plan (IAP)
- Incident reports
- Communication logs
- Injury claims
- Situation status reports

Thorough documentation is critical to post-incident analysis. Some of these documents may originate in other sections. This unit shall ensure each section is maintaining and providing appropriate documents. Incident files will be stored for legal, analytical, and historical purposes. The Documentation Unit also provides duplication and copying services.

Additional information regarding these positions under ICS can be found in the USCG Incident Management Handbook (April 2001).

4500 Demobilization Unit

The Demobilization Unit is responsible for developing the Incident Demobilization Plan, and assisting Sections/Units in ensuring that an orderly, safe, and cost effective demobilization of personnel and equipment is accomplished from the incident. Additional information regarding these positions under ICS can be found in the USCG Incident Management Handbook (April 2001).

4510 Sample Demobolization Plan

Agency requirements for demobilization at an incident will vary considerably. Large incidents may require the establishment of a Demobilization Unit within the Planning Section. General demobilization considerations for all personnel are to:

- Complete all work assignments
- Brief subordinates regarding demobilization
- Complete and file required forms and reports
- Follow incident and agency check-out procedures
- Evaluate performance of subordinates prior to release from the incident
- Return any incident issued communications equipment or other non-expendable supplies
- Report to assigned departure points on time

4600 Environmental

Maps and databases detailing environmentally sensitive areas and threatened and endangered species have been developed for the six county region of the Western Lake Erie ACP. They have been developed for the use of emergency planners and responders to assist is protection awareness and prioritization in the event of a spill. These databases contain locations and contact information (business and emergency), impacting water bodies, site-specific comments, and the managing agency. Each site was surveyed by the Area Committee and reviewed by the site manager for accuracy of

existing data and updating of information. The Area Committee has identified over 125 environmentally sensitive areas within the Western Lake Erie Area. This information will be available in a number of formats, including: electronic database, GIS, paper maps with supporting documentation, and Internet. The information presented in these databases are maintained with this plan. The following personnel from the Situation Unit should be utilizing this information as soon as possible during an oil discharge or chemical release:

- NOAA SSC & Resources At Risk Specialists (Trustees)
- Trajectory Analysis Specialists/Geographic Information Specialists
- Sampling Specialists & Disposal Specialists
- Historical/Cultural Resources Specialists
- Response Technologies Specialists
- Environmental Unit Leader

Information concerning historical and archeological sensitive areas are provided by the State Historic Preservation Officer (SHPO) directly to the FOSC upon request.

Surface Water Intakes:
A database has been developed for the six county region of the Western Lake Erie ACP for potable, industrial, and other use surface water intakes. This database contains the locations, contact, and various attributes of the 41 identified surface water intakes in the coastal/inland zone. This information has been gathered by the Area Committee for use in its original format as well as for incorporation into the GIS mapping efforts. Each facility within this database was surveyed for data verification and updating. Name, county, address, telephone number, water-body from which the water is withdrawn, and lat/long coordinates for these facilities are included below.

Michigan Water Intakes:

Name	Coord. Lat/Long	Water-body	Water Use	Emergency Contact	Contact Number
Dundee Water Treatment	41-56.4 N 083-40.8 W	River Raisin	Public Water Use	(313) 243-7070	(734) 529-2090
France Stone Company	41-54.3 N 083-24.5 W	Plum Creek	Industrial	(734) 243-7070	(734) 241-8966
J R Whiting Power Plant	41-47.5 N 083-51.7 W	Lake Erie	Power Generating	(734) 243-7070	(734) 848-3408
Enrico Fermi Water Plant	41-57.6 N 083-15.1 W	Lake Erie	Power Generating	(734) 243-7070	(734) 586-5338
Detroit Edison Monroe Plant	41-53.5 N 083-20.7 W	Lake Erie	Power Generating	(734) 243-7070	(734) 241-5947
Ford Monroe Plant	41-54.2 N 083-21.1 W	Lake Erie	Industrial	(734) 347-7070	
Monroe Metro Waste Water Treatment	41-54.1 N 083-22.1	River Raisin	Waste Water Treatment	(734) 347-7070	
Wilfred L Lepage Raw Water	41-56.1 N 083-14.3 W	Lake Erie	Public Water Supply	(734) 457-3202	(734) 241-5947

Pumping					

Ohio Water Intakes:

Name	Coord. Lat/Long	Water-body	Water Use	Emergency Contact	Contact Telephone
Toledo Edison Acme Sta.	41-39.3 N 083-31 W	Maumee River	Power Gen.	(419) 249-5700	(419) 249-5882
BP Oil Co. Toledo Refinery	41-41.3N 83-27.1W	Maumee Bay	Industrial	(419) 698-6451x6493	(419) 698-6200 x6400
Bowling Green Water Intake	41-28.6N 83-44.3W	Maumee River	Drinking Water	(419) 878-6986	(419) 878-6986
Brush Wellman Inc.	41-29.5N 83-13.2W	Portage River		(419) 862-2745	(419) 862-2745
Camp Patmos	41-36.9N 82-41.1W	Lake Erie	Drinking Water	(419) 746-2214	(419) 746-2214
Camp Perry Water Plant	41-33.2N 83-01.9W	Lake Erie			
City of Clyde	41-17.4N 82-58.7W	Raccoon Creek & Beaver Creek	Drinking Water	(419) 547-9805	(419) 547-9805
Sandusky Raccoon Creek	41-17.4N 82-58.7W	Raccoon Creek			
City of Fremont	41-19.5N 83-08.2W	Sandusky River	Drinking Water	(419) 332-3581	(419) 332-3581
City of Huron	41-24.3N 82-33.4W	Lake Erie	Drinking Water	(419) 433-9502 (419) 433-4114	(419) 433-5000
City of Oregon Water intake #1	41-41.5N 83-16.3W	Lake Erie	Drinking Water	(419) 836-8286	(419) 836-8286
City of Oregon Water intake #2	41-31.3N 83-16.4W	Lake Erie	Drinking Water	(419) 836-8286	(419) 836-8286
City of Port Clinton	41-31.3N 82-56.4W	Lake Erie	Drinking Water	(419) 734-4330	(419) 734-4330
City of Sandusky	41-27.7N 82-38.2W	Lake Erie	Drinking Water	(419) 627-5904	(419) 627-5904
City of Toledo	41-41.9N 83-15.5W	Lake Erie	Drinking Water	(419) 936-3025	(419) 936-3025
City of Vermillion Intake # 1	41-25.6N 82-22.1W	Lake Erie	Drinking Water	(440) 967-4114	(440) 967-4114
City of Vermillion Intake # 2	41-25.4N 82-21.8W	Lake Erie	Drinking Water	(440) 967-4114	(440) 967-4114
Cygnet Turf and Equipment	41-10.8N 83-39.1W	Pond	Unknown	(419) 354-1112	(419) 354-1112
Davis-Besse	41-36.3N	Lake Erie	Cooling	(419) 321-7269	(419) 321-7269

Nuclear Power Station	83-03.9W			(419) 321-7260	(419) 321-7260
Erie Industrial Park	41-34.2N 83-01.7W	Lake Erie	Drinking, fire	(419) 635-0048	(419) 635-4051
Erie Materials, Inc.	41-24.8N 82-45.9W	Quarry	Unknown		(419) 625-7374
Grand Rapids Water Dept.	41-24.7N 83-52.7W	Maumee River	Unknown		(419) 832-5305
Great Lakes Sugar Co.	41-21.2N 83-06.4W	Sandusky River	Cooling	(419) 2-1501	(517) 799-7300
Green Cove Condominium	41-36.2N 83-06.2W	Lake Erie	Unknown		(419) 898-3398
Kelleys Island Water Dept.	41-35.5N 82-42.6W	Lake Erie	Drinking		(419) 746-2555
Lafarge Construction	41-31.5N 82-43.8W	Lake Erie	Washing Stone		(419) 798-4486
Lake Erie Utilities Co.	41-41.4N 82-49.0W	Lake Erie	Drinking		(419) 285-5571
Sandusky Dock.	41-27.4N 82-44.1W	Lake Erie	Dust Suppression		(419) 626-1214
Toledo Edison Acme Station	41-39.3N 83-31W	Lake Erie	Cooling		(419) 249-5882
Toledo Edison Bay Shore Station	41-41.5 N 083-26.2 W	Lake Erie	Cooling	(419) 249-5787	(419) 249-5700
Village of Marblehead #1	41-32.6 N 082-43.6 W	Lake Erie	Public Water Supply	(419) 798-5836	(419) 798-5836
Village of Marblehead #2	41-32.8 N 083-43.5 W	Lake Erie	Public Water Supply	(419) 798-5836	(419) 798-5836
Village of Put-In-Bay	41-38.7 N 082-48.7 W	Lake Erie	Public Water Supply	(419) 734-4404	(419) 285-8545 (419) 261-1519

Marinas and Boat Launches:

The Area Committee has identified approximately 150 marinas and boat launches within the six county regions of the Western Lake Erie coastal and inland zones. This information is included with the general data gathering and mapping effort. This information is presented in the sensitivity mapping effort that is appended to this plan in hardcopy atlas and electronic format. The information for these facilities contains locations, contact, and site-specific data for each marina and boat launching facility. Each facility was surveyed for data verification and correction.

4700 Technical Support

Technical Specialists are advisors with special skills needed to support the incident. Technical Specialists may be assigned anywhere in the ICS organization. If necessary, Technical Specialists may be formed into a separate unit. The Planning Section will maintain a list of available specialists and will assign them where needed. A more detailed description of the positions and responsibilities of the Planning Section are contained in the USCG Incident Management Handbook (April 2001).

4800 Required Correspondence, Permits & Consultation

There are a number of documents that are required from the USCG, U.S. EPA, and other federal and state agencies. This section will be expanded as more information is collected from all the different agencies.

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 resources can assist in your effort.

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.

Sources of Federal Permits:

Migratory Bird Permits:	**Inquiries regarding Federal Endangered Species permits may be directed to:**
Migratory Bird Permit Office U.S. Fish and Wildlife Service	Ecological Services Operations U.S Fish and Wildlife Services

1 Federal Drive Fort Snelling, MN 55111-4056 (612) 713-5436	1 Federal Drive Fort Snelling, MN 55111-4056 (612) 713-5350

State Permits:

Ohio Department of Natural Resources	(419) 625-8062
Michigan Department of Natural Resources	(734) 953-0241

More detailed information on this topic can be found in RRT 5 RCP-ACP, Appendix 9, Fish and Wildlife and Sensitive Environments Annex that accompanies this ACP on a CD as a supporting document.

4820 Disposal

Refer to **Section 3240**

4830 Dredging

To be developed.

4840 Decanting

Refer to **Section 3240.2**

4800 Reserved for Area/District

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5000 Logistics

5100 Logistics Section Organization

The Logistics Section is responsible for providing facilities, services, and material in support of the incident. The following is an organization chart of the Logistics Section and its subordinate units. It serves as an example and is not meant to be all-inclusive.

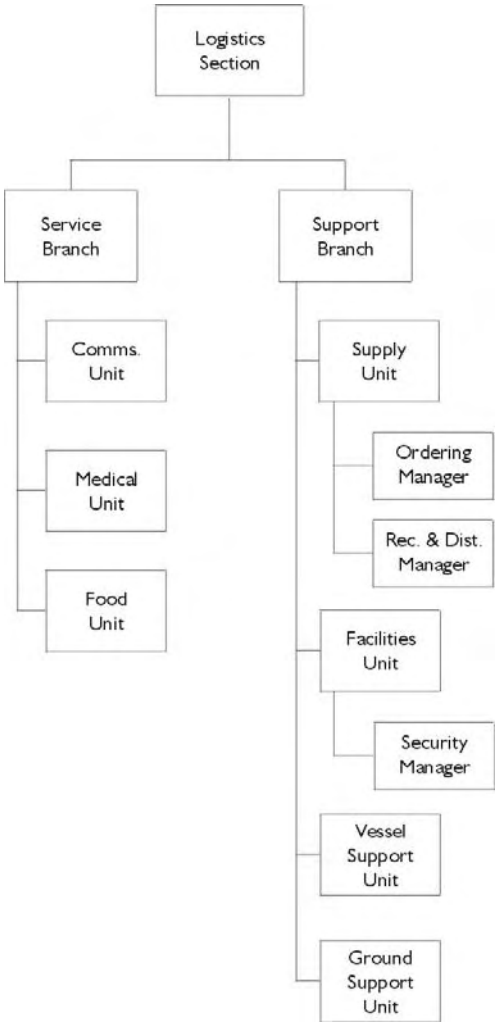

Figure 5100.1, Logistics Section

5110 Logistics Section Chief

The Logistics Section Chief (LSC) participates in development and implementation of the IAP and activates and supervises Branches and Units within the Logistics Section in accordance with the protocol of ICS.

Additional information regarding this position can be found in the USCG Incident Management Handbook (April 2001) and LSC Job Aid which can be found at the National Strike Force Coordination Center's web page http://www.uscg.mil/hq/nsfcc/nsfweb/NSF/onlinedoc.html Both of these should be consulted to ensure an effective and efficient job is done as the LSC.

5120 Logistics Section Planning Cycle Guide

The period of initial response and assessment occurs in all incidents. Short-term responses (small in scope and/or duration and with limited resources working one operational period) can often be coordinated using only ICS Form 201 briefings.

5200 Support Branch

The Support Branch, under the direction of the LSC, is responsible for development and implementation of logistics plans in support of the incident including providing personnel, equipment, facilities, and supplies to support incident operations.

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

5210 Supply Unit

The Supply Unit is primarily responsible for ordering personnel, equipment and supplies. Personnel from USCG will normally come from other MSOs units in the area. Supplies and equipment are ordered through normal agency procurement processes. Pollution response resources are listed below.

Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

5210.1 Oil and Hazardous Substances Response Equipment

Commercial Contractors:

Contractor	Address	Telephone	BOA Contract No.#
C & W Tank Cleaning Inc.	50 North Lallendorf Oregon, OH 43616	(419) 691-1995	DTCG84-99-A-900039
EQ Industrial Services Inc.	3650 Carpenter Rd. Ypsilanti, MI 48197	(734) 677-8822	DTCG84-99-A-900041
Heritage Environmental Services	15330 Canal Bank Rd. Lemont, IL 60439	(630) 739-1151 X208	DTCG84-98-A-800050
Chemtron Corp.	35850 Scheider Ct. Avon, OH 44011	(440) 937-6348	DTCG84-99-A-900038
Inland Waters of Ohio	2195 Drydock Ave. Cleveland, OH 44113	(216)861-3949	DTCG84-98-A-900028
Marine Pollution Control	8631 West Jefferson Detroit, MI 48209	(313) 849-2333	DTCG84-99-A-900040
Philip Services "DBA" Cousins Waste Control	**1801 Matzinger Road Toledo, OH 43612**	**(419) 726-1500**	**DTCG-84-98-A-900035**

USCG Oil Boom:

MSU Toledo	Containment Boom 12" 50' in Response truck Containment Boom 24" 400' in trailer at Station Toledo Containment Boom 27" 1000' in trailer at Station Toledo Containment Boom 30" 225' located at the Sun Oil Dock Containment Boom 43" 600' located at the Sun Oil Dock Absorbent Boom 2 bags Absorbent Pads 2 bags
USCG Station Marblehead	Containment Boom 27" 1000' Pre-stationed in MSU Toledo trailer
MSO Detroit	Containment Boom 27" 2000': 1000' in each trailer
MSO Cleveland	Containment Boom 27" 2000': 1000' in each trailer Containment Boom 18" 2200' Harbor Boom
CCGD9 (DRG)	VOSS with 5000' of 42" Open Sea Boom (Located at Detroit City Airport)

Contractor Oil Boom:

Company	Boom <12"	Boom 12"-24"	Boom >24"	Sorbent Blankets (rolls)	Sorbent Boom (bundles)	Sorbent Pads (bundles)	Sorbent Sweeps (each)
C&W Tank Cleaning 419-691-1995 (24-hr)	3,000'	1,200'	750'	15	100	NO	NO
Clean Harbors 216-429-2401 (24-hr)	No	4,000'	No	No	75	200	No
Phillips Services 419-726-1500 (24-hr)	3,000'	1,250'	750’	15	100	100	100
RMF Global 419-381-1441 (24-hr)	500'	No	No	No	6	12	No
Heritage Environmental 800-377-9886 (24-hr)	No	500'	No	No	75	75	25
Inland Waters 313-841-5800 (24-hr)	500’	7,000'	No	50	150	50	50
Marine Pollution Control 313-849-2333 (24-hr)	2,500'	12,000'	2,000'	No	375	410	30
Marine Towing, Inc. 419-734-2818 (24-hr)	180'	No	No	No	6	3	No
International Technology 419-423-3526 (24-hr)	No	1,100'	1,000’	No	600	600	400
Reliance Environmental 419-867-1994 (24-hr)	No	No	No	No	4	6	No
Inland Waters of Ohio 216-861-3949 (24-hr)	3,275’	2,150'	No	12	20	25	20

Local Industry Resources:

Name	Resources	Phone
BP Oil Co. Toledo Refinery	280' of 28" containment boom 1 boat 2-400 bbl barges 1 desmi weir skimmer	419-698-6400
Sun Co., Inc. Toledo Refinery	350' of 24" containment boom	419-698-6600 (24-hr)
Thompson McCulley Oil Co.	1,000' of containment boom 5 bales of 5" x 10' sorbent boom/oil snare	734-241-1910 (24-hr)

Skimmers:

Name	Resources	Phone
Phillips Services	1 disc, 1 weir	419-726-1500
RMF Global	1 weir (skimpac)	419-381-1441 (24-hr)
Inland Waters Pollution Control	4500 gpm weir	313-841-5800 (24-hr)
C & W Tank Cleaning	3 floating heads	419-691-1995 (24-hr)
Heritage Environmental	2 floating heads	800-377-9886 (24-hr)
International Technologies	4 weir (skimpac)	419-423-3529 (24-hr)
Marine Pollution Control	1 rope skimmer, 1 drum skimmer	313-849-5800 (24-hr)
Inland Waters of Ohio	2 floating heads	216-241-0333

Vacuum Trucks:

Name	Resources	Phone
C & W Tank Cleaning	16 vacuum trucks	419-691-1995 (24-hr)
Clean Harbors of Cleveland, Inc.	5 vacuum trucks: 3,000 - 6,000 gal.	216-881-5008 (24-hr)
Cousins Waste Control Corp.	12 vacuum trucks: 1,200 - 5,000 gal.	419-726-1500
RMF Industrial Services	6 vacuum trucks	419-381-1441 (24-hr)
Heritage Environmental Services	3 vacuum trucks: 2,800 - 3,500 gal.	419-478-4396 (24-hr)
Inland Waters Pollution Control	40 vacuum truck: 3,000 gal 10 trailers: 6,500 gal.	313-841-5800 (24-hr)
Marine Pollution Control	14 vacuum trucks	313-849-2333 (24-hr)
International Technologies	50 vacuum trucks	419-423-3526 (24-hr)
Reliance Environmental Mgmt.	2 vacuum trucks: 2,500 gal	419-867-1994 (24-hr)
Inland Waters of Ohio	8 vacuum trucks: 1,800 - 6,000 gal.	216-241-0333

Federal Sources Aircraft:

Name	Location	Phone	Fax
U.S. Coast Guard	Air Station Detroit	810-307-6700	
U.S. Transportation Command	Scott Air Force Base, Illinois	618-256-8105 (24-hr)	
Air National Guard	180th Tactical Fighter Group 2660 E. Eber Road Swanton, OH 43558	419-868-4078	419-868-4201

Air Ambulances:

Name	Telephone
Advanced Air Ambulance	800-633-3590 (24-hr)
Air Ambulance by Air Response	800-631-6565 (24-hr)
Mercy Med Flights	800-422-2310 (24-hr)

Aircraft Rentals:

Name	Address	Phone
Blue Horizon Flying Club	425 Jefferson Avenue Toledo, OH	419-249-0576
Chrysler Penstar Aviation, Inc.	Oakland Pontiac Airport Pontiac, MI	810-666-3630
Grand Aire Express	390 Airport Road Frenchtown Township., MI	734-457-1730
Seagate Aviation Corporation	11100 Airport Highway Swanton, OH 43558	419-865-8101
Tiffin Aire, Inc	1778 West U.S. Route 22 Tiffin, OH	419-447-4263
Crow Executive Air, Inc	28331 Leymoyne Road Millbury, OH	419-255-2769

National Flight Services, Inc	10971 E. Airport Service Road Swanton, OH 43558	419-865-2311
Toledo Aviation, Inc	Toledo Express Airport West Toledo, OH	419-866-9375

Salvage Companies:

Name	Address	Phone
Marine Towing and Salvage	**232 Heidt Detroit, MI 48217**	**313-842-7511**
Meinke Marine Emergency Services	10815 Corduroy Road Curtice, OH 43412	**419-836-1606**
Marine Towing, Inc	2103 Sand Road Port Clinton, OH	**419-734-2818**
Michigan Marine Salvage, Inc	32475 S. River Road Mt. Clemons, MI	**810-468-2430**
Boaters Emergency Service Inc.	328 N Florence Dr Marblehead, OH 43440	**419-798-5194**

5210.2 Facilities

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

County	Director/Coordinator	Phone
Lucas County EMA	Mr. William Halsey	(419) 213-6503
Wood County EMA	Mr. Jonathan Eric Larson	(419) 354-9269
Ottawa County EMA	Mr. James Greer	(419) 734-6900
Sandusky County EMA	Mr. Mark Smith	(419) 334-6423
Erie County EMA	Mr. William Walker	(419) 627-7617
Monroe (MI) County EMA	Mr. Mitchell Yudasz	(734) 240-3135

Airports/Heliports:

Name	Street	City, State, Zip	Phone
Milan Air Services	19265 Hickort Road	Milan, MI	734-439-7998
Toledo Express Airport	11013 Airport Highway	Swanton, OH 43558	419-865-2351
Fremont Airport	Route 53	Fremont, OH 43420	419-332-8037
Put-in-Bay Airport	1494 Langram Road	Put-in-Bay, OH 43456	419-285-3371
Detroit Metro Airport			734-942-3508
Suburban Aviation, Inc.	Toledo Suburban Airport 4383 Section Road	Ottawa Lake, MI 49267	734-856-6103
Toledo Metcalf Field	28331 Lemoyne Road	Milbury, OH 43447	419-255-2769
Island Air Lines	3255 East State Road	Port Clinton, OH 43452	419-734-6400
Detroit City Airport	11499 Conner	Detroit, MI 48213	313-852-6400

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. The Vessel

Support Unit may also be called upon to arrange fueling, maintenance and repair of vessels on a case-by-case basis. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

Port/Dock/Facilities/Capabilities:
There are numerous facilities in the Western Lake Erie area that handle cargo including general bulk cargo, dry bulk grain, coal, and bulk liquid petroleum products. Most of the vessel support organizations are listed below.

Agents:

Company	Address	Phone
Great Lakes Marine Agencies, Inc.	3332 St. Lawrence Drive Toledo, OH 43605	(419) 691-2902
Hasserodt Shipping	28430 Swan Island Drive Grosse Isle, MI 48138	(734) 671-5700
Tolmar shipping	20500 Eureka Road, Suite 109 Taylor, MI 48180	(734) 691-8796
World Shipping	55 Oak Street River Rouge, MI 48218	(313) 841-0969

Port Authority/Harbormasters:

Name	Address	Phone/Fax
Toledo/Lucas County Port Authority	One Maritime Plaza Toledo, OH 43604-1866	(419) 243-8251 Toledo Express: (419) 865-2351 FAX: (419) 243-1835
Huron Port Authority	Authority P.O. Box 468 Huron, OH 44839	(419) 433-5000
Port of Monroe	2929 E. Front Street P.O. Box 585 Monroe, MI 48161	(734) 241-6840

Boat Ramps/Marinas/Launching Areas:
The Western Lake Erie Area Committee has identified approximately 150 marina and boat launching facilities within the six county region. Information on these facilities, as well as other economically and environmentally sensitive areas, have been surveyed and mapped in a GIS. These data sets area available on CD-ROM from either the U.S. EPA Region 5 or USCG predesignated FOSC. Files are maintained as geo-referenced GIS layers, database, CAMEO/Marplot, and portable document format files. Each member organization of the Area Committee and their extended response and planning network shall have a copy of this CD-ROM maintained with the ACP. It is also available online at: http://www.umesc.usgs.gov/epa_atlas/overview.html

Diving Companies:

Name	Address	Phone
Sea Side Diving, Inc.	28612 Harper St. Clair Shores, MI	(810) 772-7676
Commercial Diving & Marine Services	317 Rawling Port Huron, MI	(810) 987-8898

Dock Operators:

Dock and Location (River East)	Operator	Length	Water Depth	Phone
CSX Toledo Lakefront Docks Torco Slip #1 Mouth of the Maumee 41°41'00"N, 83°25'55"W	Toledo Ore Co. P.O. Box 8096 Toledo, OH 43605	East: 1,300/400 West: 1,815 ft	28 ft	(419) 697-2307
CSX Toledo Presque Isle #1 Mouth of the Maumee 41°41'40"N, 83°27'30"W	Toledo Ore Co. P.O. Box 8096 Toledo, OH 43605	East: 1,760 ft West: 1,398 ft	28 ft	(419) 697-2307
CSX Toledo Presque Isle #2 Mouth of the Maumee 41°41'38"N, 83°27'39"W	Toledo Ore Co. P.O. Box 8096 Toledo, OH 43605	East: 1,993 ft West: 1,124 ft	27 ft	(419) 697-2307
Toledo World Industries Above the Coal Docks 41°41'19"N, 83°28'08"w	Toledo World Ind. 3319 St. Lawrence Toledo, OH 43605	4,100 ft	27 ft	(419) 698-8171
BP Oil Co. Toledo Refinery Marine Dock 800' above CSX bridge 41°40'50"N, 83°28'55"W	BP Oil Co. 4001 Cedar Pt Rd. Toledo, OH 43694	257 ft	21 ft	(419) 698-6200
Sun Oil Dock 100' below Craig Memorial Bridge 41°39'34"w, 83°30'35"W	Sunoco Mid-America Refining 1641 Front street Toledo, OH 43605	918 ft	18-27 ft	(419) 697-6431
ADM Countrymark 41°37'33"N 83°31'59"W	ADM Countrymark 1308 Miami Street Toledo, OH	1,790 ft	27 ft	(419) 691-7480
Equilon - west bank above CSX RR bridge. 41°40'31"N, 83°30'40"w	Equilon Enterprises 2844 Summit St. Toledo, OH 43611	527 ft	18 ft	(419) 726-9741
ARMS/Criscione - below Craig Memorial Bridge 41°30'40"N, 83°39'46"W	Arms Dock Co. 1800 Water St. Toledo, OH 43612	675 ft	23 ft	(419) 726-3942
City of Toledo - Salt Dock 0.4 mi. above Craig Memorial Bridge 41°39'30"N, 83°31'11"W	Toledo Dept. of Bridges, Streets, Harbors 1189 Central Ave Toledo, OH 43610	1,280 ft	23 ft	(419) 936-2508
LaFarge Corp. - foot of Locust St. 41°39'30"N, 83°12'38"W	LaFarge Corp. 840 Water St. Toledo, OH 43604	1,061 ft	18-22 ft	(419) 241-5256
Andersons-0.7 mi above Anthony Wayne Bridge 41°37'52"N 083°12'38"W	The Anderson's 1200 Dussel Dr. Maumee, OH 43537	1,030 ft	27 ft	(419) 897-6000
Kuhlman Corp. Adjacent to Anderson's 41°37'40"N, 83°32'12"W	Kuhlman Corp. 650 Beaver Creek Cir. Maumee, OH 43537	660 ft	27 ft	(419) 897-6000
Detroit Edison Monroe, MI	DTE Energy 2000 2nd Ave	1,600 ft	21 ft	(734) 384-2231

at River Mouth	Detroit, MI 48226			
Dock 1 Monroe, MI	Monroe Port Comm. 2929 E Front Street Monroe, MI 48161	1,200 ft	18 ft	(734) 241-6480
Thompson McCully Corp Monroe, MI Turning Basin	Thompson McCully Oil 3125 Front St. Monroe, MI 48161	600 ft	21 ft	(734) 241-1910
LaFarge Marblehead, OH 1 mi WNW Point Marblehead	LaFarge 522 Limestone Dr. Marblehead, OH 43444	600 ft	25 ft	(419) 798-4486
Kellstone Kelley's Island	Kellstone Inc. P.O.Box 391 Kelleys Is., OH 43438	900 ft	20 ft	(419) 746-2396
Sandusky Docks Sandusky, OH	Sandusky Dock CO. P.O. Box 899 Sandusky, OH 44870	3,490 ft	25 ft	(419) 626-1214
Gradel Docks Sandusky, OH	Geo. Gradel Co. 957 Front Street Toledo, OH 43605	188 ft	22 ft	(419) 691-7123
Peavey Huron, OH	Peavey/Con-Agra	832 ft	28 ft	(419) 433-4900
Burdick Huron, OH	Burdick Grain Co. P.O. Box 458 Huron, OH 44839	832 ft	28 ft	(419) 433-4900
Huron Lime Dock Huron, OH	Huron Lime Co. P.O. Box 146 Huron, OH 44839	725 ft	28 ft	(419) 433-2141

Fueling Facilities:

Name	Address	Phone
Advantage Tank Lines	1929 E. Manhattan Toledo, OH 43605	(419) 729-4880
Phillips Services	1701 E. Matzinger Road Toledo, OH 43612	(419) 726-1500
Warner Petroleum, Inc.	2480 S. Clare Avenue Clare, MI 48617	(517) 386-4350 (24-hr)
Seaway Fuels	2925 Airport Highway Toledo, OH 43609	(419) 389-8725
Stahly Cartage Company	119 S. Main Street Edwardville, IL 62025	(618) 656-5071 (618) 656-8677 (815) 741-1216

Marine Surveyors:

Company	Address	Phone
ABS Americas	3000 North Summit Street Toledo, OH	(419) 729-5225
APAC 1, Inc.	1837 West Alexis Road Toledo, OH	(419) 480-1837
BACHE Marine Consulting	1218 5th Street Sandusky, OH	(419) 626-6393

Captain Ted Polgar	2745 Pine Knoll Drive Toledo, OH	(419) 841-3600
Davis & Company, Ltd.	3178 North Republic Blvd. Sylvania, OH	(419) 841-8606
Davis & Company, Ltd.	5403 North Summit Street Toledo, OH	(419) 727-3805
Great Lakes Marine Surveyors Inc.		(440) 946-1111

Wildlife Rescue Organizations:

Name	Address	Phone
Natures Nursery (Dave Cooper)	11611 Reed Road Whitehouse, OH	419-877-0060
Tri-State Bird Rescue Research	Oppossum Hollow Road Newark, DE 19711	302-737-7241 800-710-0695/0696

Volunteer Organizations:

Organization	Address	Phone
Lucas County, OH American Red Cross	2275 Collingwood Blvd. Toledo, OH	(419) 248-3331 (24-hr)
Salvation Army	620 N. Erie St. Toledo, OH	(419) 241-1138
Monroe County, MI American Red Cross	Monroe MI 48161	(734) 289-1481 (734) 289-1783
Salvation Army, Emergency Assistance	1018 E. 2nd St. Monroe MI 48161	(734) 241-0440
Civil Air Patrol	12887 S. Telegraph LaSalle, MI 48145	(810) 682-5508
Ottawa County, Ohio American Red Cross Mobile Meals of Port Clinton		(419) 734-1100
Salvation Army	Port Clinton Police	(419) 732-2769
Erie County, Ohio American Red Cross		(419) 626-1641
Salvation Army		(419) 626-3862
Wood County, Ohio American Red Cross		(419) 352-4575
Salvation Army		(419) 352-5918
Sandusky County, Ohio American Red Cross		(419) 352-5574
ARES		(419) 332-5932

Laboratories:

Name and Address	Time Frame	Sample Size	# of Samples Required	Phone/Fax
B.E.C. Labs, Inc. 705 Front St. Toledo, OH 43605	2 weeks	8 oz.	8	(419) 693-5307 Fax: (419) 691-1227
International Technologies 16406 U.S. Route 224 East Findlay, OH 45840	10 working days	8 oz.	8	(419) 423-3526 Fax: (419) 424-4998
FOHC	10 working	8 oz.	8	(419) 891-9950

1721 Indianwood Cir. Maumee, OH 42537	days			Fax: (419) 891-9960
Midwest Analytical Services 2727 Second Ave. Detroit, MI 48201	10 working days	8 oz.	8	(313) 964-3680 Fax: (313) 964-2339
Jones and Henry Labs 2567 Tracy Road Northwood, OH 43619	10 working days	8 oz.	8	(419) 666-0411 Fax: (419) 666-1655

Portable Restrooms:

County	Name	Location	Phone
Lucas	ABS Services, Inc	Toledo, OH	(419) 867-8516
	Bill Roberts Sewer Services	Ottawa, OH	(419) 523-4138
	C & L Sanitation, Inc.	Toledo, OH	(419) 874-4653
Monroe	ACEE Deucee	Carlton, MI	(734) 241-3133
	C & L Sanitation, Inc.	Toledo, OH	(419) 874-4653
	Serv-All	Carlton, MI	(734) 654-8855
Ottawa	C & L Sanitation, Inc.	Toledo, OH	(419) 874-4653
	Garner's Northern Ohio	Sandusky, OH	(419) 625-8764
Erie	Garner's Northern Ohio	Sandusky, OH	(419) 625-8764
	Frank Fox & Sons	Sandusky, OH	(419) 625-7872

Staging Areas:

See Section 3500 for more information.

Temporary Storage and Disposal Facilities (TSDs):

Name	Address	Oil Storage Capacity	Daily Processing Capacity	Phone
DISC Environ-mental	151 E. Andrus Northwood, OH 43619	20,000 gal. #2 fuel oil 20,000 gal. Asphalt 33,000 gal. Slop oil 41,000 gal. Waste oil	50,000 gal.	(419) 691-3451 (24-hr.)
BBC Environ-mental	1801 E. Matzinger Toledo, OH 43612	8,800 gal. (4 tanks) 15,000 gal. (4 tanks) 10,000 gal. (3 tanks) (can't except heavy oils)	25,000 gal.	(419) 726-1500 (24-hr.)

Ship's Maintenance Facilities:

Name	Location	Floating	Graving	Phone
Great Lake Towing Company	Cleveland, OH	90' x 36' O.A. dimensions		(216) 621-4854
Fraser Shipyards, Inc.	Superior, WI		#1-600' x 60' O.A. #2-800' x 80' O.A. #3-131' x 80' O.A.	(715) 394-7787
Toledo Ship & Repair Co.	Toledo, OH		#1-550' x 72' O.A. #2-819' x 77' O.A.	(419) 698-8081
Nicholson Terminal Dock	Detroit, MI	160' x 52' O.A.		(313) 842-4300
Bay Shipbuilding Corp.	Sturgeon Bay, WI	604' x 70' O.A	#1-220' x 40' O.A. #2-1,158' x 140' O.A.	(414) 743-5524

Harbor Tugs:

Name/Address	# of Tugs	HP	Phone
Gaelic Tug Boat Co. P.O. Box 114 Grosse Ile, MI 48138	5	1,800-2,250	(734) 841-9440
Great Lakes Towing Co. 1800 Terminal Tower Cleveland, OH	8	1,000-2,000	(800) 321-3663 (24-hr.)
Great Lakes Towing Co. Detroit, MI	4	1,200-2,000	(800) 321-3663
Great Lakes Towing Co. Toledo, OH	3	1,200-1,400	(800) 321-3663
William W. Stender 1700 Evergreen Drive Bay City, MI 48706	1	318	(517) 684-4020 (24-hr.)
Malcom Marine 1159 Fred Moore Hwy. St. Clair, MI 48177	2	2,000	(810) 329-9013

Vessel/Boat Sources:

Name	Work Boat Lengths			Phone
	<25'	25'-50'	>50'	
C & W Tank Cleaning	2			(419) 691-1995 (24-hr)
Clean Harbors of Cleveland, Inc.	2			(216) 881-5008 (24-hr)
Cousins Waste Control Corp.	2			(419) 726-1500
Heritage Environmental Services	2			(419) 478-4396 (24-hr)
Inland Waters Pollution Control	4	1		(313) 841-5800 (24-hr)
Marine Pollution Control	6	1		(313) 849-2333 (24-hr)
Marine Towing, Inc.		5		(419) 734-2818 (24-hr)
International Technologies	5	38		(419) 423-3526 (24-hr)
Meinke Marine Emergency Services	1	5		(419) 836-1606
Reliance Environmental	1			(419) 867-1994 (24-hr)
Inland Waters of Ohio	4		1	(216) 241-0333
BP Oil Co. Toledo Refinery	2			(419) 698-6400
Sun Company, Inc. Toledo Refinery	1			(419) 698-6600 (24-hr)
Thompson McCulley Oil Co.	1			(734) 241-1910 (24-hr)

5240 Ground Support Unit

The Ground Support Unit is primarily responsible for support of service resources, coordination of transportation of personnel, supplies, food, and equipment; fueling, service, maintenance and repair of vehicles and other ground support equipment, and implementing the Traffic Plan for the incident.

5300 Service Branch

The Service Branch, under the supervision of the Logistics Section Chief, is responsible for the management of all service activities at the incident, including communications, medical, and

food units.

5310 Food Unit (For Responders)

The Food Unit is responsible for determining feeding requirements at all incident facilities. Food Suppliers are too numerous to list here. The local phone directory can provide all the major food suppliers in the local area. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

5320 Medical Unit (For Responders)

The Medical Unit is primarily responsible for the development of the Medical Emergency Plan, obtaining medical aid and transportation for injured and ill incident personnel, and preparation of reports and records. The Medical Unit may also assist Operations in supplying medical care and assistance to civilian casualties at the incident, but is not intended to provide medical services to the public.

Medical Facilities:

Name	Address	Phone
Toledo Hospital	2142 N. Cove Blvd., Toledo, OH 43606	(419) 291-4000
Riverside Hospital	1600 N. Superior, Toledo, OH 43604	(419) 729-6000
Medical College of Ohio	3000 Arlington Ave., Toledo, OH 43614	(419) 383-3888 (419) 381-4200
St. Lukes Hospital	5901 Monclova, Maumee, OH 43537	(419) 893-5920 (419) 893-5907
St. Charles Hospital	2600 Navarre Ave., Oregon, OH 43616	(419) 696-7200 (419) 698-7300
Flower Hospital	5200 Harroun Rd., Sylvania, OH 43560	(419) 824-1444
St. Vincent Hospital	2213 Cherry St., Toledo, OH 43608	(419) 251-3232 (419) 321-4354
Mercy Hospital	718 N. Macomb, Monroe, MI	(734) 241-1700
Herrick Memorial	500 E. Pottowatamie, Tecumseh, MI 49286	(517) 423-2141
St. Joseph Mercy Hospital	900 Woodward Ave., Pontiac, MI 48341	(810) 858-3000
Wyandotte General Hospital	2333 Biddle Ave., Wyandotte, MI 48192	(734) 284-2400
Heritage Hospital	10000 Telegraph Rd., Taylor, MI 48180	
St. Joseph Mercy Hospital	65301 E. Huron River Dr., Ann Arbor, MI 4928	(734) 712-3456
Magruder H.B.Memorial Hospital	615 Fulton St., Port Clinton, OH	(419) 734-3131
Firelands Community Hospital	1101 Decatur St., Sandusky, OH	(419) 626-7455
Providence Hospital Sisters of St. Francis	1912 Hayes Ave., Sandusky, OH	(419) 621-7000

Ambulance Services:

Name	Location	Phone
Brookeside Ambulette	Toledo, OH	(419) 269-0332
Medcorp Inc.	Toledo, OH	(419) 727-7000
Medcorp Inc.	Toledo, OH	(419) 385-2111
Mobile Medic Ambulance	Toledo, OH	(419) 693-1611
Promedica Regional Transportation System	Toledo, OH	(419) 471-4394

RSVP	Toledo, OH	(419) 269-7787
Rumpf-Brookeside ambulance	Toledo, OH	(419) 476-7442
Non-Emergency Transport Service	Erie, MI	(734) 457-1000
Tom Louy Ambulance	Waterville, OH	(419) 878-7744
Ottawa Ambulance Inc.	Oak Harbor, OH	(419) 898-9111
North Central EMS	Huron, OH	(419) 433-4620

5400 Communications Unit

The Communications Unit is responsible for developing a Communications Plan for the effective use of communications equipment and facilities. Additional information regarding this position under ICS can be found in the USCG Incident Management Handbook (April 2001).

Channel	Frequency	Comments
Marine Band Channel 81A	157.075 MHz	The primary MSO operating frequency. 81A is also the national marine pollution response coordination. In addition this channel is the primary means of radio communication between MSO, field teams, and contractor teams in pollution cases.
Marine Band Channel 83A	157.175 MHz	This is the USCG Auxiliary primary operating channel. COTP may preempt the use of this channel in emergencies.
Marine Band Channel 22A	157.100 MHz	This is the primary USCG public liaison channel. Urgent marine broadcasts are announced on Channel 16 and are broadcast on Channel 22A. During a pollution case 22A may be used by USCG Stations to inform mariners of hazardous conditions or restrictions on the waterways.
Marine Band Channel 16	156.800 MHz	This is the international hailing and distress frequency. In a pollution case, 16 may be used by USCG Group to alert mariners to urgent COTP information on channel 22A. Only in the most extreme cases would MSO broadcast information directly on channel 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	These are USCG Operational channels and are controlled by the Group Commander. During a pollution case or marine incident, information would be exchanged on these channels and relayed to MSO, unless conditions sufficiently urgent to require direct COTP use.

5410 State and Local Communications Capabilities

Monroe County, Michigan:

Organization	Frequency	Band
Fire Department	154.430	MHZ VHF
Fire Ground	154.355	MHZ VHF
DNR State-Wide Fire	154.355	MHZ VHF
County Sheriff	460.175	MHZ UHF
Monroe City Police	460.150	MHZ UHF
Emergency Management Division	158.955	MHZ VHF
Road Commission	37.98	MHZ VHF/Low Band

State Police Base	42.58	MHZ VHF/Low Band
State Police-Car	42.74	MHZ VHF Low Band
Lenawee County Sheriff	155.565	MHZ VHF
E.M.T.S Ambulance	155.235	MHZ VHF
Jackson EMS	155.175	MHZ VHF
EMS	462.975	MHZ UHF
Weather Service Detroit	162.550	MHZ VHF
Monroe Dept of Public Works	155.880	MHZ VHF
Mercy Memorial (Hear System)	155.340	MHZ VHF
Detroit City Fire Department	154.370	MHZ VHF

Lucas County, Ohio:

Organization	Frequency	Department
Emergency Management EOC	33.740 MHZ 33.860 MHZ 154.935 MHZ 155.340 MHZ 460.400 MHZ 462.950 MHZ	Most County Fire and EOC Lucas County Fire Dept. LEERN County Hospital/Life Flight County Law Enforcement County Wide EMS
Holland Village Fire Department	155.340 MHZ	Emergency Medical
Jerusalem Township VFD	453.800 MHZ 460.600 MHZ	All JVFD
Lucas County EMS	462.950 MHZ 118.100 MHZ 130.925 MHZ 154.190 MHZ 460.400 MHZ 460.475 MHZ	EMS Toledo Tower Toledo National Flight Toledo Fire Division Lucas Co. Law Enforcement Police/Engineer & EOC
Maumee Police and Fire	154.205 MHZ	All Police/Fire Units
Monclova Township Fire Department	453.450 MHZ	All Monclova Fire Units
Oregon Police and Fire	460.075 MHZ 460.100 MHZ	All Oregon Fire Units Police Mobile Dispatch
Ottawa Hills Police and Fire	453.275 MHZ 460.025 MHZ	Ottawa Hills Fire Ottawa Hills Police
ARES Volunteer Radio	146.010 MHZ 146.340 MHZ	
American Red Cross	464.700 MHZ	American Red Cross
Richfield/Berkey Township	154.190 MHZ	Richfield/Berkey Units.
Springfield Township Fire	460.625 MHZ	Springfield Fire Units
Sylvania City Police	460.050 MHZ	Sylvania Police Units
Sylvania Township	465.575 MHZ 453.575 MHZ 460.575 MHZ	Sylvania Township Fire Sylvania Township Police Sylvania Township Police
Toledo Police and Fire	154.190 MHZ 460.400 MHZ	Toledo Fire and EOC Toledo Police Units
Waterville Police and Fire	453.200 MHZ 460.475 MHZ 453.200 MHZ 460.500 MHZ	Waterville/Maumee Fire Waterville Fire Units Waterville Police Units Waterville Police Units
Whitehouse Volunteer Fire	154.355 MHZ	Whitehouse Volunteer Fire

Ottawa County, Ohio Radio Frequencies:

Organization	Frequency	Band
Allen Township Fire Dept.	807.5125 MHZ	UHF

Bay Township Fire Dept.	807.5125 MHZ	UHF
Catawba Island Fire, EMS, Police	807.5152 MHZ	UHF
Clay Center Fire, EMS, Police	807.5125 MHZ	UHF
Clay-Genoa Fire & EMS	807.5125 MHZ	UHF
Harris-Elmore Fire and EMS	807.5125 MHZ	UHF
Lakeside Fire, EMS, Police	807.5125 MHZ	UHF
Marblehead Fire, EMS, Police	807.5125 MHZ	UHF
Port Clinton Fire, EMS, Police	807.5125 MHZ	UHF
Put-in-Bay Fire, EMS, Police	807.5125 MHZ	UHF
Clay Township Police	807.5125 MHZ	UHF
Danbury Police	807.5125 MHZ	UHF
Elmore Police	807.5125 MHZ	UHF
Genoa Police	807.5125 MHZ	UHF
Ottawa County Sheriff	807.5125 MHZ	UHF
Oak Harbor Police	807.5125 MHZ 453.350 MHZ	UHF UHF
Ohio State Highway Patrol #22	807.5125 MHZ	UHF
Rocky Ridge Police	807.5125 MHZ	UHF
Portage Fire	454.600 MHZ	UHF
Mid-County EMS	454.600 MHZ	UHF
Carroll Township Fire & EMS	454.600 MHZ	UHF
Rocky Ridge Fire	454.600 MHZ	UHF
Erie Township Fire	454.600 MHZ	UHF
Carroll Township Police	453.250 MHZ	UHF

Erie County, Ohio Radio Frequencies;

Organization	Frequency	Band
Ohio State EMA	155.805 MHZ 154.100 MHZ	VHF VHF
State Law Enforcement	155.370 MHZ	VHF
Erie County Sheriff	158.730 MHZ 39.58 MHZ 39.44 MHZ 458.950 MHZ	VHF VHF/Low Band VHF/Low Band UHF
Ohio State Fire Marshal	154.280 MHZ	VHF
LEERN	154.930 MHZ	VHF
County EMS	155.340 MHZ	VHF
Civil Air Patrol	148.150 MHZ	VHF
Perkins Police	39.24 MHZ	VHF/Low Band
Sandusky Fire	460.575 MHZ	UHF
Sandusky Police	460.250 MHZ	UHF
Kelley's Island Police	460.4875 MHZ	UHF
Weather	162.400 MHZ	VHF
Cedar Point	461.300 MHZ	UHF

Sandusky County, Ohio Radio Frequencies;

Organization	Frequency	Band
Ballville Fire Department	46.06 MHZ	VHF/Low Band
Bellevue Fire	46.06 MHZ	VHF/Low Band
Bettsville Fire Department	46.06 MHZ 46.16 MHZ	VHF/Low Band VHF/Low Band
Bradner Fire	153.089 MHZ	VHF/Low Band

Clinton Township Fire	46.06 MHZ	VHF/Low Band
Clyde Fire Department	46.06 MHZ	VHF/Low Band
Fremont Fire Department	46.06 MHZ	VHF/Low Band
Gibsonburg Fire Department	46.06 MHZ	VHF/Low Band
Green Springs Fire Dept.	46.06 MHZ	VHF/Low Band
Helena Fire Dept.	46.06 MHZ	VHF/Low Band
Kansas Fire Dept.	46.06 MHZ	VHF/Low Band
Lindsey Fire Dept.	46.06 MHZ	VHF/Low Band
Old Fort Fire Dept.	46.06 MHZ	VHF/Low Band
Rising Sun Fire Dept.	46.06 MHZ	VHF/Low Band
Sandusky Township Fire	46.06 MHZ	VHF/Low Band
Townsend Fire Dept.	46.06 MHZ	VHF/Low Band
Woodville Fire Dept.	46.06 MHZ	VHF/Low Band

Wood County, Ohio Radio Frequencies:

Organization	**Frequency**	**Band**
Wood County Fire	153.890 MHZ 154.220 MHZ 154.415 MHZ 154.280 MHZ	VHF VHF VHF VHF
Local Government (Main)	155.820 MHZ	VHF
Local Government (mobile)	158.940 MHZ	VHF
Wood County Sheriff	155.370 MHZ 155.070 MHZ 156.030 MHZ	VHF VHF VHF

Other Communications Capabilities:

Communications System	Comments
Portable Communication Trailers	Transportable Communications Central (TCC) units are self contained, pre-positioned, 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 gasoline generator. Procurement/Support of the TCC shall be requested via CCGD9 (Dt) (216) 902-6035 (24-hr). The Chief Telecommunications Section will coordinate the assignment of a TCC, through MLCLANT area and assist in the assignment of radiomen for the TCC. Further guidance is provided in CCGD9 Instruction M2000.1. (Ninth District Telecommunications Plan)
Telephones (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. They may request emergency conferences at any time, but should provide one-day advance notice whenever possible. In addition, FEMA has a dedicated teleconference system capable of handling additional participants. Contact the Response and Recovery Division of FEMA Region 5 at

	(312) 408-5369
Pagers	FOSCs, their representatives, and many of the state and local response organizations have been issued pagers. They have a wide area of coverage within the Western Lake Erie coastal and inland zones. The pagers are the primary method of contacting these personnel when they are not in the office or at home.
Telefax	Fax transmission by phone line is an excellent way to exchange complex information quickly and accurately, particularly between response agencies, technical experts, other appropriate agencies, and private companies. Most agencies have a dedicated fax line and machine.
Computer Communications System	E-mail allows direct and succinct information to be communicated to almost all individuals and agencies at any time. Files, data, photos, and other information can be attached to standard messages. Nearly all response agencies and organizations have e-mail capabilities. Utilizing this form of electronic communication eliminates back-ups and busy signals on fax and phone lines; multiple communications can be forwarded simultaneously; and with most systems, transfer is close to real-time.
Portable Telephones	Portable telephones are another practical communication tool that allow the passage of information from remote or difficult sites to individuals relying on that data for further response strategies. Though not everyone at a response scene may have portable telephones, planned sharing or temporary activation of rented "cell phones" is a viable activity at the initiation of response.

5420 Communications Support

Unit or Activity	**Phone**
Ninth Coast Guard District Communications Center	(216) 902-6031
COMLANTAREA	(757) 398-6231
ESU Cleveland	(216) 902-6174 (Telecomms)
TISCOM	(800) 847-2479
Atlantic Strike Team Communications Trailer	(609) 724-0008/0009

5430 Communications Facilities

NOTE: Other personnel and services not listed here should be included as an appendix "pull-out" or hyperlink

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6000 Finance/Administration

6100 Finance/Administration Section Organization

The following is an organization chart of the Finance/Administration Section and its subordinate Units. It serves as an example and is not meant to be all-inclusive

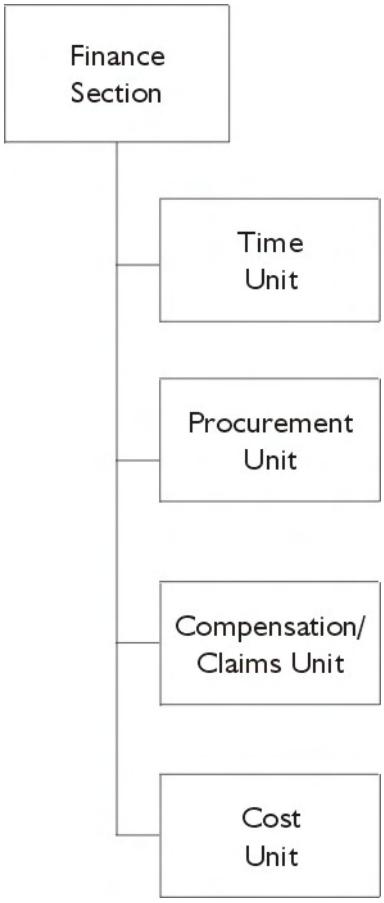

Figure 6100.1, Finance Section

6200 Finance/Administration Section Chief

The Finance Section Chief is the primary financial advisor to the Incident Commander and overseas the operation of the Finance/Administration Section.

In Addition, if the response is not funded by the RP the Finance/Administration Section will ensure contractors are paid in a timely fashion so as not to interrupt response operations; process and pay claims and reimburse the response costs of government agencies as appropriate. The Finance/Administration Section Chief may also request assistance from the NPFC for claims processing.

6300 Oil Spill Liability Trust Fund Access

Refer to the National Pollution Funds Center's *User Reference Guide* for detailed procedures on how to access the OSLTF: www.uscg.mil/hq/npfc/Publications/index.htm and see Appendix H in this document (Appendix B in the *User Reference Guide*).

6310 FOSC Access

The OSLTF and the CERCLA are administered by the NPFC on behalf of the Commandant, USCG for response to oil and hazardous material discharges. If a determination is made that activation by the FOSC is required, the Fund(s) is/are available to pay the direct allowable response cost authorized by the FOSC that falls under the NCP Phase III operations, which includes containment, countermeasures, cleanup, and disposal action to prevent, minimize, or mitigate threat(s) to public health or welfare or the environment. The Fund can reimburse appropriate and reasonable response costs, authorized in advance by the FOSC that has been incurred by federal and state agencies. For guidance on operating procedures for determining removal costs for both OSLTF and CERCLA, refer "Ways to Access Federal Funds" in the FFARM (August 1999).

6310.1 National Pollution Funds Center (NPFC)

The FOSC can access Federal Project or CERCLA numbers (FPN or CPN) online through CANAPS (Ceiling and Number Assignment Processing System) to electronically establish Federal Project numbers and budget ceilings for pollution response. The NPFC Regional Manager for the Great Lakes region can be accessed via the following numbers:

Business Hours/Case Management..... (800) 358-2897
Command Duty Officer/After Hours,
Weekends or Holidays ..... (800) 759-7243 pin 2073906

The OSLTF, administered by the Commandant, USCG, was established pursuant to Section 9509 of the Internal Revenue Code of 1986 (20 U.S.C. 9505) for response to oil discharges. Only responses to discharges specifically analyzed and constituted of oil alone are eligible for OPA OSLTF funding. The OSLTF can reimburse appropriate and reasonable response cost, authorized in advance by the FOSC, which has been incurred by federal and state agencies.

6320 State Access

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 (40 CFR 300). 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 Part 133) to implement the provisions of section 1012(d)(1) of OPA 90. Refer to Chapter 5 of the "NPFC User Reference Guide" for

detailed procedures for state access to the fund. In addition, the state can also access the OSLTF through a contractual relationship with the FOSC.

When the FOSC determines that another agency (federal, state, local or Indian tribe) 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 Pollution Removal Funding Authorization (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. Refer to the "NPFC User Reference Manual," Chapter 5 for detailed procedures for state access to the fund.

6330 Trustee Access

The Lead Administrative Trustees should request funding from the RP unless the RP is unknown, or contacting the RP is not feasible due to time constraints. The FLAT should submit a request for initiation of a NRDA on behalf of all of the affected natural resource trustees to the cognizant NPFC Regional Manager. Please refer to "NPFC User Reference Guide," Chapter 6 for a more detailed discussion on trustee access to the OSLTF.

6400 Cost

The Cost Unit tracks response costs against the assigned 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. The Cost Unit is responsible for reporting amounts spent and ceiling remaining. They work with Finance Center to record response costs in the USCG official accounting records and process payments for contractors, other government agencies, and other purchases.

6410 Cost Documentation Procedures, Forms & Completion Report

Refer to the "Phase IV – Documentation and Cost Recovery" in the FFARM (August 1999) and the "NPFC User Reference Guide" for detailed information on cost documentation procedures.

6500 Time

The Time Unit is responsible for monitoring all manpower hours allocated to an incident response. The Operations Section in keeping daily resource reports aids them in this activity.

6600 Compensation/Claims

This Compensation/Claims Unit handles "insurance" related matters. It manages any medical costs, death benefits, and personnel claims. It also manages the OPA 90 claims functions when the RP is not handling claims. Specific guidance on Compensation/Claims Unit functions can be found in the FOSC Financial Functions Section of the "NPFC User Reference Guide".

6700 Procurement

The Procurement Unit is typically located in the Finance/Administration Section or sometimes in the Logistics Section. This unit is staffed with procurement specialists. The Atlantic Area Maintenance and Logistics Command provides contracting assistance, as necessary. This unit is responsible for issuing Authorizations to Proceed for BOA Contractors and negotiating contracts with commercial contractors to perform activities as required by the FOSC. They will conduct cost and price analyses as necessary to determine reasonable costs and review and approve invoices from contractors.

6710 Contracting Officer Authority

For response to oil discharge incidents, the FOSC has discretion to allocate a cost ceiling of $25,000, against the OSLTF. To increase the obligated ceiling, contact the USCG District 9 Marine Safety staff to have the ceiling increase appropriately to cover the following costs:

- Government costs
- Contractor costs
- Other Agency costs

For Response to a Hazardous Materials Release incident, the USCG 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 U.S. EPA. More detailed information can be found in the following references:

- NPFC
- NPFC FFARM
- USCG Cost Documentation Forms and Incident Report (Excel Spreadsheet)
- USCG Marine Safety Manual, Volume IX, Marine Environmental Protection Manual.

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7000 Hazardous Substances Unique Information

7100 Command

As with all other spills or releases, all area fire departments will operate under an ICS at all hazardous materials incidents. The command structure at all hazardous materials incidents is required to include the IC and a Safety Officer. The first unit arriving on scene shall establish the CP. The primary objective of the first arriving crew is to identify the materials involved, from a safe distance.

7200 Operations

7210 Initial Emergency Notification

Any person discovering a hazardous materials incident should report the incident by calling a 24-hour number (*i.e.*, 9-1-1) of the local fire department of jurisdiction. See **Ref. Sec. 5210.1** of this plan for listing of fire department numbers. In addition, the federal National Response Center shall be notified immediately upon discovery as well as the response numbers for each state that is impacted by the spill, as follows:

National Response Center: (800) 424-8802
State of Ohio: (800) 282-9378
Michigan Pollution Emergency Alert System: (800) 292-4706

- The Incident Commander of a fire department with jurisdiction will determine the HAZMAT response level for each event.

- Judgment of the Community Emergency Coordinator and Incident Commander shall be used regarding notification to surrounding fire jurisdictions, National Weather Service, hospitals, public works departments, community officials, State Fire Marshall, etc. Each hazardous material fixed facility is responsible for reporting conditions that fall within the parameters of the response levels.

    1. If an uninvolved third party reports a spill, you must ask the following additional questions to learn as much as possible about the hazard with which you are dealing.

        (a) Is there obvious physical damage or ill health effects apparent? Is anyone experiencing symptoms due to the spill (headache, nausea, eye irritation?)

        (b) What does the substance look like - color, consistency, etc.?

        (c) Aroma/distinctive smell/vapors - Ask only if they noticed an aroma/smell/vapors. Do not ask a person to check for a smell.

        (d) What does the area look like?
        - Is it residential or industrial?
        - Is it remote?
        - What landmarks are near?
        - What cross roads are near, if known?

- Directions to incident.
- Estimate of population density.

2. When notified by the **"RESPONSIBLE PARTY"**, get the following additional information:

(a) Do you have the pertinent Material Safety Data Sheet (MSDS)? If so, can you FAX to the unit?

(b) Are there any other substances present that might react with the discharge product?

(c) Does the discharge product react with water?

(d) Who are the "on scene" personnel and who is in charge?

(e) What "on scene" equipment is available?

(f) Is there a Safety Supervisor?

(g) What is the area like?
- Is it residential or industrial?
- Is it remote?
- What landmarks are near?
- What cross roads are near (if known)?
- Directions to incident
- Estimate of population density

(h) Any additional information?

(i) Directions to the discharge location?

7220 Tactical Response Options

Initial Response - Upon responses to Hazardous Material Incident, the fire department will endeavor to take actions deemed necessary to save lives, prevent injuries, reduce property loss, and restore vital services. The Incident Commander employs all available means to alleviate the hazardous condition. For any incident, existing fire department's SOPs and mutual aid agreements shall prevail.

Operational Risk Management – Prior to deploying resources on scene, response organizations shall perform a risk assessment. For Coast Guard led responses, an Operational Risk Management approach will be used to ensure a reasonable effort has been made to identify hazards to responders (see appendix C).

Level I - Potential Emergency Conditions: An incident which can be controlled by first response agencies and does not require evacuation of other than the involved structure or the immediate outdoor area. The incident is confined to a small area and does not pose an immediate threat to life, property, or the environment. During the initial phase of a Level I incident the fire command takes action similar to the following:

- Evaluates incident: Evaluation may require immediate action to rescue or evacuate while recognizing the risk to personnel in relation to available protective equipment
- Assesses any visible activity taking place. Evaluates the effect of wind, topography and locality affected
- Determines the level of the incident
- Evaluates the risk before formulating a plan. Avoids premature commitment of personnel to potentially hazardous areas
- Positions apparatus for quick means of escape
- Establishes command posts, staging and triage locations
- Determines what public action should be taken
- Determines and designates the hazard zones (hot line, contaminated, support zone)
- Initiates public notification, if applicable
- Determines/requests appropriate emergency and support activities
- Determines and directs emergency and support activities
- Maintains overall command of the emergency scene until the hazard is contained and under control or until command can be passed effectively to relief command and/or to an appropriate agency

Level II - Limited Emergency Condition: An incident involving a greater hazard or larger area which poses a potential threat to life, property or the environment and which may require a limited evacuation of the surrounding area.

Level III - Full Emergency Conditions: An Incident involving a severe hazard or large area which poses an extreme threat to life, property and the environment and will probably require a large scale evacuation; or an incident requiring the expertise or resources of county, state, federal or private agencies/organizations.

Level II & III - The fire command may:

- Request apparatus, personnel, and equipment from adjacent jurisdictions
- Request automatic mutual aid stand-by alert
- Identify the hazardous substance if possible and requests the response of appropriate governmental environmental authorities and/or aid and guidance from the manufacturer or other responsible party of the material

7300 Planning

See Section 4000 of this plan, as well as the referenced federal, state, and local hazardous material spill contingency plans.

7400 Logistics

7410 Identification Resources

Oil and hazardous material dispersion models and databases available include the following:

- CHEMTREC: 800-424-9300 (24-hr.)

- Computer-Aided Management Emergency Operations (CAMEO) provides chemical identification and information. CAMEO is available from the National Safety Council at: 630-285-1121

- Automated Data Inquiry of Oil Spills (ADIOS) can project discharge dispersions

- Arial Location of Hazardous Atmospheres (ALOHA) can aid in plume dispersion projections for airborne contaminants. ALOHA is available from the National Safety Council.

- Response Information Data Sheets (RIDS) provides information similar to Material Safety Data Sheets. RIDS is included with CAMEO.

7420 Hazmat Response Resources

All local area response organizations work with the Toledo Fire Dept. for all levels of Hazmat, and Dealing with Weapons of Mass Destruction.

7500 Finance

See Section 6000 of this plan.

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8000 Marine Fire Fighting

8100 Command

The UCS as described in Section 2000 of this plan will be implemented as the command structure for marine fire fighting incidents. The COTP is designated as the FOSC and will be responsible for the response and management of all aspects of the disaster. The local fire department with jurisdiction over the location of the ship or facility will be the IC.

8200 Operations

8210 Initial Response Strategy

The Marine Safety Manual 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 IC for shipboard or waterfront facility fire fighting activities. COTP Toledo 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. COTP Toledo 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.

8211 Operational Fire Fighting Priorities

Operational fire fighting priorities for marine fire incidents are listed below, in order of precedence:

1. Rescue - Life safety must always be the first consideration in any fire or emergency situation. When lives are in danger, the IC must quickly assess whether the situation necessitates immediate removal of personnel, the number of persons that need to be extracted, and the hazards to the rescue team.

2. Exposures - The fire should be fought 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 that 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.

3. 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).

4. 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.

5. 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.

6. 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 the fire's point of origin and source of ignition.

7. 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 fire fighting efforts should not begin until a coordinated attack is staged.

8. Stability - The use of water for fire fighting can significantly raise the center of gravity should be consulted for stability calculations and advice listed below should be initiated at this stage.

8212 Off-Shore Fire Fighting Considerations

In the event of a fire on a vessel in Lake Erie, and the vessel's crew is unable to contain the fire, the USCG may be designated to act as the IC to protect U.S. interests under the authority of the CWA. Since local jurisdiction does not extend into Lake Erie, the USCG will utilize available state, DOD 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. waters and fouling of sensitive fishing areas, wildlife habitats, shorelines, economically important areas, and not creating an obstruction to navigation.

8213 Decision to Allow Burning Vessel to Enter Port

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 Volume VI of the Marine Safety Manual. Additionally, the information concerning mooring, anchorage and grounding sites should be reviewed and considered as part of this decision. A burning vessel is only a small part of the resources that must be protected. Entry into a port or movement within the

port may have to be denied when:

1. There is danger that the fire will spread to other port facilities or vessels.

2. The vessel is likely to sink or capsize within a channel, becoming an obstruction to navigation.

3. The vessel might become a derelict.

4. Unfavorable weather conditions preclude the safe movement of the vessel or would hamper fire fighting (high winds, fog, strong currents, ice, etc.).

8214 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. The COTP shall be consulted prior to moving or setting a burning vessel free. Among the considerations to evaluate in deciding whether to allow a vessel to move within a port are the following:

1. Location and extent of fire.

2. Capabilities/training of the crew.

3. Status of shipboard fire fighting equipment.

4. Class and nature of cargo.

5. Hazards to the environment.

7. Hazards to crew or other resources where vessel is situated.

8. Forecast weather.

9. Maneuverability of the vessel.

10. Effect on bridges under or through which the vessel must transit.

11. Potential for fire to spread to pier or shoreside facilities.

12. Fire fighting resources available shoreside.

13. Consequences/alternatives if the vessel in not allowed to enter port or move. The best facility within the Port of Toledo for fire fighting access is the Toledo World Industries Terminal (TWIT). This facility is located on the lake side of all bridges. This would be a plus when considering bringing a burning vessel into port. TWT has pier side cranes and a sufficiently open pier for access by fire fighting apparatus. Consideration would have to be given at the time of the incident of what cargo might be stored at the facility. Movement of a vessel within the Port of Toledo is severely hampered by the number of railroad and highway bridges crossings and the narrow channel of the Maumee River. The COTP would most likely deny

movement within the Port for this reason.

8300 Planning

See Section 4000 of this plan, as well as federal, state, and local hazardous material spill contingency plans either directly referenced in this document or implied by association of applicability.

8400 Logistics

8410 Marine Fire Fighting Resources

Name	Address	Phone
Fire-X Associates	115 S. Erie Street Toledo, OH	419-241-3430
Federal Fire Equipment	2036 N. Holland-Sylvania Road Toledo, OH	419-531-5164

8410.1 Fire Fighting Foam

Name	Foam	Phone
Sun Oil Company	275 gal. Universal Gold 3% (on hydro-carbonpolar solvents); 90 gal. Aer-O-Foam cold 3% regular protein; 100 gal. 6% HAZMAT (acid); 9,850 gal. XL-3Fluorprotein 3% (1,000 gal. On foam100 gal. % HAZMAT (alkaline); trailer; 25 gal Ansulite 3x3 AR-AFFF 3% (onhydro-carbons); 5 gal. Ansul 6% regular protein; 50 gal. Light Water ATC 3/6%	419-698-6600
BP Oil Company	2,750 gal AFFF 3% (2,000 gal. on trailer, 750gal. on truck); 2,750 gal. Fluorprotein 3% (2,000gal. on trailer, 750 gal. on truck)	419-698-6451
Toledo Express Airport	1,000 gal AFFF 3%	419-865-2351
Toledo Fire Department	300 gal AFFF 3/6%	419-245-1125
Huron Fire Department	50 gal. AFFF 3/6%	419-433-4114
Monroe Fire Department	300 gal. AFFF 3/6%	734-241-1626
Lakeside Fire Department	100 gal. AFFF 3/6%	419-798-5219
Kelleys Island Fire Dept.	40 gal AFFF 3/6%	419-746-2321
Oregon Fire Dept.	1,000 gal 6% protein carried on foam truck	419-698-7019
Port Clinton Fire Dept.	50 gal. AFFF 3/6%	419-734-3121
Marblehead Fire Dept.	100 gal 3% High Expansion; 20 gal. AFFF 3/6%	419-798-4450
Sandusky Fire Dept.	100 gal AFFF 3/6%	419-627-5837
Catawba Island Fire Dept.	115 gal AFFF 3/6%	419-797-2424
Put-in-Bay Fire Dept.	50 gal. AFFF 3%; 50 gal. AFFF 6%	419-285-7805

8410.2 Shipboard Fire Fighting Consultation

Name	Address	Phone
MARAD, Fire Training Center	2600 Eber Road Swanton, OH	419-259-6362

8410.3 Fire Department Listings

County, State	City	Phone
Monroe Co., Michigan	Luna Pier	734-243-7070
	Milan	734-449-2111
	Monroe	734-241-8853
Lucas Co., Ohio	Harbor View	419-691-5787
	Maumee	419-897-7000
	Oregon	419-691-5787
	Ottawa Hills	419-531-4211
	Sylvania	419-882-0022
	Sylvania Township	419-882-0022
	Toledo	419-245-1180
	Waterville	419-878-2036
	Waterville Village	419-243-5111
	Whitehouse	419-877-5131
Ottawa Co., Ohio	Marblehead	419-798-4450
	Oak Harbor	419-898-2033
	Port Clinton	419-734-3430
	Put-In-Bay	419-285-7085
Erie Co., Ohio	Huron	419-433-3544
	Sandusky	419-627-5837
	Vermilion	440-967-4136
Sandusky Co., Ohio	Fremont	419-332-4131
	Woodville	419-849-2222
	Gibsonburg	419-637-2130
	Clyde	419-547-7143
	Bellevue	419-483-2659
	Ballville Township	419-332-0774
	Sandusky Township	419-332-2612
	Townsend Township	419-547-8122
	Washington/Lindsey Township	419-665-2321
	Helena VFD	419-638-2011
	Green Springs	419-639-2222
Wood Co., Ohio	Bloomdale	419-454-3542
	Bowling Green	419-353-5111
	Bradner	419-288-2444
	Center Township	419-352-2112
	Cygnet	419-655-2222
	Dunbridge	419-352-211
	Grand Rapids	419-832-2424
	Haskins	419-823-1111
	Hoytville	419-278-2222
	Jerry City	419-655-2225
	Luckey/Troy Township	419-833-6622
	Millbury	419-666-1221

	Milton Township	419-669-3211
	North Baltimore	419-257-2000
	Northwood	419-693-7231
	Pemberville/Freedom Twsp.	419-287-3232
	Perrysburg	419-874-4321
	Perrysburg Twsp.	419-874-3551
	Portage	419-686-4923
	Rising Sun	419-457-2222
	Rossford	419-666-5230
	Tontogany	419-823-4664
	Walbridge/Lake Twsp.	419-666-1311
	Wanye	419-288-2333
	West Milgrove	419-288-2803
	Weston	419-669-3232
Hancock Co., Ohio	Findlay	419-424-7129
Huron Co., Ohio	Norwalk	419-668-3333
Seneca Co., Ohio	Tiffin	419-448-5444

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9000 Appendices

9100 Draft Incident Action Plan

The IAP typically, and at a minimum, includes the following ICS-based forms in its preparation:

- Cover Sheet
- ICS-202, Response Objectives
- ICS-203, Organizational Assignment List
- ICS-204, Assignment List (plus attachments, as necessary)
- ICS-205, Incident Radio Communication Plan
- ICS-206, Medical Plan
- ICS-220, Aircraft Operations
- Maps and schematic diagrams
- Transportation plan
- Site Safety Plan (Appendix B)

ICS forms can be downloaded from the Internet directly at:

http://response.restoration.noaa.gov/oilaids/ICS/intro.html

9200 Area Planning Documentation

9210 Area Committee Membership

Please refer to section 1300, Area Committee of this plan.

9220 Spills and Discharge History

9220.1 Petroleum Facilities

Oil Storage Facilities:
Fixed facilities store quantities of oil in “above” or “below” ground storage tanks. For the purposes of the Inland Sensitivity Atlas and the Western Lake Erie ACP, the term “oil” includes crude and refined petroleum products as well as vegetable oils and animal fats. The Atlas documents those aboveground facilities with a storage capacity of 42,000 gallons or more, whether the product is stored in a single tank or a series of tanks. This volume threshold also applies to facilities that transfer oil over water.

While documenting facilities that meet the 42,000-gallon threshold, the Atlas highlights two special types of fixed storage facilities. Riverine facilities involved with transfers of oil products over water have been differentiated from the other types of potential spill sources, and are referred to as over-water transfer facilities. Their proximity to major rivers, as well as the potential spill risk posed by on-loading and off-loading to vessels, merits this distinction. The other special case includes facilities known to handle high volumes of oil, generally one million gallons or more. Such facilities are required to complete Facility Response Plans (FRPs) under OPA 90. The required elements of such plans include documentation of potential harm related to accidental spills, response contingency protocols, and training documentation. Facilities required to complete FRPs are distinguished as a special class, not only because of the high volumes of oil stored on-site, but also because of the spill response planning and training they

are required to complete. These special cases are not necessarily mutually exclusive. There are 14 facilities in the Western Lake Erie area that have been deemed as having the potential to cause "significant and substantial harm" and therefore are required to prepare an FRP.

Pipelines:
Due to the volume of oil pumped through the major pipelines, the potential impact of a rupture is significant. The atlas documents major oil handling pipeline routes throughout the mapping area. A route is defined in the atlas as an individual operator's pipeline corridor through one mapping area; routes may contain more than one pipeline. The Atlas also documents the route names, the number of pipes in each route, the diameter of each pipe, and the type of product carried in the pipes. While all transmission lines are documented, the much smaller and more numerous gathering lines are not included in the Atlas.

Because several pipeline routes operated by different companies may lie in close proximity, the number of routes in a given area may not always be clear at the scales typically used for printed atlas products. For that reason, paper map atlases denote areas with stacked or closely parallel routes with a special multi-route icon. Individual routes within these dense areas are identified in the atlas tables.

9220.2 Spills and Discharge History

A brief description of large spills in the area from 1987 to 1996 follows.

Year	Name	Quantity	Product	Waterbody
1987	Apex Oil Pipeline	12,500 gallons	Gasoline	Duck Creek
1988	Sohio Refinery	4,200 gallons	Crude Oil	Driftmeyers Ditch
1989	No large spills.			
1990	BP Oil Pipeline	21,000 gallons	#2 Fuel	Duck Creek
		84,000 gallons	Decant Oil	
	Grand Trunk Railroad	1,200 gallons	#2 Diesel Fuel	Mud Creek
	BP Tank Truck	1,200 gallons	Gasoline	No water impact
1991	Sandusky Vinyl Products	1,350 gallons	#2 Fuel Oil	Storm drain and Sandusky Bay
1992	Bimini Drive Boat Fire	2,500 gallons	Gasoline, Diesel, Engine Oil	Sandusky Bay
	Sun Oil Refinery	1,000 gallons	Kerosene	Otter Creek
	Buckeye Pipeline	46,000 gallons	Gasoline	Otter Creek
1993	Seal Master, Inc.	1,500 gallons	Emulsified Asphalt	Pipe Creek
	BP Oil Company	1,890 gallons	#2 Diesel Fuel	Amlosh Ditch
1994	No large spills.			
1995	No large spills.			
1996	BP Oil Company	2,500 gallons	Crude Oil	Maumee River

For purposes of this plan, the most probable discharge is the size of the average spill in the area based on the historical data available. The maximum most probable discharge is also based on historical spill data, and is the size of 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, etc. The worst-case discharge for a vessel is a

discharge of its entire cargo in adverse weather conditions. The worst-case discharge from an offshore or onshore facility is the largest foreseeable discharge in adverse weather conditions.

This plan 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 OPA 90, to ensure consistency. The review for consistency should address, at a minimum, the economically and environmentally sensitive areas within the area, the response equipment (quantity and type) available within the area (this includes federal, state, and local government and industry owned equipment), response personnel available, equipment and personnel needs compared to those available, protection strategies, etc.

9230 Planning Assumptions: Background Information

Toledo harbor is the center of marine transportation-related activity in the Western Lake Erie basin. It is situated at the western end of Lake Erie and includes the "lower" seven miles of the Maumee River. The principal cargoes handled at the harbor are coal, iron ore, grain, petroleum products, and general cargo. Due to winter ice, the shipping season is usually limited from April through December. However, there are some winter runs of petroleum products, such as heating oil, between Detroit, Toledo, and Cleveland. Vessels also make calls at coal and iron ore facilities in Sandusky, Huron, and Marblehead, Ohio. The transport of oil and hazardous substances through the Toledo area is extensive. Much of this traffic is due to local facilities including two major petroleum refineries, several chemical distributors, chemical manufacturers, hazardous waste facilities, bulk storage facilities, and numerous other manufacturing operations. Toledo is located at the junction of rail lines and freeways connecting a number of large cities including Detroit, Chicago, Cincinnati, and Cleveland. Petroleum products are shipped regularly through the Toledo Harbor. The number of rail lines, pipelines, and highways crossing area waterways increases the likelihood of a pollution incident, which would require a federal, state, and local response.

9240 Planning Scenarios

Worst Case Discharge (Vessel): Cleveland Tanker's T/V *Gemini* (with a capacity of 68,000 bbls of heavy fuel oil or 73,000 bbls of lighter oil products) is the largest tanker in the Western Lake Erie basin on the U.S. side of the border. The most likely location for an oil spill would be in Toledo on the Maumee River during off-loading or while in transit on the river. In transit, a large spill could be the result of a bridge allision or a collision. During the off-loading procedure there is precedent for a major spill and in the case of the T/V *Gemini*'s former sister ship the T/V *Jupiter*, a major resultant fire. This incident occurred in 1990 in the Saginaw River while the *Jupiter* was off-loading and the *Buffalo* passed causing a wake that tore the *Jupiter* from her moorings and resulted in the spill and fire. This spill resulted in the loss of approximately 316,000 gallons. The lower portion of the Maumee River is commercially navigable. Primarily, the banks in this section are man-made consisting of concrete, steel, timber, and rip-rap. River dynamics in this section are heavily influenced by wind. Flows are minimal as the gradient of the river is nearly equal to that of the western basin of Lake Erie. Spills directly into the Maumee River will therefore be influenced by this lack of flow and the wind conditions. Impacts will mostly be limited to man-made receptors including the reinforced shores and a few marinas. Ecologically, some impact due to the season and known occurrences may impact state-listed threatened fish and aquatic and riparian zone vascular plants and invertebrates. The real goal will be to prevent either the migration of spilled product either upstream due to strong winds from the northeast or out of the Maumee River and into the western basin of Lake Erie. Each

scenario would set up potential large impacts to more sensitive areas including highly productive wetlands, wildlife refugees, migratory stop-overs, and breeding habitats not to mention further impacts to commerce and potential impacts to the City of Toledo's water intakes off Cedar Point.

Worst Case Discharge (non-Vessel): Buckeye Pipeline has a 12" refined product pipeline that crosses Otter Creek and can hold approximately 23,000 bbls between the existing block valves. Otter Creek basically parallels the Maumee River on the eastern side and transects the City of Oregon and near its mouth in Maumee Bay is located in a highly industrialized area. Impacts from a catastrophic loss of the contents of the pipeline would in all likelihood overwhelm the confines of Otter Creek itself. However, product that remained within the banks and flowed downstream would quickly impact any wildlife in the creek and one industrial water intake for the BP Refinery. Again, priority would be placed on quick action, minimizing the amount of spilled material that exits Otter Creek into Maumee Bay. It would seem almost inevitable that some amount of oil will be present in Maumee Bay even with a rapid concerted effort from TMAA. While the impacts themselves in Otter Creek will be minimal in comparison to other scenarios, once product has reached Maumee Bay and hence the western basin of Lake Erie those impacts have the potential to logarithmically expand with wind and wave effects. Impacts, again, will be a mix of environmental and economic, including potable water supply, wildlife, and recreation.

Maximum Most Probable Discharge (Vessel): The maximum "most probable" scenario in the coastal environment would involve a freighter transiting the area and due to an event such as an allision, a collision, or a grounding releasing the contents of its fuel tanks into the open but near shore waters of the western basin. This could be expected to release approximately 6,000 – 10,000 gallons of No. 6 Fuel Oil. With a typical specific gravity in the neighborhood of 0.876 - 1.0 transport with current, wind, and wave could quickly spread fuel. A spill in proximity to the Bass Island chain in summer would rapidly impact the islands, affecting recreation, economy, and numerous environmental habitats. Most likely, CANUSLAK would immediately be invoked as the potential for impact to Canadian waters would be high. Depending upon specific conditions, the spill could easily move southward to East Harbor State Park, Sandusky Bay or southwest to the low-lying wetland complexes of Ottawa National Wildlife Refuge, Magee Marsh Wildlife Area, Crane Creek State Park, and Metzger Marsh State Wildlife Area. This area represents one of the most productive and largest wetland complexes on the lower Great Lakes. Ecologic impacts would be to numerous riparian and aquatic communities, threatened and endangered waterfowl and predator species, breeding and nesting areas, vascular plants, fish and mussel beds. Impacts to the human environment include potable water intakes, industrial water intakes, marinas, recreational beaches, and boating. This area is highly dependent upon tourism during the summer months with such attractions and destinations as Cedar Point Amusement Park, Put-in-Bay, Port Clinton, Kelley's Island, and the above-mentioned natural areas. The highest concentration of marinas on the lower lakes is in the western basin in this vicinity. In the event of a spill of this magnitude in this area, impacts and public interest would be great.

Maximum Most Probable Discharge (non-Vessel): The maximum "most probable" scenario for a non-vessel, on-shore release would probably be a spill from an overturned tank truck on one of the area roadways – perhaps 8,000 gallons. The product would likely be a lighter end petroleum distillate product such as gasoline, kerosene, or diesel fuel. Impacts from this scenario will vary widely depending upon timing and location. These impacts could be to such environmentally sensitive areas as the waterways and refuges adjacent to Ohio State Route 2 east of Toledo; people if in densely populated area such as Monroe, the greater Toledo area,

Port Clinton, Sandusky, etc.; traffic if on one of the areas numerous arteries including I-75, US-23, Ohio Turnpike, I-475, I-280 and many other major roadways; and waterborne commerce if an incident was to occur on one of the many bridges over commercially navigable waterways.

Most Probable Discharge: The most probable discharge volume would be less than 500 gallons and more likely around 25-50 gallons. Likely sources of this type of spill would be from a pleasure craft bilge or fueling spill, a shaft seal leak or bilge discarded from a commercial vessel, or a spill from a land-based vehicle accident that entered a tributary or navigable body of water. The product would likely be a lighter end petroleum distillate product such as gasoline, kerosene, or diesel fuel.

9300 Agreements

The USCG maintains the Marine Safety Manual, Volume X that contains all the Memorandums of Understanding, Memorandums of Agreement, and Interagency Agreements. This volume is one of the supporting documents of the Western Lakes Erie ACP and is available on line at:

http://www.uscg.mil/hq/g-m/nmc/pubs/msm/vol10.htm

9400 Conversions

An online hydrologic conversion calculator that includes conversions for length, area, volume, speed, flow, temperature, and pressure can be found at:

http://www.srh.noaa.gov/wgrfc/convert.html

9500 Response References

9510 Relevant Statute/Regulations/Authorities

Please refer to Section 1000, Introduction of this plan for the relevant statutory and regulatory authorities.

9520 Fish and Wildlife Response Plans

9520.1 Regional Response Team Region 5 Fish and Wildlife Annex

The purpose of this Fish and Wildlife Annex (Appendix 9 of the RRT 5 RCP-ACP) is to provide FOSCs in Region 5 with the information needed to (a) identify and protect fish and wildlife resources and sensitive environments, (b) contact natural resources trustees and managers, and (c) provide guidance in selecting appropriate response strategies for minimizing the adverse ecological effects of a spill, including the impacts associated with response activities. Te Annex establishes procedures and policy for meeting the objectives set forth in 40 CFR Section 300.210(c)(4)(ii) of the NCP. The Annex also aids in the development of FRPs as required by 40 CFR 112.20. The Annex is to be used in conjunction with the Inland Sensitivity Atlas series and Appendix 11 of the RRT 5 RCP-ACP: Environmentally and Economically Sensitive Area Indices. The Fish and Wildlife Annex is available online at:http://www.great-lakes.net/partners/epa/acp-rcp/app_IX.html#1

9520.2 Western Lake Erie Inland Sensitivity Atlas

The Western Lake Erie Inland Sensitivity Atlas is a GIS product intended to provide contingency planners and spill responders with the most accurate and relevant information possible for spill preparedness and response. U.S. EPA Region 5, the U.S. Geological Survey (USGS), the Great Lakes Commission (GLC), and the Western Lake Erie Area Committee publish the Atlas jointly. These organizations work together to identify and collect data about sensitive environmental, economic, and cultural resources; potential spill sources; and response resources within the Western Lake Erie area. GIS products from this joint effort are being made available as printed map atlases and in digital format, including online data postings and publications on CD-ROM. A brief description of the contents is included below (for a discussion on potential spill sources as presented in the Atlas, refer to section 9220.1 above). The Western Lake Erie Inland Sensitivity Atlas can either be obtained from MSU Toledo, U.S. EPA Region 5, or online at: http://www.umesc.usgs.gov/epa_atlas/overview.html

Sensitive Species Data:
Natural Heritage Data, including state and federally-listed threatened or endangered species, were acquired under license agreements with state resource agencies. To avoid directly identifying threatened or endangered species by name Natural Heritage Data was grouped into major categories. Vascular plants, birds, amphibians and reptiles, mammals, invertebrates, fish, and natural communities were grouped into two habitat subcategories: aquatic/riparian or terrestrial/upland. Species are designated aquatic/riparian if any critical life stage takes place in that setting. This distinction is drawn to aid responders in developing site-specific response approaches. For paper map products, thirteen unique map icons symbolize the seven major species groups and two primary habitat types.

Managed Natural Resource Areas:
Many local, regional, state, and federal managed areas are high-priority sensitive natural resources that offer habitats for a wide range of plant and animal species, and may also support high levels of human use. An inventory of state and federal managed lands served as a starting point in compiling databases and preliminary maps of sensitive managed resource areas. Participants from private, local, state, and federal resource management organizations reviewed preliminary maps depicting the initial inventory of managed areas and identified additional sites known to have sensitive resources. These additional sites may include public lands managed by regional or local governments, as well as private lands known to contain sensitive resources that merit protection. Map products do not show every managed area at the county, municipal, and regional levels, but includes those identified by resource managers by virtue of their proximity to potential spill sources and intrinsic sensitivity to oil. Sensitivity was considered in the context of response operations as well as seasonal variability.

Examples of state managed areas include parks; forests; trails; wildlife management areas; scientific and natural areas; and wild, scenic, and recreational rivers. Federal lands in the atlas consist of forests; parks; recreation lands; wildlife refuges; and wild, scenic, and recreational rivers. Regional lands may consist of reserves, forests, and parks managed by cities, counties, or regional entities.

Special Designated Areas:
Natural resource areas of particular significance have been classed together as special designated areas. These areas are not necessarily owned and directly managed by public agencies, but have received a special designation status from public resource agencies and multi-organization commissions. This designation status accords formal recognition of resource sensitivity and may also carry with it a high level of legal protection. Examples include nature preserves, protected waterways, habitat restoration projects and scientific study areas.

Other Environmentally Sensitive Areas:
Other areas of natural resources significance may be documented. These additional areas generally are not publicly managed nor do they have any special designation, but they have been identified as special places meriting spill protection. These resource areas are mapped because they are valued for their natural qualities, such as habitats supporting large numbers of non-listed species. Examples include waterfowl resting areas, important fishery areas, and natural communities.

Surface Water Intakes:
Surface water intakes are sensitive because of their significance to public health and the economy. Response procedures may involve temporary shutdown of these facilities. All intakes for public water supplies and power plants have been mapped, as have intakes for industries estimated to use one million gallons or more per day. Intakes used only for intermittent purposes, such as irrigation, are not mapped. Since contamination of potable water supplies constitutes a serious threat to public health and safety, drinking water intake symbols are outlined in red in printed map editions.

Marinas:
Marinas are typically high-use recreational areas and may include picnicking, camping and fueling facilities as well as boatlifts, ramps, and slips. Due to the economic value of boats and other equipment located at marinas, these areas may be relatively high priorities for protection in the event they are threatened by a spill. Marinas may also serve as response staging areas and provide goods, services, and water access for the response effort.

Boat Access Ramps:
Access sites with concrete or gravel boat ramps may be useful for providing access to the water during a spill response. Access facilities typically lack the range and variety of services found at the majority of marinas. These sites are usually owned and managed by government agencies including state and federal land management agencies, city and village public works departments, and county governments.

Non-Navigation Dams:
As available, mapping information is provided on dams not associated with commercial navigation. These dams may be used for a variety of purposes, including public water supply, power generation, flood control, and recreation. Responders must be aware of dam locations because oil recovery becomes more difficult after passage over a dam spillway, even with dams that may be considerably smaller than commercial navigation structures.

9530 Job Aids

9530.1 Site Safety and Health Plan

Please reference **Appendix B** for the standard SSHP for the Western Lake Erie Area.

9530.2 Operational Risk Management

Please reference **Appendix C** for the Operational Risk Management document for the Western Lake Erie Area.

9540 Technical References

9540.1 NCP Product Schedule

The NCP Product Schedule is available online at:
http://www.epa.gov/oilspill/prodover.htm

9540.2 Catalogue of Crude Oil and Oil Product Properties

The Catalogue of Crude Oil and Oil Product Properties is available online at:
http://www.etcentre.org/cgi-win/oilpropspill_e.exe?Path=\Website\river\

9540.3 CHRIS Manual

The CHRIS Manual is available online at:
http://www.uscg.mil/hq/g-m/mor/articles/chris.htm

9540.4 Incident Management Handbook

The Incident Management Handbook is available online at:
http://www.uscg.mil/hq/g-m/mor/page2index.htm

9540.5 Freshwater Spills Information Clearinghouse

The Freshwater Spills Information Clearinghouse (FSIC) is a tool for planners and responders to access plans, maps, technical and scientific literature, outreach aids, and applicable laws and regulations. FSIC can be accessed online at:http://www.freshwaterspills.net/

9540.6 Specialized Monitoring Of Applied Resource Technologies
http://response.restoration.noaa.gov/oilaids.html

9540.7 Alternate Response Technologies Evaluation System
http://response.restoration.noaa.gov/oilaids.html

9600 Reserved

9700 Reserved for Area

9800 Reserved for District

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APPENDIX A

List of Acronyms

ACP ..... Area Contingency Plan
AOR ..... Area of Responsibility
ARTES ..... Alternative Response Tool Evaluation System
ARTT ..... Alternative Response Tool Team
AST ..... Atlantic Strike Team
ATSDR ..... Agency for Toxic Substance and Disease Registry
CAER ..... Community Awareness and Emergency Response Program
CWA ..... Clean Water Act
CAMEO ..... Computer Aided Management of Emergency Operations
CANUSCENT ..... Annex III to the Joint Canada-U.S. Inland Pollution Contingency Plan
CANUSLAK ..... Annex I to the Joint Canada-U.S. Marine Pollution Contingency Plan
CERCLA ..... Comprehensive Environmental Response, Compensation, and Liability Act
CHEMTREC ..... Chemical Transportation Emergency Center
CHRIS ..... Chemical Hazard Response Information System
COTP ..... Captain of the Port
CP ..... Command Post
CFR ..... Code of Federal Regulations
DEQ ..... Department of Environmental Quality (Michigan)
DNR ..... Department of Natural Resources
DOA ..... Department of Agriculture
DOC ..... Department of Commerce
DOD ..... Department of Defense
DOE ..... Department of Energy
DOI ..... Department of Interior
DOJ ..... Department of Justice
DOL ..... Department of Labor
DOS ..... Department of State
DOT ..... Department of Transportation
EEZ ..... Exclusive Economic Zone
EHS ..... Extremely Hazardous Substance
EMA ..... Emergency Management Agency
EMS ..... Emergency Medical Services
EOC ..... Emergency Operations Center
EPCRA ..... Emergency Planning and Community Right-to-Know Act
ERT ..... Environmental Response Team
ESI ..... Environmental Sensitivity Index
FEMA ..... Federal Emergency Management Agency
FINCEN ..... Finance Center
FLAT ..... Federal Lead Administrative Trustee
FOSC ..... Federal On-Scene Coordinator
FOSCR ..... Federal On-Scene Coordinator Representative
FPN ..... Federal Project Number
FRERP ..... Federal Radiological Emergency Response Plan
FWPCA ..... Federal Water Pollution Control Act
GIS ..... Geographic Information System

GLC ..... Great Lakes Commission
GSA ..... General Services Administration
HHS ..... Department of Health and Human Services
IAP ..... Incident Action Plan
IC ..... Incident Commander
ICS ..... Incident Command System
IJC ..... International Joint Commission
IO ..... Information Officer
JIC ..... Joint Information Center
JPT ..... Joint Canada-United States Preparedness Team
LEPC ..... Local Emergency Planning Committee
LO ..... Liaison Officer
MARPOL ..... 73/78 International convention of the Prevention of Pollution from Ships 1973, as
MOU ..... Memorandum of Understanding
MSU ..... Marine Safety Unit
MSP ..... Michigan State Police
NCP ..... National Oil and Hazardous Materials Contingency Plan
NHPA ..... National Historic Preservation Act
NIOSH ..... National Institute for Occupational Safety and Health
NOAA ..... National Oceanic and Atmospheric Administration
NPDES ..... National Pollution Discharge Elimination System Permits
NPFC ..... National Pollution Fund Center
NPL ..... National Priorities List
NPS ..... National Park Service
NRC ..... National Response Center
NRS ..... National Response System
NRT ..... National Response Team
NSFCC ..... National Strike Force Coordination Center
Ohio EPA ..... Ohio Environmental Protection Agency
OPA 90 ..... Oil Pollution Act of 1990
OSC ..... On-Scene Coordinator
OSHA ..... Occupational Safety and Health Administration
OSRO ..... Oil Spill Response Organization
OSTLF ..... Oil Spill Liability Trust Fund
PIAT ..... Public Information Assistance Team
PIO ..... Public Information Officer
POLREPS ..... Pollution Reports (Federal)
PREP ..... National Preparedness for Response Exercise Program
PRFA ..... Pollution Removal Fund Authorization
PSC ..... Planning Section Chief
PUCO ..... Public Utilities Commission of Ohio
RCP ..... Regional Contingency Plan
RCRA ..... Resource Conservation and Recovery Act
RP ..... Responsible Party
RPM ..... Remedial Project Manager
RQ ..... Reportable Quantity
RRT ..... Regional Response Team
SAR ..... Search and Rescue
SARA ..... Superfund Amendment and Reauthorization Act of 1986
SERC ..... State Emergency Response Commission
SHPO ..... State Historic Preservation Officer

SONS.....Spill of National Significance
SOP ..... Standard Operating Procedures
SSC..... Scientific Support Coordinator
SSHO.....Site Safety and Health Officer
SSHP ..... Site Safety and Health Plan
TES ..... Toledo Environmental Services
TMAA.....Toledo Mutual Aid Association
UCS ..... Unified Command System
USACE .....U.S. Army Corps of Engineers
USCG..... United States Coast Guard
U.S. EPA..... United States Environmental Protection Agency
USFWS..... United States Fish and Wildlife Service
VOSS.....Vessel of Opportunity Skimming System

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APPENDIX B

ICS Compatible
Site Safety and Health Plan

Table of Forms

FORM NAME	FORM#	USE	REQUIRED	OPTIONAL	ATTACHED?
Emergency Safety and Response Plan	A	Emergency response phase (uncontrolled)	X		
Site Safety Plan	B	Post-emergency phase (stabilized, cleanup)	X		
Site Map	C	Post-emergency phase map of site and hazards	X		
Emergency Response Plan	D	Part of Form B, to address emergencies	X		
Air Monitoring Log	E	To log air monitoring data	X*		
Personal Protective Equipment	F	To document PPE and procedures	X*		
Decontamination	G	To document decontamination equipment and procedures	X*		
Site Safety Enforcement Log	H	To use in enforcing safety on site		X	
Worker Acknowledgement Form	I	To document workers receiving briefings		X	
Form A Compliance Checklist	J	To assist in ensuring HAZWOPPER Compliance		X	
Form B Compliance Checklist	K	To assist in ensuring HAZWOPPER Compliance		X	
Drum Compliance Checklist	l	To assist in ensuring HAZWOPPER Compliance		X	
Other:					

EMERGENCY SAFETY and RESPONSE PLAN	1. Incident Name	2. Data/Time Prepared	3. Operational Period	4. Attachments: **Attach MSDS for each Chemical**
5. Organization IC:	Safety: Group Supv:	Entry Team:	Backup Team	Decon Team:
6. Physical Hazards and Protection	Confined Space __ Noise __ Heat Stress __ Cold Stress __ Electrical __ Animal/Plant/Insect __ Ergonomic __ Ionizing Rad __ Slips/Trips/Falls __ Struck by __ Water __ Violence __ Excavation __ Biomedical waste and/ or Needles __ Fatigue __ Other (specify)			

Major Tasks	Entry Permit	Ventilate	Hearing Protection	Shoes (type)	Hard Hats	Clothing (cold wx)	Life Jacket	Work/ Rest (hrs)	Fluids (amt/time)	Signs and Barricade	Fall Protect	Post Guards	Flash Protect	Work Gloves	Other

7. Chemical	Hazards		Target Organs	Exposure Routes	PPE	Type of PPE
	Explosive __ Flammable __ Reactive __ Biomedical __ Toxic __	Radioactive __ Carcinogen __ Oxidizer __ Corrosive __ Specify Other:	Eyes __ Nose __ Skin __ Ears __ Central Nervous System __ Respiratory __ Throat __ Lungs __ Heart __ Liver __ Kidney __ Blood __ Lungs __ Circulatory __ Gastrointestinal __ Bone __ Other:	Inhalation __ Absorption __ Ingestion __ Injection __ Membrane __	Face Shield __ Eyes __ Gloves __ Inner Suit __ Splash Suit __ Level A Suit __ SCBA __ APR __ SAR __ Cartridges __ Fire Resistance __	

8. Instruments	Action Level	Chemical Name:	LEL/UEL %	Odor Threshold PPM	Ceiling/ IDLH	STEL/TLV	Flash Point/ Ignition Point (F or C)	Vapor Pressure (mm)	Specific Gravity	Boiling Point (F or C)

EMERGENCY SAFETY and RESPONSE PLAN	1. Incident Name	2. Date/Time Prepared	3. Operational Period	4. Attachments: **Attach MSDS for each Chemical**
5. Organization IC:	Safety: Group Supv:	Entry Team:	Backup Team:	Decon Team:

6. Physical Hazards and Protection

Confined Space ☐ Noise ☐ Heat Stress ☐ Cold Stress ☐ Electrical ☐ Animal/Plant/Insect ☐ Ergonomic ☐ Ionizing Rad ☐ Slips/Trips/Falls ☐ Struck by ☐ Water ☐ Violence ☐ Excavation ☐ Biomedical waste and/or needles ☐ Fatigue ☐ Other (specify)

Major Tasks	Entry Permit	Ventilate	Hearing Protect.	Shoes (type)	Hard Hats	Clothing (cold wx)	Life Jacket	Work/ Rest (hrs)	Fluids (amount/time)	Signs and Barricade	Fall Protect	Post Guards	Flash Protect	Work Gloves	Other

7. Chemicals

Hazards		Target Organs	Exposure Routes	PPE	Type of PPE
Explosive ☐ Flammable ☐ Reactive ☐ Biomedical ☐ Toxic ☐	Radioactive ☐ Carcinogen ☐ Oxidizer ☐ Corrosive ☐ Specify Other:	Eyes ☐ Nose ☐ Skin ☐ Ears ☐ Central Nervous System ☐ Respiratory ☐ Throat ☐ Lungs ☐ Heart ☐ Liver ☐ Kidney ☐ Blood ☐ Lungs ☐ Circulatory ☐ Gastrointestinal ☐ Bone ☐ Other:	Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	Face Shield ☐ Eyes ☐ Gloves ☐ Inner Suit ☐ Splash Suit ☐ Level A Suit ☐ SCBA ☐ APR ☐ SAR ☐ Cartridges ☐ Fire Resistance ☐	

8. Instruments

O2 ☐
CGI ☐
Radiation ☐
Total HCs ☐
Colorimetric ☐
Thermal ☐
Other ☐

Action Levels	Chemical Name:	LEL/UEL %	Odor Threshold (ppm)	Ceiling/ IDLH	STEL/TLV	Flash Point/ Ignition Point (F or C)	Vapor Pressure (mm)	Vapor Density	Specific Gravity	Boiling Point F or C

Form SSP-A:

10. Site Map. Include: Work Zones, Locations of Hazards, Security Perimeter, Places of Refuge, Decontamination Line, Evacuation Routes, Assembly Point, Direction of North

11. Decontamination:				
Instrument Drop Off ☐	Suit Wash ☐	Bottle Exchange ☐	SCBA/Mask Rinse ☐	Intervening Steps ☐
Outer Boots/Glove Removal ☐	Decon Agent: Water ☐	Outer Suit Removal ☐	Inner Glove Removal ☐	Specify:
Suit/Gloves/Boot Disposal ☐	Other ☐	Inner Suit Removal ☐	Work Clothes Removal ☐	
	Specify:	SCBA/Mask Removal ☐	Body Shower ☐	

12. Potential Emergencies	Evacuation Alarms:	Emergency Prevention and Evacuation Procedures:
Fire ☐	Horn ☐ # Blasts ☐	Safe Distance:
Explosion ☐	Bells ☐ # Rings ☐	
Other ☐	Radio Code ☐	
	Other:	

13. Communications: Radio? ☐ Phone? ☐	Command #:	Tactical #:	Entry #:

14. Site Security: Personnel Assigned	Procedures:	**Equipment**
15. Emergency Medical: Personnel Assigned	Procedures:	**Equipment**

16. Prepared By:	17. Date/Time Briefed:	**Form SSP-A:** Page of

CG ICS SITE SAFETY PLAN (SSP) HAZARD ID/EVAL/CONTROL	1. Incident Name	2. Date/Time Prepared	3. Operational Period	4. Safety Officer (include method of contact
5. Supervisor/Leader	6. Location and Size of Site	7. Site Accessibility Land☐ Water☐ Air ☐ Comments:	8. For Emergencies Contact:	9. Attachments: **Attach MSDS for each Chemical**

10. Job Task/Activity	Hazards*	Potential Injury and Health Effects	Exposure Routes	Controls: Engineering, Administrative, PPE
			Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	
			Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	
			Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	
			Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	
			Inhalation ☐ Absorption ☐ Ingestion ☐ Injection ☐ Membrane ☐ ☐	

11. Prepared By:	12. Date/Time Briefed:	***HAZARD LIST**: Physical/Safety, Toxic, Explosion/Fire, Oxygen Deficiency, Ionizing Radiation, Biological, Biomedical, Electrical, Heat Stress, Cold Stress, Ergonomic, Noise, Cancer, Dermatitis, Drowning, Fatigue, Vehicle, Diving	**Form SSP-B:** **Page of**

CG ICS SSP: SITE MAP	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):
5. Supervisor/Leader:	6. Location and Size of Site:	7. Site Accessibility Land ☐ Water ☐ Air ☐ Comments:	8. For Emergencies Contact:	9. Include: Work Zones ☐ Locations of Hazards ☐ Security Perimeter ☐ Places of Refuge ☐ Decontamination Line ☐ Evacuation Routes ☐
10. Sketch of Site:				
11. Prepared By:	12. Date/Time Briefed:	**HAZARD LIST**: Physical/Safety, Toxic, Explosion/Fire, Oxygen Deficiency, Ionizing Radiation, Biological, Biomedical, Electrical, Heat Stress, Cold Stress, Ergonomic, Noise, Cancer, Dermatitis, Drowning, Fatigue, Vehicle, Diving		**Form SSP-C:** **Page of**

CG ICS SSP: EMERGENCY RESPONSE PLAN	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):
5. Supervisor/Leader:	6. Location and Size of Site:	7. For Emergencies Contact:		8. Attachments: **INCLUDE ICS FORM 206 and EMT Medical Response Procedures**
9. Emergency Alarm (sound and location):	10. Backup Alarm (sound and location):	11. Emergency Hand Signals:	12. Emergency Personal Protective Equipment Required:	

13. Emergency Notification Procedures	14. Places of Refuge (also see site map form 208B)	15. Emergency Decon and Evacuation Steps	16. Site Security Measures

17. Prepared By:	18. Date/Time Briefed:	**HAZARD LIST**: Physical/Safety, Toxic, Explosion/Fire, Oxygen Deficiency, Ionizing Radiation, Biological, Biomedical, Electrical, Heat Stress, Cold Stress, Ergonomic, Noise, Cancer, Dermatitis, Drowning, Fatigue, Vehicle, Diving	**Form SSP-D:** **Page of**

CG ICS SSP: AIR MONITORING LOG	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):	
5. Site Location:	6. Hazards of Concern:	7. Action Levels (include references):		8. Weather: Temperature: Precipitation: Wind: Relative Humidity: Cloud Cover:	
9. Instrument, ID Number Calibrated? Indicate below.	Monitoring Person Name(s):	Results (units):	Location:	Time:	Interferences and Comments:
10. Safety Officer Review:		Potential Health Effects: Bruise/Lacerations, Organ Damage, Central Nervous System Effects, Cancer, Reproductive Damage, Low Back Pain, Temporary Hearing Loss, Dermatitis, Respiratory Effects, Bone Breaks, Eye Burning			**Form SSP-E:** **Page of**

CG ICS SSP: PERSONAL PROTECTIVE EQUIPMENT	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):
5. Supervisor/Leader:	6. Location and Size of Site:	7. Hazards Addressed:	8. For Emergencies Contact:	

9. Equipment:				10. References Consulted:

11. Inspection Procedures:	12. Donning Procedures:	13. Doffing Procedures:	14. Limitations and Precautions (include maximum stay time in PPE):

15. Prepared By:	16. Date/Time Briefed:	Potential Health Effects: Bruise/Lacerations, Organ Damage, Central Nervous System Effects, Cancer, Reproductive Damage, Low Back Pain, Temporary Hearing Loss, Dermatitis, Respiratory Effects, Bone Breaks, Eye Burning	**Form SSP-F:** **Page of**

CG ICS SSP: DECONTAMINATION	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):
5. Supervisor/Leader:	6. Location and Size of Site:	7. For Emergencies Contact:	8. Hazard(s) Addressed:	

9. Equipment:				10. References Consulted:

11. Contamination Avoidance Practices:	12. Decon Diagram:	13. Decon Steps:

14. Prepared By:	15. Date/Time Briefed:	Potential Health Effects: Bruise/Lacerations, Organ Damage, Central Nervous System Effects, Cancer, Reproductive Damage, Low Back Pain, Temporary Hearing Loss, Dermatitis, Respiratory Effects, Bone Breaks, Eye Burning	**Form SSP-G:** **Page of**

CG ICS SSP: ENFORCEMENT LOG	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Safety Officer (include method of contact):	
5. Supervisor/Leader	6. For Emergencies Contact:			7. Attachments:	
8. Job Task/Activity:	Hazards:	Deficiency:	Action Taken:	Safety Plan Amended?	Signature of Supervisor/Leader:
9. Prepared By:	10. Date/Time Briefed:	**HAZARD LIST**: Physical/Safety, Toxic, Explosion/Fire, Oxygen Deficiency, Ionizing Radiation, Biological, Biomedical, Electrical, Heat Stress, Cold Stress, Ergonomic, Noise, Cancer, Dermatitis, Drowning, Fatigue, Vehicle, Diving			**Form SSP-H:** **Page of**

CG ICS SSP WORKER ACKNOWLEDGEMENT FORM	1. Incident Name:	2. Site Location:	3. Attachments:	
4. Type of Briefing Safety Plan/Emergency Response Plan ☐ Start Shift ☐ Pre-Entry ☐ Exit ☐ End of Shift ☐ Specify Other:	**5. Presented By:**		**6. Date**	**7. Time**
8. Worker Name (Print)	**Signature***		**Date**	**Time**

*** By signing this document, I am stating that I have read and fully understand the plan and/or information provided to me.**

SSP-I: Worker Acknowledgement

CG ICS Emergency Response Plan 1910.120 COMPLIANCE CHECKLIST	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Site Supervisor/Leader:	5. Location of Site:

Cite: 1910.120	Requirement (sections that duplicate or explain are omitted)	ICS Form	[4]	Comments
(**q**)(1)	Is the plan in writing?	SSP-A	☐	
(1)	Is the plan available for inspection by employees?	N/A	☐	Performance based
(**q**)(2)(i)	Does the plan address pre-emergency planning and coordination?	SSP-A	☐	
(ii)	Does it address personnel roles?	SSP-A	☐	
(ii)	Does it address lines of authority?	SSP-A	☐	
(ii)	Does it address communications?	SSP-A	☐	
(iii)	Does it address emergency recognition?	SSP-A	☐	
(iii)	Does it address emergency prevention?	SSP-A	☐	
(iv)	Does it identify safe distances?	SSP-A	☐	
(iv)	Does it address places of refuge?	SSP-A	☐	
(v)	Does it address site security and control?	SSP-A	☐	
(vi)	Does it identify evacuation routes?	SSP-A	☐	
(vi)	Does it identify evacuation procedures?	SSP-A	☐	
(vii)	Does it address decontamination?	SSP-A	☐	
(viii)	Does it address medical treatment and first aid?	SSP-A	☐	
(ix)	Does it address emergency alerting procedures?	SSP-A	☐	
(ix)	Does it address emergency response procedures	SSP-A	☐	
(x)	Was the response critiqued?	N/A	☐	Performance based
(xi)	Does it identify Personal Protection Equipment?	SSP-A	☐	
(xi)	Does it identify emergency equipment?	SSP-A	☐	
(**q**)(3)(ii)	All the hazardous substances identified to the extent possible?	N/A	☐	Performance based
(ii)	All the hazardous conditions identified to the extent possible?	N/A	☐	Performance based
(ii)	Was site analysis addressed?	N/A	☐	Performance based
(ii)	Were engineering controls addressed?	N/A	☐	Performance based
(ii)	Were exposure limits addressed?	N/A	☐	Performance based
(ii)	Were hazardous substances handling procedures addressed?	N/A	☐	Performance based
(iii)	Is the PPE appropriate for the hazards identified?	N/A	☐	Performance based
(iv)	Is respiratory protection worn when inhalation hazards present?	N/A	☐	Performance based
(v)	Is the buddy system used in the hazard zone?	N/A	☐	Performance based
(vi)	Are backup personnel on standby?	N/A	☐	Performance based
(vi)	Are advanced first aid support personnel standing by?	N/A	☐	Performance based
(vii)	Has the ICS designated safety official been identified?	SSP-A	☐	
(vii)	Has the Safety Official evaluated the hazards?	N/A	☐	Performance based
(viii)	Can the Safety Official communicate with IC immediately?	N/A	☐	Performance based
(ix)	Are appropriate decontamination procedures implemented?	N/A	☐	Performance based

CG ICS SSP: 1910.120 COMPLIANCE CHECKLIST	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:	4. Site Supervisor/Leader:	5. Location of Site:

Cite: 1910.120	Requirement (sections that duplicate or explain are omitted)	ICS Form	[4]	Comments
(**b**)(1)(ii)(A)	Organizational structure?	203	☐	
(B)	Comprehensive work plan?	IAP	☐	Incident Action Plan
(C)	Site Safety Plan?	SSP-B	☐	
(D)	Safety and health training program?	N/A	☐	Responsibility of each employer
(E)	Medical surveillance program?	N/A	☐	Responsibility of each employer
(F)	Employer SOPs?	N/A	☐	Responsibility of each employer
(G)	Written program related to site activities?	N/A	☐	
(**b**)(1)(iii)	Site excavation meets shored or slope requirements in 1926?	N/A	☐	
(**b**)(2)(i)(D)	Lines of communication?	201 203 205	☐	
(**b**)3(iv)	Training addressed?	N/A	☐	Responsibility of each employer
(v)-(vi)	Information and medical monitoring addressed?	N/A	☐	Responsibility of each employer
(**b**)4(i)	Site Safety Plan kept on site?	N/A	☐	
(ii)(A)	Safety and health hazard analysis conducted?	N/A	☐	
(B)	Properly trained employees assigned to right jobs?	N/A	☐	
(C)	Personnel Protective Equipment issues addressed?	SSP-F	☐	
(E)	Frequency and types of air monitoring addressed?	SSP-E	☐	
(F)	Site control measures in place?	SSP-B	☐	
(G)	Decontamination procedures in place?	SSP-G	☐	
(H)	Emergency Response Plan in place?	SSP-D	☐	
(I)	Confined space entry procedures?	SSP-B	☐	
(J)	Spill containment program	SSP-B	☐	
(iii)	Pre-entry briefings conducted?	SSP-I	☐	
(iv)	Site Safety Plan effectiveness evaluated?	SSP-H	☐	
(**c**)(1)	Site characterization done?	N/A	☐	
(**c**)(2)	Preliminary evaluation done by qualified person?	N/A	☐	
(**c**)(3)	Hazard identification performed?	SSP-B	☐	
(**c**)(4)(i)	Location and size of site identified?	SSP-B	☐	
(ii)	Response activities, job tasks identified?	SSP-B	☐	
(iii)	Duration of tasks identified?	SSP-B	☐	Operational period
(iv)	Site topography and accessibility addressed?	SSP-C	☐	
(v)	Health and safety hazards addressed?	SSP-B	☐	
(vi)	Dispersion pathways addressed?	SSP-B	☐	
(vii)	Status and capabilities of medical emergency response teams?	206	☐	
(**c**)(5)(i)(iv)	Chemical protective clothing addressed and properly selected?	SSP-F	☐	
(ii)	Respiratory protection addressed?	SSP-B and F	☐	
(iii)	Level B used for unknowns?	N/A	☐	
(**c**)(6)(i)	Monitoring for ionization conducted?	SSP-E	☐	
(ii)	Monitoring conducted for IDLH conditions?	SSP-E	☐	
(iii)	Personnel looking out for dangers of IDLH environments?	N/A	☐	
(iv)	Ongoing air monitoring program in place?	SSP-E	☐	

CG ICS SSP: 1910.120 COMPLIANCE CHECKLIST	1. Incident Name:	2. Date/Time Prepared:	3. Operational Period:		
Cite: 1910.120	Requirement		ICS Form	[4]	Comments
(**c**)(7)	Employees informed of potential hazard occurrence?		SSP-B	☐	
(**c**)(8)	Properties of each chemical made aware to employees?		SSP-B	☐	
(**d**)(1)	Appropriate site control procedures in place?		IAP, SSP-B	☐	
(**d**)(2)	Site control program developed during planning stages?		IAP, SSP-B	☐	
(**d**)(3)	Site map, work zones, alarms, communications addressed?		IAP, SSP-B	☐	
(**g**)(1)(i)	Engineering, admin controls considered?		SSP-B	☐	
(iii)	Personnel not rotated to reduce exposures?		N/A	☐	
(**g**)(5)(i)	PPE selection criteria part of employer's program?		N/A	☐	Responsibility of employer
(ii)	PPE use and limitations identified?		SSP-F	☐	
(iii)	Work mission duration identified?		SSP-F	☐	
(iv)	PPE properly maintained and stored?		N/A	☐	Responsibility of employer
(vi)	Are employees properly trained and fitted with PPE?		N/A	☐	Responsibility of employer
(vii)	Are donning and doffing procedures identified?		SSP-F	☐	
(viii)	Are inspection procedures properly identified?		SSP-F	☐	
(ix)	Is a PPE evaluation program in place?		SSP-F	☐	
(**h**) (3)	Periodic monitoring conducted?		SSP-E	☐	
(**k**)(2)(i)	Have decontamination procedures been established?		SSP-G	☐	
(ii)	Are procedures in place for contamination avoidance?		SSP-G	☐	
(iii)	Is personal clothing properly deconned prior to leaving the site?		SSP-G	☐	
(iv)	Are decontamination deficiencies identified and corrected?		SSP-H	☐	
(**k**)(3)	Are decontamination lines in the proper location?		SSP-C	☐	
(**k**)(4)	Are solutions/equipment used in decon properly disposed of?		N/A	☐	
(**k**)(6)	Is protective clothing and equipment properly secured?		N/A	☐	
(**k**)(7)	If cleaning facilities are used, are they aware of the hazards?		N/A	☐	
(**k**)(8)	Have showers and change rooms provided, if necessary?		N/A	☐	
(**l**)(1)(iii)	Are provisions for reporting emergencies identified?		SSP-D	☐	
(iv)	Are safe distances and places of refuge identified?		SSP-B and C	☐	
(v)	Site security and control addressed in emergencies?		SSP-D	☐	
(vi)	Evacuation routes and procedures identified?		SSP-D	☐	
(vii)	Emergency decontamination procedures developed?		SSP-D	☐	
(ix)	Emergency alerting and response procedures identified?		SSP-D	☐	
(x)	Response teams critiqued and follow-up performed?		SSP-H	☐	
(xi)	Emergency PPE and equipment available?		SSP-D	☐	

CG ICS SSP: 1910.120 COMPLIANCE CHECKLIST	1. Incident Name	2. Date/Time Prepared	3. Operational Period		
Cite: 1910.165	Requirement		ICS Form	[4]	Comments
(**l**)(3)(i)	Emergency notification procedures identified?		SSP-D	☐	
(ii)	Emergency response plan separate from Site Safety Plan?		SSP-D	☐	
(iii)	Emergency response plan compatible with other plans?		SSP-D	☐	
(iv)	Emergency response plan rehearsed regularly?		SSP-D	☐	
(v)	Emergency response plan maintained and kept current?		SSP-H	☐	
1910.165(**b**)(2)	Can alarms be seen/heard above ambient light and noise levels?		N/A	☐	
(**b**)(3)	Are alarms distinct and recognizable?		N/A	☐	
(**b**)(4)	Are employees aware of the alarms and are they accessible?		SSP-D	☐	
(**b**)(5)	Are emergency phone numbers, radio frequencies clearly posted?		206	☐	
(**b**)(6)	Signaling devices in place where there are 10 or more workers?		IAP	☐	
(**c**)(1)	Are alarms like steam whistles, air horns being used?		IAP	☐	
(**d**)(3)	Are backup alarms available?		IAP	☐	
1910.120(m)	Are areas adequately illuminated?		IAP	☐	
(**n**)(1)(i)	Is an adequate supply of potable water available?		IAP	☐	
(ii)	Are drinking water containers equipped with a tap?		IAP	☐	
(iii)	Are drinking water containers clearly marked?		IAP	☐	
(iv)	Is a drinking cup receptacle available and clearly marked?		IAP	☐	
(**n**)(2)(i)	Are non-potable water containers clearly marked?		IAP	☐	
(**n**)(3)(i)	Are their sufficient toilets available?		IAP	☐	
(**n**)(4)	Have food-handling issues been addressed?		IAP	☐	
(**n**)(6)	Have adequate wash facilities been provided outside hazard zone?		IAP	☐	
(**n**)(7)	If response is greater than 6 months, have showers been provided?		IAP	☐	
4. Prepared By:					**Form SSP-K: Page 3**

CG ICS SSP: 1910.120 DRUM COMPLIANCE CHECKSHEET	1. Incident Name	2. Date/Time Prepared	3. Operational Period	4. Safety Officer (include method of contact)
5. Supervisor/Leader	6. Location and Size of Site	7. For Emergencies Contact:		8. Note: tanks and vaults should also be treated in the same manner as described below [1910.120(j)(9)]. Many can also pose confined space hazards.

9. Cite: 1910.120 (Cites that duplicate or explain requirements are omitted)	Requirement	[4]	Comments
(**j**)(1)(ii)	Drums meet DOT, OSHA, EPA regs for waste they contain, including shipment?	☐	
(iii)	Drums inspected and integrity ensured prior to movement?	☐	
(iii)	Or drums moved to an accessible location (staging area) prior to movement?	☐	
(iv)	Unlabelled drums treated as unknown until properly identified and labeled?	☐	
(v)	Site activities organized to minimize drum handling?	☐	
(vi)	Employers properly warned about the hazards of moving and handling drums?	☐	
(vii)	Suitable overpack drums are available for addressing leaking and ruptured drums?	☐	
(viii)	Leaking materials from drums properly contained?	☐	
(ix)	Are drums that cannot be moved, emptied of contents with transfer equipment?	☐	
(x)	Are suspect buried drums surveyed with underground detection system?	☐	
(xi)	Are soil and covering material above buried drums removed with caution?	☐	
(xii)	Is the proper extinguishing equipment on scene to control incipient fires?	☐	
(**j**)(2)(i)	Are airlines on supplied air systems protected from leaking drums?	☐	
(ii)	Are employees at a safe distance, using remote equipment, when handling explosive drums?	☐	
(iii)	Are explosive shields in plane to protect workers opening explosive drums?	☐	
(iv)	Is response equipment positioned behind shields when shields are used?	☐	
(v)	Are non-sparking tools used in flammable or potentially flammable atmospheres?	☐	
(vi)	Are drums under extreme pressure opened slowly & workers protected by shields/distance?	☐	
(vii)	Are workers prohibited from standing and working on drums?	☐	
(**j**)(3)	Is the drum handling equipment positioned and operated to minimize sources of ignition?	☐	
(**j**)(5)(i)	For shock sensitive drums, have all non-essential employees been evacuated?	☐	
(ii)	For shock sensitive drums: is handling equipment provided with shields to protect workers?	☐	
(iii)	Are alarms that announce start/finish of explosive drum handling actions in place?	☐	
(iv)	Are continuous communications in place between the drum-handling site & command post?	☐	
(v)	Are drums under pressure properly controlled before handling?	☐	
(vi)	Are drums containing packaged laboratory wastes treated as shock sensitive?	☐	
(**j**)(6)(i)	Are lab packs opened by trained and experienced personnel?	☐	
(ii)	Are lab packs showing crystallization treated as shock sensitive?	☐	
(**j**)(8)(ii-iii)	Are drum staging areas manageable with marked access and egress?	☐	
(iv)	Is bulking of drums conducted only after drum contents have been properly identified?	☐	

10. Prepared By:	**Form SSP-L:**

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APPENDIX C

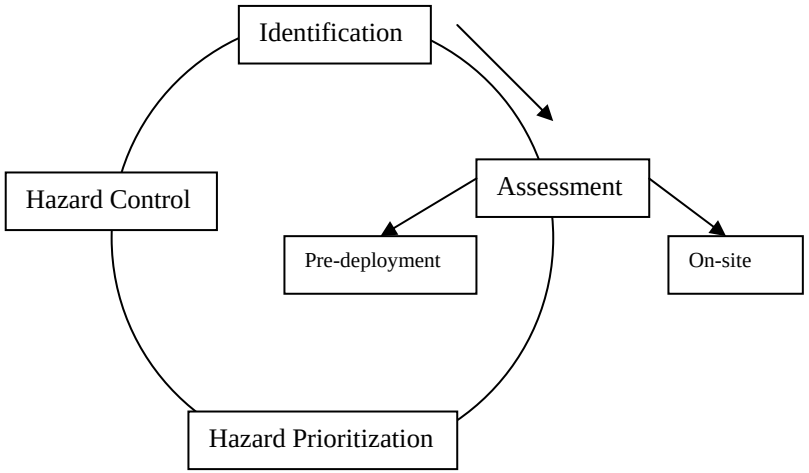
OPERATIONAL RISK MANAGEMENT & SAFETY GUIDE

Ref: (a) Operational Risk Management COMDTINST 3500.3

Operational Risk Management Process

1. Identify Mission Tasks
2. Identify Hazards
3. Assess Risks
4. Identify Options
5. Evaluate Risk vs. Gain
6. Execute Decision
7. Monitor Situation

THE HAZARD CYCLE (For ORM Steps 2 and 3)



1. IDENTIFY MISSION TASKS

(Self explanatory)

2. HAZARD IDENTIFICATION

Types of Hazards:

Physical	Chemical/Biological	Human
Slipping	Explosion	Violence
Tripping	Flammable	Poor Lifting
Fall	Air Reactive	Repetition
Overhead	Water Reactive	Excessive Force
Heat Stress	Chemically Reactive	Poor posture
Cold Stress	Alpha Radiation	Awkward motion
Electrical	Beta Radiation	Fatigue
Blunt Objects	Gamma Radiation	Poor hygiene
Sharp Objects	X-Ray	Illness
Noise	Bio-weapon	Alcohol/Drugs
Vehicle	Chemical weapon	Over crowding
Fire	Irritant	Poor comms
Sun/UV Glare	Asphyxiant	Noise interference
Sun Burn	Oxidizer	Smoking
Moving Pinch Points	Carcinogen	Driving
Unguarded Machinery	Corrosive	**Animal/Plant**
Lightning	Cryogenic	Bites/Stings
Drowning	Toxic	Poison
Engulfment	Biomedical	Thorns/burrs
	Particulates	Swarms
	Fumes (weld etc.)	Disease
	O2 Deficiency	Feces/Coliforms

3. RISK ASSESSMENT

Risk = Severity x Probability

Conduct risk analysis before departing workplace (pre-deployment) and once you arrive on-site.

a. Severity (of Hazard)

Potential consequence of an event measured in terms of degree of damage, injury or impact on a mission.

Range	Relative Rank	Health Examples
None or slight	1	None to minimal annoyances (mosquitoes)
Minimal	2	Temporary damage with irritant qualities only
Significant	3	Temporary damage, impairing mental/physical ability
Major	4	Temporary long-term damage needing hospitalization
Catastrophic	5	Permanent damage, loss of limb or life

b. Probability

The likelihood that the potential consequences will occur.

A number of factors influence the probability of a hazard consequence. They can be divided into the following categories:

Environment Time Source Human Interaction Work

They can increase or decrease the probability of the hazard

When considering these factors, it is important to determine how these factors change the hazard in relation to hazard recipients (public, workers, responders, environment, property, etc.). Do they make the hazard more likely to effect a recipient or less likely?

Environment

Factor	Intensity of Factor	Result
Wind	Increase	Increase dispersion Increase cold stress Increase plume/vapor directional flow Increase evaporation Increase slips/trips/falls
Rain	Increase	Increase in chemical plume washout Increase runoff Increase gravitational flow Increase slips/trips/falls Decrease visibility
Water Currents	Increase	Increase in dispersion Increase directional flow Decrease boat handling ability Increase drowning danger
Sea State	Increase	Increase dispersion Increase evaporation Decrease directional flow Decrease boat handling Increase drowning danger
Sunlight	Increase	Increase photo-oxidation (chemical change) Increase UV eye-glare hazard Increase sunburn hazard
Temperature	Increase	Increase heat stress Decrease viscosity (thickness) Increase evaporation Increase photo-oxidation (change) Increase chemical reaction
	Decrease	Increase cold stress (Opposite of heat increase)
Fog	Increase	Decrease visibility Increase surface slipperiness

Time

Increase	Duration of exposure increased Evaporation progressed Diminished chemical volatility Diminished chemical reactivity

Source

Factors to Consider:

• Amount spilled	• Viscosity
• Visibility, how noticeable	• Air Density
• Toxicity	• Specific Gravity
• Evaporation Rate/ Volatility	• Solubility
• Persistence	• Water mixing
• Vapor pressure	• Reactivity
• Flammability/Explosive	• Oxidizer
• Odor threshold	• Carcinogenicity

Human

Factors to Consider:

• Age	• Medications
• Fitness level	• Temperature acclimatization
• Weight	• Stress
• Current Health	• Fatigue
• Training	• Communications

Work

Factors to Consider:

• Proximity to hazard	• Degree of hazard movement
• Degree of hazard handling	• Heavy Loads
• Increased breathing due to work	• Mental Stress
• Awkward movements required	• Forceful exertion required
• Repetitive motion	• Increased body heat generation

(1) Probability Rating

The likelihood that the potential consequences will occur.

Range	Relative Rank
Impossible/Remote	1
Unlikely under normal conditions	2
About 50-50 chance	3
Greater than 50% Chance	4
Very likely to happen	5

Example

Activity	Relative Rank
Fire/explosion from closed gas container	1
Fire/explosion when pouring gas	2
Smoker nearby while pouring gas	3
Welding close but not in contact with gas	4
Bring flame in contact with gas	5

c. Prioritize Hazards

(1) Multiply severity and probability relative ranks.

(2) Rank hazards in descending order starting from lowest (1) to highest (25).

4. **IDENTIFY CONTROL OPTIONS**

(a) Engineering
(b) Administrative
(c) Personal Protective Equipment

Types of Engineering Controls:

Barriers	Shields	Dams
Capping	Covering	Fencing
Terminating	Shutting	Blocking
Chocks	Enclosures	Diverters
Flanging	Guarding	Substitution
Anchoring	Ventilation	Blowing
Scaffolding	Grounding	Substitution
Bonding	Insulation	Lighting
Locks, Tags	Kill-switches	Shut-off valves
Taglines	Circuit Breakers	Process change
Plugging, patching	Sealing	Absorbers

Types of Administrative Controls:

Reduced work duration	Worker rotation	Safety plans
Training	Safety briefs	Relief personnel
Maintenance	Drinking fluids	Work/rest periods
Good housekeeping	Roving security	Signs
Warning lights	Alarms	Break areas
Pre-inspections	Field checks	Buddy system
Line of sight comms	Comms schedule	Equipment staging
Load shifting	Hazard marking	Placarding
Labeling	Hand signals	Safety observers
Fendering	Work plans	Replenish fluids
Handcarts/trolleys	Fire extinguishers	Drum bulking
Eye Wash Station	Hand washers	Showers

Types of Personal Protective Equipment Controls:

Hard hats	Steel-toed shoes	Safety glasses
Safety goggles	Face shields	Hearing Protection
Life jacket	Fall arrests	SCBA
APRs	Chemical suits	Flash suits
Fire resistant suits	Work gloves	Chemical gloves
Sun glasses	Sun-block	Life rings
Eye wash stations	Night vision	Thermal protection
Dry/wet suits	Hand warmers	Wind breaker coat
Knee pads	Over garments	Coveralls
Booties	Cooling vests	Chap lip protection
Hats for warming	Gloves (warmth)	Clothing (warmth)

5. **EVALUATE RISK VS. GAIN**

Risks (**H**igh, **M**ed, **L**ow)		Gains (Check appropriate)			
Response Personnel			Save	Protect	Mitigate
Other Agency Persons		Human Health			
Private Response Persons		Environment			
Organizational Property		Property			
Other Agency Property		U.S. Security			
Private Response Property		Economic			

6. **EXECUTE THE DECISION**

7. **MONITOR THE SITUATION**

a. Human Health

(1) Conduct medical monitoring (heart rate, blood pressure, body temperature, etc).

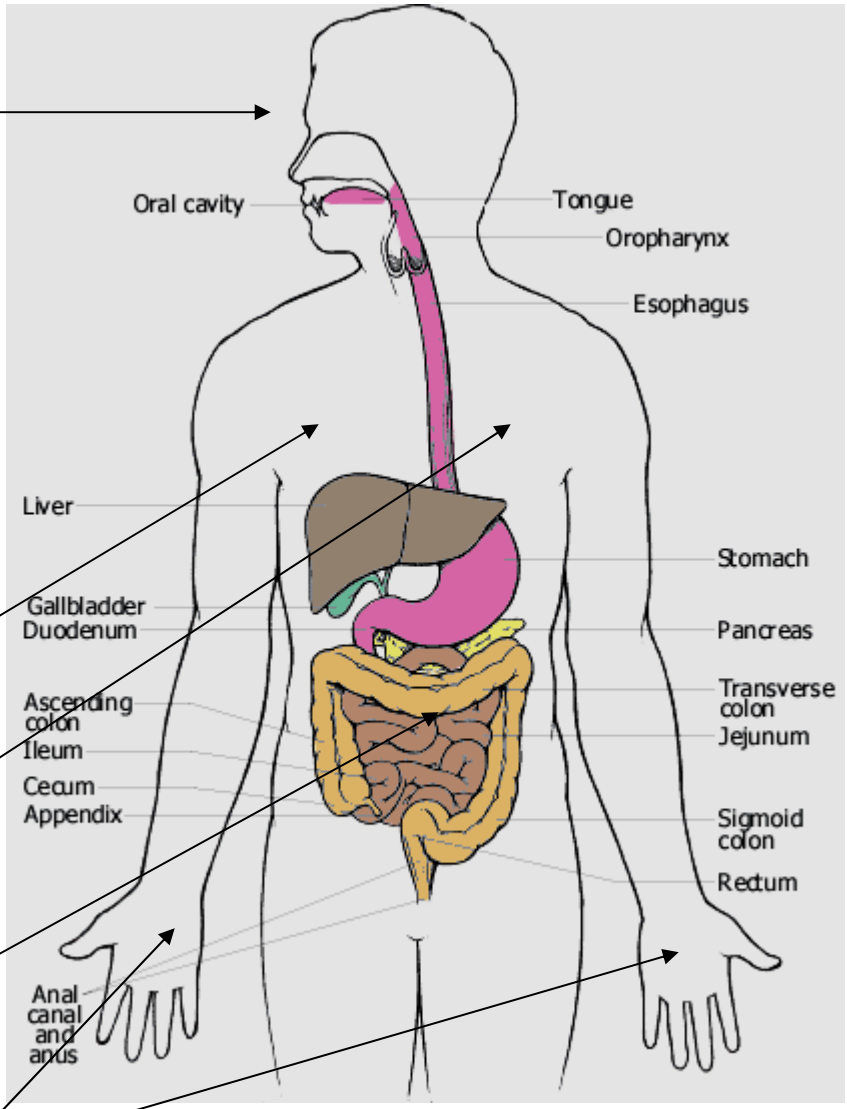
(2) Monitor personal symptoms.

HEADACHE
LIGHTHEADEDNESS
DIZZINESS
DROWSINESS
EXHILARATION
GIDDINESS
REDDENING OF FACE
NERVOUSNESS
RESTLESSNESS
CONFUSION
DISTURBED VISION
ABNORMAL SALIVATION
DIFFICULTY HEARING

DRYNESS/IRRITATION
COUGHING, SNEEZING
DIFFICULTY BREATHING
IRREGULAR HEARBEAT

ABDOMINAL PAIN
NAUSEA
VOMITING
BACK PAIN

RED, RASH, BLISTERED, OR BURNED SKIN



<u>ADDITIONAL SYMPTOMS</u>:
PAINFUL MOVEMENT
NUMBNESS
DIARRHEA
WEAKNESS
SWEATING
SWELLING/SORENESS
BLEEDING

NOTE: *You may suffer from one or many symptoms.*

GRAPHIC: http://www.ama-assn.org/insight/gen_hlth/atlas/newatlas/digest.htm

(3) Fatigue Symptoms

Forgetfulness	Indecisiveness
Slowed Reaction	Reduced Vigilance
Poor Comms	Fixation
Apathy	Lethargy
Moody	Nodding Off

(4) Heat Stress Symptoms

Type	Symptom
Heat Stroke	Skin is hot Skin is dry Skin is red & spotted Body Temp > 105 Mental confusion Convulsions Unconscious
Heat Exhaustion	Extreme Weakness Giddiness Headache Nausea Vomiting Skin clammy, moist Face pale/flushed Body Temp normal Body Temp elevated
Heat Cramps	Painful muscle spasms Profuse sweating
Fainting	Lack of blood to brain
Heat Rash	Skin rash Prickly heat feeling

(5) Cold Stress Symptoms

Type	Symptom
Hypothermia	Mental alertness reduced Fatigue Slow physical reaction Apathy Pain in extremities Maximum shivering Dilated pupils Clouded consciousness Poor decision making
Frostbite	Whitened areas of skin Burning sensation at first Blistering Affected area cold, numb tingling

j. Action Levels

Type	Measurement
Oxygen	%
Combustibility	%
Toxic Limits (ex. TLV)	Varied units
Radiation	Varied units

g. Changes in the Hazard Source

Form	Fuming	Vapors
Bulging	Noise	Leakage
Color	Texture	Reaction
Compression	Temperature	Size

h. Changes in Work Activity

Source interaction	Source stirring	Diverting, damming, diking
Blanketing	Intensity	Duration
Day/Night	# Breaks	New personnel
New management	Change in location	Change in facilities
Material handling		

i. Changes in the Environment

Temperature	Sunlight	Cloud cover
Water color	Surfaces	Vegetation
Animal behavior	Animal appearance	Corrosion
Currents	Water levels	Precipitation
Wind	Sea State	Visibility

j. Equipment

Gauges	Background check	Reproducibility
Accuracy	Noise output	Drift readings
Shock sensitivity	Exhaust output	Pump activity
Battery life	Intrinsic Safety	Radio interference
Water damage	Decontamination	Vibration
Last service date	Calibration log	Physical appearance
Gaskets	Filters	Fluid/Air pressure levels
Safety features	Electrical wires	Grounding, bonding
Hose kinks/bends	Attachments	Fittings
Leaks/hissing	Performance Parameters	Comms check conducted

o. Personal Protective Equipment

(a) Head, Eye, Ear, Hand and Other Types of Protection

Hard hat not cracked, damaged, worn, fits properly & meets safety standards
Eye protection suitable for hazard type and meets standards
Ear protection in good condition & meets noise hazard level
Sunglasses with proper UV protection used when appropriate
Sun screen used in heavy UV environment
Proper type of glove used to address hazard
Gloves fit tightly and with no chance of being caught in pinch points
Proper life jackets used and securely attached to wearer
Proper footwear (steel toed shoes) and foot-to-surface friction attained.
Fall protection used where necessary

(b) Air Purifying Respirators & Self Contained Breathing Apparatus

Mask, seals, valves and straps not deteriorated cracked or worn
Proper APR cartridge for mask (by hazard and by manufacturer)
Mask lens clear and free of obstructions
Sun glare cap for lens available if needed
Mask lens applied with defogging agent or use nose cup
Mask passes field negative pressure tests
Optical kits available for personnel who need them
SCBA bottle full of proper grade of air
SCBA bottle service life not expired
SCBA bottle hydrostatically tested within prescribed dates
Main line, bypass valve and regulator operative
Alarms working
Regulator not filled with condensation in cold weather
“O” rings in place in hoses and masks
Breathing tube not deteriorated, passes field “stretch” test
SCBA Mask passes negative pressure, one handed field test

(c) Protective Suits

Seams free of defects and holes
Free of deterioration, tears, and holes
Free of pin holes (hold up to sun or flashlight)
Free if discoloration, swelling and stiffness
Free not brittle due to extreme cold weather
Zippers and latches waxed in cold weather
Suit not significantly creased
Suit log indicates maintenance tests within prescribed periods (i.e. 6 months)

k. Contamination Avoidance and Decontamination

Proper decontamination method chosen
Zones of control (Hot, Warm, Cold) clearly marked and secured
Entry personnel aware of heavy contaminated areas to avoid within Hot Zone
Minimum amount of decon personnel used to decon entry team
Proper decon steps used
Personnel properly showered and cleaned prior to departing site
Disposable work clothes used beneath protective clothing
Protective clothing properly decontaminated and disposed of
Work clothing laundered in separate facility not at worker homes

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EMERGENCY NOTIFICATIONS

Western Lake Erie
Area Contingency Plan

June 2002

Report all spills impacting or having the potential to impact the land, air, and waters of the U.S. to the **National Response Center** at:

800-424-8802 (24-hour)
Calls placed from the U.S. or Canada

Always Notify:
- Chain of command: getting first responders underway, as appropriate
- State lead agency (Ohio EPA or Michigan DEQ)
- Fire department and other local response agencies
- USCG MSU Toledo CDO 419-418-0324 (24-hr)
- U.S. EPA Region 5 ..... 312-353-2318 (24-hr)

For incidents impacting Canadian waters notify:
- Ontario Ministry of the Environment Spills Action Centre 416-325-3000 (24-hr)
- Canadian Coast Guard Regional Operations Centre 519-336-6221 (24-hr)

For incidents in Ohio notify:

All verbal notifications are to be reported to the Ohio EPA's Emergency Response Section, LEPC(s) that may be impacted, and the jurisdictional fire department(s).

- Ohio EPA 800-282-9378 (24-hr)
  614-224-0946 (24-hr, out-of-State)
- Erie County 419-625-7951 (24-hr)
- Lucas County 419-243-5111 (24-hr)
- Ottawa County 419-734-4404 (24-hr)
- Sandusky County 419-332-2613 (24-hr)
- Wood County 419-354-9001 (24-hr)

For incidents in Michigan notify:

At a minimum in Michigan, immediate notifications should be made to the State through PEAS, the LEPC(s) that may be impacted, and the jurisdictional response organization(s). Additional report spill-specific requirements are available online at:
http://www.deq.state.mi.us/documents/deq-ead-sara-releasetable.pdf

- Michigan Pollution Emergency Alert System (PEAS) 800-292-4706 (24-hr)
  517-373-7660 (24-hr, out-of-State)
- Monroe County 734-243-7070 (24-hr)

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Chaffey Amendment Summary

Chaffey Amendment

- *Section 1144 of the Coast Guard Authorization Act of 1996, otherwise known as the "Chaffee Amendment," amended the FWPCA regarding the use of spill response plans.*
- *Section 1144 states that the "owner or operator may deviate from the applicable response plan if the President or the Federal On-scene Coordinator determines that deviation from the response plan would provide for a more expeditious or effective response to the spill or mitigation of its environmental effects."*
- *The Coast Guard interprets this amendment as applicable to the use of contracted resources, qualified individuals, and other "significant" deviations from the plan.*
- *The Coast Guard intends to give precedence to the Incident Action Plan as developed by a Unified Command during an actual response.*

Regulatory Information

Coast Guard Act of 1996: Chaffee Amendment. Section 311(c)(3)(B) of the Federal Water Pollution Control Act (33 USC 1321(c)(3)(B)) is amended by striking "or as directed by the President" and inserting "except that the owner or operator may deviate from the applicable response plan if the President or the Federal On-Scene Coordinator determines that deviation from the response plan would provide for a more expeditious or effective response to the spill or mitigation of its environmental effects."

The following is a complied list of local scientists, both inside and outside the Federal Government service, with expertise in the environmental effects of spills of the types of oil typically transported in the area, who may be contacted to provide information or, where appropriate, participate in meetings of the scientific support team convened in response to a spill, and describe the procedures to be followed for obtaining an expedited decision regarding the use of dispersants.

To obtain scientific information during an event the first contact should be the District NOAA Scientific Support Coordinator. The SSC will insure that the necessary scientists are contacted.

The NOAA SSC can be reached 24 hours a day by calling (206) 526-4911.

Stephen M. Lehmann NOAA SSC 408 Atlantic Avenue Boston, MA 02110-3350 (617) 223-8016	**Gary Ott** NOAA SSC USCG TRACEN Yorktown Yorktown, VA 23690-5000 (757) 856-2755
Bradford L. Benggio NOAA SSC 909 SE 1st Avenue, Room 714 Miami, FL 33131 (305) 530-7931 [cell: (206) 849-9923]	**Charlie B. Henry** NOAA SSC - USCG 8th District M 500 Poydras Street New Orleans, LA 70810 (504) 589-4414
Ruth Yender NOAA SSC NOAA Office of Response and Restoration/Damage Assessment Center 7600 Sand Point Way, N.E. Seattle, WA 98115 (206) 526-6081	

ACP Local (Continental US) Scientists List

Dr. James R. Payne Payne Environmental Services 1991 Village Park Way, Suite 206B Encinitas, CA 92024-1997 (760) 942-1015	**Dr. James P. Ray** Oceanic Environmental Solutions, LLC 16606 Aldenham Place Spring, TX 77379 (713) 992-1523
Dr. Jacqueline Michel Research Planning, Inc. 1121 Park Street (PO Box 328) Columbia, SC 29201 (29202) (803) 256-7322	**Dr. Edward S. Van Vleet** College of Marine Science University of South Florida 140 7th Avenue South St. Petersburg, FL 33701 (727) 553-1165
Dr. Christopher Reddy Associate Scientist Woods Hole Oceanographic Institution Marine Chemistry & Geochemistry Dept., MS #4 Woods Hole, MA 02543 (508) 289-2316	**Dr. Jerry Neff** Battelle National Laboratory 397 Washington Street Duxbury, MA 02332 (781) 952-5229
Dr. Edward H. Owens Polaris Applied Sciences 755 Winslow Way East, #302 Bainbridge Island, WA 98110-2483 (206) 842-2951 (cell: 206.369-3679)	**Dr. Gary Mauseth** Polaris Applied Sciences (same address as left) (425) 823-4841 (cell: 206.954-9648)

Dr. Paul Boehm Exponent 21 Strathmore Road Natick, MA 01760 (508) 652-8500	**Mr. Doug Helton** Spill Operations Coordinator NOAA Office of Response and Restoration/Damage Assessment Center 7600 Sand Point Way, N.E. Seattle, WA 98115 (206) 526-4563 **24-hour: (206) 526-4911**
Dr. Alan Mearns Senior Scientist NOAA Office of Response and Restoration/Damage Assessment Center 7600 Sand Point Way, N.E. Seattle, WA 98115 (206) 526-6336	

Ecotoxicology Experts (aquatic/sediment/PAHs, etc.) Great Lakes Region

Dr. Peter Landrum NOAA Great Lakes Environmental Research Lab (GLERL) 2205 Commonwealth Blvd. Ann Arbor MI 48105-2945 Telephone: 734-741-2235 Fax: 734-741-2055	**Dr. John P. Giesy** Michigan State University Department of Zoology Natural Science Building East Lansing, MI 48824 (517) 353-2000
Dr. Susan Fisher Ohio State University 420 Aronoff LB 318 W 12th Ave Columbus, Oh 43210 (614) 292 2133	**G. Allen Burton**, Jr**.,** Professor Director, Institute for Environmental Quality Department of Biology, 235A, BH Wright State University 3640 Colonel Glenn Highway Dayton, OH 45435 (937) 775-2201
Dr. David Mount (Branch Chief-Ecotoxicology) **Dr. Gary Ankley** (Ecotoxicology) EPA Mid-Continent Ecology Division 6201 Congdon Boulevard Duluth, MN 55804 (218) 529-5000	

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NIMS AND NRP ALIGNMENT CERTIFICATION CHECKLIST
(Local reproduction authorized)

Name of Plan: _____ **Date:** _____

Plan Holder (Unit): _____

Ref: (a) National Incident Management System (NIMS), 1 March 2004
(b) National Response Plan (NRP), December 2004
(c) Alignment with the National Incident Management System and National Response Plan, COMDTINST 16600.27 series
(d) United States Coast Guard National Incident Management System (NIMS) and National Response Plan (NRP) Implementation Plan, 29 December 2004

1. The following actions have been taken to align this plan with references (a) and (b), consistent with the guidance provided by reference (c). *(Check boxes as appropriate.)*

   [ ] This plan prescribes the use of the Incident Command System (ICS) as per the National Incident Management System (NIMS), reference (a).

   [ ] This plan meets the requirements of reference (a) or corrections have been made where practicable to address minor changes necessary for consistency with reference (a).

   [ ] This plan meets the requirements of reference (a) or corrections have been made where practicable to address minor changes necessary for consistency with reference (b).

   [ ] Supplemental pages listed as Attachments to this certification have been prepared and included as attachments to this certification to address NRP alignment issues beyond minor changes.

   [ ] This plan is scheduled for a formal revision to be completed by _____ *(insert required completion date)* in accordance with reference (d).

2. When this plan is executed, it will supplement the overarching core coordinating structures, processes, and protocols detailed in the NRP. Figure 1 of attachment (a) depicts the NRP coordinating structures specified by reference (a). This figure is included in this revised plan.

_____ *(Name of person responsible for changes)*

_____ *(Title)*

Attachments:
(a) - Structure for NRP Coordination

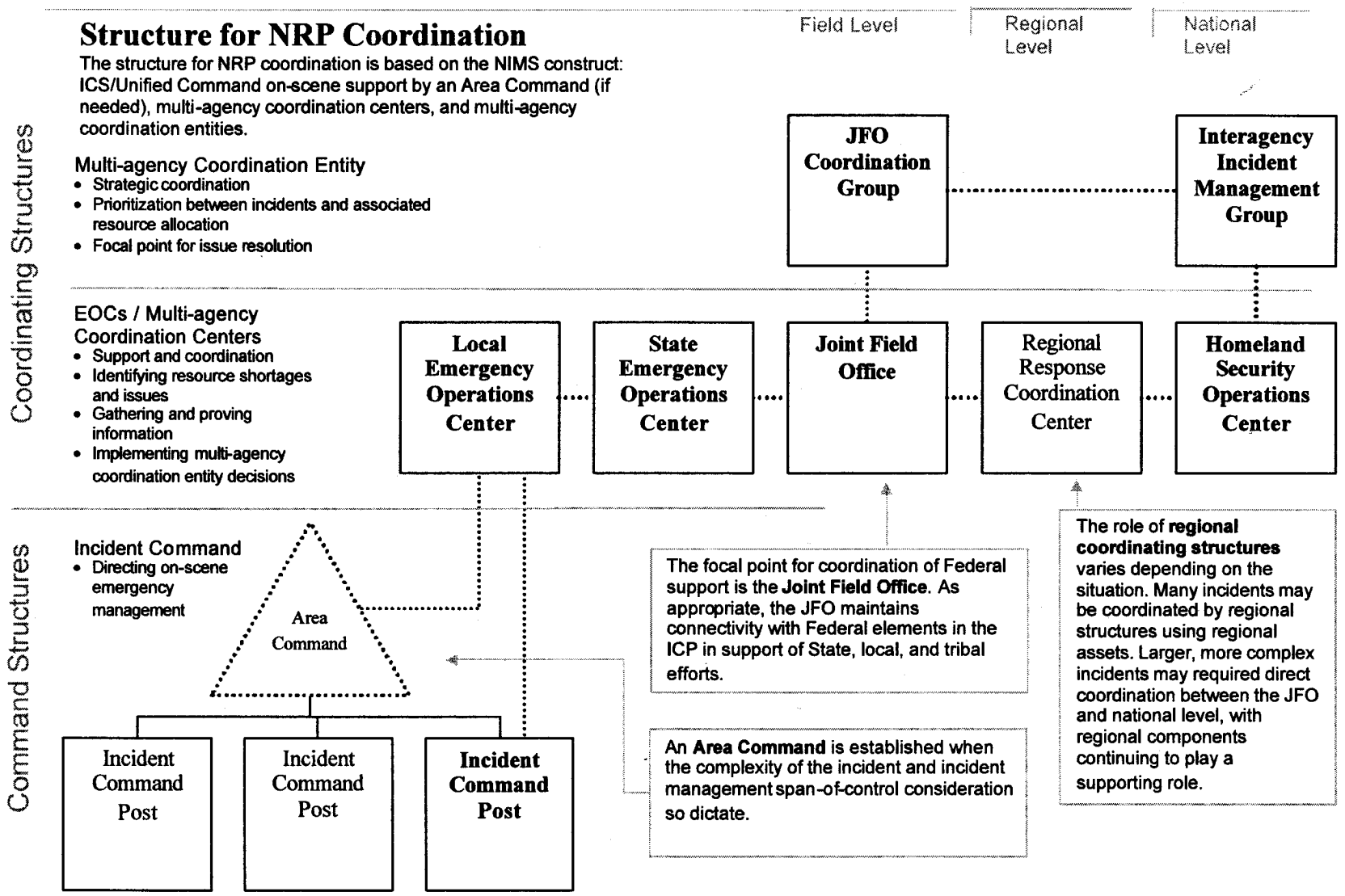

Figure 1 Coordinating structures from the National Response Plan

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Contingency Planning for Group V Oil (Non-Floating)

Introduction

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 for this Area Contingency Plan. The area committee should review this report and consider the conclusions and recommendations for response to spills of non-floating oils in their area of responsibility. It is available at www.nap.edu

Oils with a specific gravity greater than 1.0 (and some other oils in certain circumstances) may be neutrally buoyant or sink when spilled on water. Federal rules governing oil spill contingency plans categorize petroleum cargoes according to their physical properties. 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. Vessels and terminals that handle Group V oils are required to include responses to spills of Group V oils in their facility response plans.

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, seagrasses, and other benthic (seabed) and water column biota. Submerged oil may also cause episodic re-oiling of shorelines.

History of Spills

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.

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 the 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.

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 knowledge, especially at the local level, in responding to spills of non-floating oil is a large barrier 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.

The current level knowledge of how to respond to and plan for spills of non-floating oils is inadequate. Area committees need to develop inventories of equipment, specialized services and protection priorities for non-floating oils. Response plans at facilities that handle non-floating oils must also be tested during exercises and drills to ensure effective and efficient response.

MSU Toledo Group V Oil Facilities:

BP Products N.A. Inc. – Toledo Refinery: #6 fuel oil; all other products are lighter end products

Sun Oil - #6 fuel oil/Bunker C; carbon black oil, (heavy aromatic residual fuel, atmospheric crude tower bottoms may fall into this category); all other products are lighter end products

Michigan Paving - asphalt

Seneca - asphalt

Middleport Terminals - asphalt

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Funding Guidance for Oil Spills and Hazardous Materials Releases - Appendix B in the NPFC User Reference Guide

NOTE: for the most recent version of this document click on the following link: http://www.uscg.mil/npfc/urg/index.htm

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APPENDIX H

Funding Guidance for Oil Spills and Hazardous Materials Releases

April 2003

APPENDIX H

PURPOSE

This document is designed to assist Federal On-Scene Coordinators (FOSCs) during oil spill and other hazardous material responses. The intent of this document is to provide quick guidance on financial aspects of spill response issues. It is not intended to be an all-inclusive guide on spill management issues or on the rights and liabilities of polluters and those damaged by pollution as defined by the Oil Pollution Act (OPA) or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

APPENDIX H

Funding Guidance for Oil Spills and Hazardous Materials Releases

TABLE OF CONTENTS

I. WHAT IS THE OSLTF?

The Oil Spill Liability Trust Fund (OSLTF or Fund) is a billion-dollar fund established as a source of money to pay removal and certain other costs and damages resulting from oil spills or substantial threats of oil spills to navigable waters of the United States. The OSLTF is used for costs not directly paid by a responsible party (RP) or guarantor, including costs to respond to "mystery spills" for which there is no identified RP.

The United States Coast Guard's National Pollution Funds Center (NPFC), in Arlington, Virginia, manages the OSLTF.

II. ACCESS TO THE OSLTF

FEDERAL WATER POLLUTION CONTROL ACT OIL SPILL RESPONSE AUTHORITY

- Federal On-Scene Coordinators may access the OSLTF Emergency Fund to respond to an oil spill under the President's FWPCA authority (33 U.S. Code § 1321(c)).
- Removal of a discharge or prevention and mitigation of a substantial threat of a discharge of oil into or on the navigable waters, adjoining shorelines, and the Exclusive Economic Zone (EEZ).

WHO CAN ACCESS THE FUND

- **All Federal On-Scene Coordinators (FOSCs)** obtain immediate access to a funding account and ceiling for incident response by accessing the Ceiling and Number Assignment Processing System (CANAPS) on the Internet: www.npfc.gov/canaps (see page 5).
- **Other Federal, state, local, and Indian tribal government agencies** assisting the FOSC get reimbursable funding authority via a FOSC-approved Pollution Removal Funding Authorization (PRFA). NPFC will work with the FOSCs, the agencies, and the Incident Command (IC)/Unified Command (UC) to set PRFAs in place.
- **States** may opt to access up to $250,000 via the Oil Pollution Act's State Access provision. FOSCs still provide initial coordination of the request and subsequent oversight and coordination.
- **Federal Lead Administrative Trustees (FLATs)** may submit an Initiate Request to the NPFC to fund the initiation of a Natural Resource Damage Assessment (NRDA).
- **Natural Resource Trustees** designated by the President of the United States, state, territorial governor, or Indian tribal governing authority may submit natural resource damage (NRD) claims to the NPFC for NRD costs not paid by the RP.
- **Claimants** (individuals, corporations, and government entities) can submit claims for uncompensated removal costs or certain damages (natural resources, real/personal property, loss of profits, loss of subsistence use of natural resources, loss of government revenues, and increased costs of government services) caused by the oil spill to the NPFC if the RP does not satisfy their claims. NPFC adjudicates the claims and pays those with merit. RPs can submit claims provided that:

- the total of all response costs and damage claims exceed the RP's statutory limit of liability, or
- the spill was solely caused by a third party, an Act of God, or an Act of War.

COSTS FOR THE FOLLOWING CAN BE CHARGED TO THE OSLTF

- **Removal** – includes cleanup contractors (Oil Spill Response Organizations or OSROs), overtime for government personnel, equipment used in removal (generally at established standard rates or lease costs), testing to identify the type and source of oil, disposal of recovered oil and oily debris, and preparation of associated cost documentation
- **Natural Resource Damages** – refers to costs to restore, rehabilitate, replace, or acquire the equivalent of the injured resource; any interim lost use or diminution in value of the injured resource pending restoration; and the reasonable cost of assessing those damages
- **Claims** for removal and damages

LIMITATIONS TO ACCESSING THE OSLTF

- The maximum, per case, is $1 billion, or the balance in the OSLTF, whichever is less.
- Removal funding (including response to a substantial threat) and Initiate request funding are limited to the funds available in the OSLTF Emergency Fund that receives and additional $50 million on October 1st of each fiscal year.
- There is a maximum of $500 million per case to satisfy NRD claims and assessments.
- Initiation of NRDA costs may be paid out of the Emergency Fund, subject to its availability and the process through which the funding was requested.
- The discharge (or substantial threat of discharge) must impact navigable waters of the United States [including the 200-mile Exclusive Economic Zone (EEZ)].

III. NATIONAL POLLUTION FUNDS CENTER SUPPORT ROLE

SERVICES NPFC *CAN* PROVIDE DURING A SPILL

- Serve as troubleshooters and the spokesperson for all OSLTF access, documentation, and claims issues. NPFC personnel can be dispatched to the Incident Commander (IC). In a Spill of National Significance (SONS), NPFC may be called upon to head the Finance Section under the Unified Command System (UCS) or Incident Command System (ICS)
- Assure that the OSLTF ceiling for the FOSC's removal efforts remains adequate and is adjusted as needed
- Assist in tracking obligations against the ceiling
- Advise the FOSC of the remaining ceiling balance

- Advise and assist in RP identification
- Provide information concerning validity of an RP's Certificate of Financial Responsibility (COFR) and guarantor identity for vessel spills
- Provide information concerning RP limits of liability (LOL)
- Prepare and deliver, with FOSC concurrence, Notices of Designation (including appropriate advertising requirements) to RPs
- Advise the FOSC and act as the FOSC's spokesperson on any matters related to the RP's response to the Notice of Designation
- Oversee the RP's efforts to advertise for claims or arrange for NPFC to advertise if the RP fails to do so or if an RP has not been identified
- Help negotiate and execute Pollution Removal Funding Authorizations (PRFAs) with any other Federal, state, local or Indian tribal government agency that the FOSC decides to use as part of the incident response and work with representatives of other agencies to ensure that their cost documentation is adequate for approval of reimbursement and supports cost recovery from the RP
- Negotiate and execute any requested funding agreement for Initiation of Natural Resource Damage Assessments (NRDA) with the Federal Lead Administrative Trustee (FLAT); Initiate requests are handled directly between the NPFC and the FLAT, but NPFC personnel coordinate the preassessment activities of the NRDA with the FOSC
- Handle all OPA claims-related issues, assist the FOSC in documenting the incident's impact with respect to potential claims, notify all RPs and guarantors when there are multiple RPs and arrange for adjudication of claims either directly or by the RP and answer claims-related questions for the FOSC
- Provide guidance on gathering/consolidating daily cost data and preparing the daily cost estimate summary for inclusion in Pollution Reports (POLREPs)
- Provide financial advice and forms for daily resource cost documentation and ensure that Coast Guard resources participating under the FOSC’s direction satisfactorily complete this documentation and monitor and help troubleshoot cost documentation problems
- Provide legal advice, as required, in coordination with the relevant Command's servicing legal office

SERVICES THAT NPFC *CANNOT* PROVIDE DURING A SPILL

- NPFC case officers **do not** have contracting authority and cannot act as a contracting officer (KO). With the exception of contractor support for RP identification, support for commercial contracts for oil spill clean-up actions must come from the District staff or from the Maintenance and Logistics Command (MLC) contracting staff. This may require that a KO be temporarily assigned to the UCS/ICS.
- NPFC case officers **do not** act as the FOSC's general finance officer or logistics officer, **other than** in the capacity of designated UCS Finance Section Chief during a SONS.
- NPFC **does not** validate utilization of resources. It is important that the FOSC assign individuals under FOSC direction to validate and track personnel and equipment

employed during the spill response. This includes both Coast Guard and commercial resources used at specific clean-up sites and within the UCS/ICS. Generally, the individuals who validate the use of personnel and equipment are separate from the FOSC's pollution response on-scene representatives. **Other governmental agencies (OGAs)** must document their own costs of participation in order to be reimbursed under their PRFA agreements. Individuals responsible for validating resource utilization should, where possible, note the movement of OGA personnel into and out of a site.

IV. OPA RESPONSIBLE PARTY LIABILITY ISSUES

COFR REQUIREMENTS/ROLE OF GUARANTOR

- Prior to any vessel >300 gross tons operating in U.S. waters, the owner/operator must obtain a Certificate of Financial Responsibility (COFR). This COFR is only issued if the owner/operator provides evidence of financial responsibility to pay for removal costs and damages up to the vessel's limit of liability (LOL). A vessel's liability limit is based on its gross tonnage and vessel type (e.g., higher limits apply to tank vessels than cargo vessels).

- RPs are permitted to self-insure their financial responsibility requirements. In most cases that involve self-insurers, they also have other insurance through a guarantor who is contractually obligated to pay. In these cases, the U.S. government does not have OPA Direct Action Rights against the other insurer.

DETERMINING LIMITS OF LIABILITY

- When vessel identity is reported in a spill incident, NPFC will provide information regarding potential statutory LOL to which an RP may be entitled; however, entitlement to the LOL is not usually well defined until long after the response. This issue may be resolved in litigation.

- What happens if the RP can only pay to their LOL?

  - *The OSLTF will provide continued funding if the RP stands down or cannot pay.*

- What happens if the RP pays more than their LOL?

  - *The RP may submit a claim to the NPFC for excess removal costs and damages. The claim will be adjudicated according to the claims provisions in OPA and the claims regulation. The RP will be compensated for all excess removal costs and damages to which the RP is entitled under OPA.*

- Entitlement to the LOL is lost if the RP fails or refuses:

  - to report the incident as required by law

  - to provide all reasonable cooperation and assistance requested by the FOSC in connection with removal activities; or

  - without sufficient cause, to comply with an order issued by the FOSC

RP'S ROLE IN THE RESPONSE PROCESS

- **The RP has primary responsibility** for response to a spill incident, including setting up the ICS and joining with the FOSC and state on-scene coordinator (SOSC) in the UC.

- Even when the RP leads a reasonable response effort, **the FOSC is always in ultimate command** and may decide to direct specific action or, for whatever reason it is deemed necessary, actually take the lead role in the response.

- The RP faces challenges to balance their corporate response with the desires of the FOSC given cost, environmental, political, and public relations/media impacts. The FOSC's responsibility extends further than taking appropriate action if the RP's response is inadequate. The FOSC should be aware that the RP might request reimbursement from the OSLTF via the claims route if the RP exceeds the LOL or has a complete defense to liability. The FOSC should identify those times when a response may be inflated beyond the level necessary to ensure removal of the oil and should notify the RP and the NPFC of this observation.

RP'S ROLE IN THE CLAIMS PROCESS

- An RP has primary responsibility for handling claims, including advertising, adjudication, and payment.

- The RP may establish a claims office to serve the affected area for spills with large claims potential.

- If the RP is deficient, NPFC will perform the claims adjudication function and charge the cost to the RP.

- The NPFC will assure that all of the above responsibilities are met.

V. FUNDS MANAGEMENT

CANAPS

- The Ceiling and Number Assignment Processing System (CANAPS) automates and centralizes the creation and management of project numbers and ceilings for Federally funded responses initiated by Federal On-Scene Coordinators (FOSCs).

- CANAPS is a Web-based tool available at: http://www.npfc.gov/canaps

- CANAPS collects basic incident information via a user-friendly, Internet "wizard" and immediately assigns a project number and the requested spending ceiling – up to a preset limit. An email confirmation of the project number and ceiling is sent to the requesting FOSC. CANAPS then creates the required official message and releases it through the Coast Guard Messaging System (CGMS).

- A field user tutorial is available. The tutorial is a helpful, comprehensive document that steps users through the process of opening and modifying a Federal Project. The tutorial is available at:

  http://www.uscg.mil/hq/npfc/canaps/Tutorial/CANAPS_Field_Tutorial.pdf

- Ceiling and Project Limits
  - Federal Project Numbers (FPNs) can be opened by EPA and USCG FOSCs for the removal of oil using the Oil Spill Liability Trust Fund (OSLTF).
  - CERCLA Project Numbers (CPNs) can be opened by USCG FOSCs for the removal of hazardous substances using Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) funds. The EPA has its own process for opening Superfund projects outside of CANAPS.
  - The need to manage the respective funds requires limits to the amount of money that can be obligated automatically by the CANAPS system before having to speak to the National Pollution Funds Center (NPFC).
  - The USCG can open FPNs up to $500K and CPNs up to $249,999.
  - The EPA can open FPNs up to $250,000.
  - These thresholds are subject to change based on the availability of funds. Additional money is available. If the project is going to grow beyond these limits, contact the NPFC to request additional funding.
- User IDs and Passwords
  - Access to CANAPS is controlled by use of user IDs and passwords, which are administered by the NPFC and are specific to the FOSC's Unit or Region.
  - Access keys are changed quarterly.
- Demonstration Version
  - A demonstration version of the CANAPS software is available at: http://www.npfc.gov/canapsv2demo
  - The user ID for the demonstration version is Demo, and the password is DEMO.

CONSIDERATIONS FOR ESTIMATING THE TOTAL COSTS OF THE SPILL

- RP Limits of Liability (LOL)
  - An RP can't be assured LOL will hold until investigation and possible litigation are resolved.
  - An RP who holds a COFR and exceeds the established LOL is expected to continue the response and file a claim for the actual costs in excess of the LOL.
  - An RP's involvement – and the increased probability of cost recovery – is more likely with the presence of a COFR guarantor or "other insurer."
  - An RP's P&I coverage, the "other insurance," is often considerably greater than the LOL.

- RP Responsiveness
  - Media and public interest and political awareness often influence an RP's responsiveness.
- RP Spending Past LOL
  - RPs and their guarantors often continue to provide funding and support after exceeding the LOL (for which the RP may subsequently submit a claim to the NPFC for excess costs). The determination of whether or not this will be the case must be made as soon as it is feasible to minimize potential transition issues and to quickly estimate potential impacts to the OSLTF.
  - RP's spending and applicability of liability limits are usually not well defined until long after the response, especially in cases subject to litigation.

TRACKING DAILY BURN RATE FOR REMOVAL

- The FOSC tracks the daily costs (burn rate) for an incident. The RP may not be forthcoming with this data for legal or public relations reasons. These costs include:
  - costs incurred by the OSLTF **plus** USCG resource usage (personnel, equipment, Marine Safety Laboratory, etc.)
  - other government agencies (Federal, state, local) support costs
- Early warning is required to forecast ceiling increases so NPFC can estimate time to Fund depletion by tracking burn rates for each activity

NOTE: Regardless of whether the RP or the FOSC directs the response, government personnel, and equipment used in the response are considered a billable resource.

ANALYZING AND MONITORING POTENTIAL DAMAGE CLAIMS COSTS

- Typically, claims are presented long after removal is over. Claims must be first submitted to the RP. If the RP denies responsibility, or if 90 days passes without a settlement, claimants can submit the claim to the NPFC.
- Claims costs may be far greater than removal costs.
- Some key factors that drive up claims costs are:
  - area and length of time for fisheries closures [National Marine Fisheries Service (NMFS) may make this call]
  - affected traffic and length of time for shipping lane closures
  - population and commercial density of affected area
  - magnitude and length of time for business interruptions
  - extent of impact on environmentally sensitive areas

APPENDIX H

FUNDING CONSIDERATIONS FOR NRDAS

- FLATs may request obligation of funds from NPFC for NRDA initiation.
- Ceiling allocations and reimbursement for initiation of NRDAs are funded from the OSLTF Emergency Fund.
- Up-front or after-the-fact funding for assessment, restoration, and/or emergency restoration is available from the OSLTF through the claims process.
- Any natural resource trustee (Federal, state, or tribal) may submit claims for NRD.
- Claims payments are based on approved plans.
- SONS presents high potential that removal costs and other claims may consume most of the OSLTF prior to NRD needs being met

CEILING MANAGEMENT IN THE EVENT OF MULTIPLE INCIDENTS

- Two or more major spills (non-SONS) may deplete the Emergency Fund.
- The Emergency Fund apportionment of $50 million per annum occurs at the start of each fiscal year. The Fund is drawn down for the rest of the year and could be substantially depleted by late in the fiscal year.
- Starting in FY 2003, advancements of up to $100 million are available.

OSLTF EMERGENCY FUND ADVANCEMENT AUTHORITY

- **May supplement the Emergency Fund** – The Coast Guard was recently given authority to advance up to $100 million from the OSLTF to supplement Emergency Fund shortfalls.
- **Notification** – The Coast Guard must notify Congress within 30 days after an advance as to the amount advanced and the facts and circumstances necessitating the advance.
- **Impact on Responses** – This advancement authority does not provide for any new or different uses of the Emergency Fund for Federal response, but may help the Coast Guard ensure funds will be available for Federal response when needed and are not delayed when a costly response threatens the balance of the Emergency Fund.

FUNDING CONSIDERATIONS FOR MULTIPLE RP INCIDENTS

- Spill size alone does not determine the impact on the Fund. The RP's LOL, assets, and responsiveness are equally important.
- FOSCs must segregate all costs among incidents.
- Portions of discharged oil from multiple incidents could eventually co-mingle. RPs may need to decide how to pay claims resulting from the co-mingled oil, usually after removal operations cease.

FUNDING CONSIDERATIONS FOR MIXED OIL AND CERCLA INCIDENTS

- Presence of hazardous substances may create a mixed spill [co-mingled oil and hazardous substance(s)] or constitute a single response.

- A co-mingling scenario will generally be a Superfund response, although EPA and the USCG have not established a precise definition to distinguish between the two types of responses.
- A mixed site scenario requires that all costs be assigned to separate records for OSLTF or CERCLA cases. The FOSC must have both an FPN (Federal Project Number) for the OSLTF-funded removal actions and a CPN (CERCLA Project Number) for the hazardous substance response actions.

  NOTE: FPN/CPN generated by CANAPS
- When substances are not mixed, a single incident may also include a response that falls under OSLTF and CERCLA.
- The NPFC **cannot** pay claims for uncompensated removal costs or damages arising from a release of a hazardous substance.

VI. CLAIMS PROCESS

WHAT CLAIMS ARE COMPENSABLE

- uncompensated removal costs
- loss of profits or earning capacity
- net loss of Federal, state, or local government revenues
- net costs to state or local governments for increased public services
- loss of subsistence use of natural resources
- damages to real or personal property
- natural resource damages

RP'S ROLE

- The RP and guarantor will receive a Notice of Designation (NOD). The RP has five days to deny designation.
- If the RP does not deny the designation, they have 15 days to respond by advertising their designation and the procedures for submitting claims.
- The RP, if fully responsive to the requirements in OPA, will assume the entirety of claims responsibilities: advertising, receipt, adjudication, and payment of claims. The NPFC will monitor closely to assure compliance.
- Claimants (other than states submitting claims for uncompensated removal costs) must first present their claims to the RP or the RP's guarantor.
- State removal cost claims are permitted to go directly to the NPFC.
- A claimant can elect to commence action in court against the RP or present the claim to the NPFC if the RP does not settle a claim within 90 days after filing.

NPFC'S ROLE IF RP DENIES DESIGNATION OR IS UNKNOWN

- The NPFC, if assuming claims responsibility, will arrange for advertising, receipt, adjudication, and payment of claims.
- The NPFC will assume claims responsibility if the RP denies designation; if the RP's claims response does not comply with OPA; or if the RP cannot be identified.
- The NPFC also accepts claims when the claimant has presented a claim to the RP and the RP does not settle it within 90 days of presentment.

NEED FOR ON-SITE CLAIMS OFFICE

For a major spill, either the RP or the NPFC may establish one or more claims offices in the area of greatest impact.

REQUIREMENT TO PAY INTERIM CLAIMS

- Either the RP or the NPFC can pay interim claims with appropriate documentation.
- An interim payment does not limit a claimant's right to claim for other damages not paid or addressed under the interim claim.

IMPORTANCE OF ADDRESSING CLAIMS ISSUES IN PRESS RELEASES

- Damaged parties are major public affairs clients.
- NPFC will provide information to help the Joint Information Center (JIC) educate the public. This may be a copy of the RP's advertisement and explanation of the RP's claims process and/or copies of the NPFC Claimant's Guide and phone numbers.
- Claims will be paid more quickly if the public knows the procedures. The need for good documentation by the claimant is especially important and is something that should be stressed in press releases.

VII. NATURAL RESOURCE DAMAGES

DEFINITION

"Natural resources" includes land, fish, wildlife, air, water, ground water, surface water, and other such resources belonging to, managed by, held in trust by, pertaining to, or otherwise controlled by the United States [including Exclusive Economic Zone (EEZ) resources], any state or local government or Indian tribe, or any foreign government.

WHO ARE THE NATURAL RESOURCE TRUSTEES

FEDERAL

- Department of Agriculture
- Department of Commerce
- Department of Defense
- Department of Energy
- Department of the Interior

STATE

State trustees are any state agency designated by the state's Governor to serve as the natural resource trustee.

TRIBAL

Tribal trustees are federally recognized tribes that have governmental authority over lands. This does not include Alaska native regional or village corporations.

ROLE OF TRUSTEES IN THE FUNDING PROCESS

- Trustees must coordinate with each other during all phases of NRDA to ensure no double recovery of damages.
- In the pre-assessment phase of a NRDA, all affected trustees must select a Federal Lead Administrative Trustee (FLAT), who is then responsible for coordinating the effort and submitting necessary paperwork to NPFC.
- Trustees assess damages for "injury to, destruction of, loss of, or loss of use of" natural resources.
- Trustees develop restoration alternatives to address any injury to natural resources, from which they select the most appropriate alternative to implement.
- Trustees must also coordinate with the FOSC during the NRDA process to avoid interference with the ongoing response.

COMPENSABLE NATURAL RESOURCE DAMAGES

- Costs to restore, rehabilitate, replace, or acquire the equivalent of the injured resource
- Any interim loss of use or diminution in value of the injured resource pending restoration
- The reasonable cost of assessing NRD damages

COORDINATION FOR NRD WITH THE RESPONSIBLE PARTY

- The RP has primary responsibility to pay all of the costs/damages listed in previous sections.
- The trustees are encouraged, but are not required, to first seek Initiate funding from the RP for pre-assessment activities.
- Trustees must first present claims to the RP or the RP's guarantor. If the RP is not responsive and/or refuses to pay, trustees can come to the Fund for relief.
- If the RP does not settle a claim within 90 days after filing, a claimant can elect to commence action in court against the RP or present the claim to the NPFC.

NRD CLAIMS PROCESS – ROLE OF OSLTF/NPFC IF RP DOESN'T PAY

- If the NPFC assumes claims responsibility, then NPFC will arrange for receipt, adjudication, and payment of claims.
- A contractor may be hired to analyze the supporting information submitted by the claimants.

NRD IMPACT ON THE LIFE CYCLE COST OF SPILL

- Natural resource damage costs can become substantial.
- Damages in environmentally sensitive areas (e.g., wetlands) may be very costly. Many variables figure into the overall cost, including the nature of the product spilled, duration of spill, time of year, response-related conditions, etc.
- Costs may not be known or estimable for months or years after the response is complete.

VIII. CERCLA / WEAPONS OF MASS DESTRUCTION

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) FUND USE CRITERIA

- The spilled substance must be a hazardous substance, pollutant, or contaminant.
- The substance cannot be oil; if oil is contaminated with CERCLA substances, then it is a CERCLA substance (e.g., oil contaminated with PCBs).
- The substance must impact land, water, or air in U.S. states, territories, possessions, and the EEZ.
- The substance must pose an imminent and substantial threat to public health or welfare.
- Immediate emergency response is necessary.
- CERCLA allows the FOSC to pre-position response assets, such as the Strike Teams, when there is potential for an incident involving a vessel offshore.
- CERCLA allows Coast Guard and EPA FOSCs response flexibility in dealing with threats of an unknown nature (e.g., an anthrax response).

LEGAL/REGULATORY FRAMEWORK FOR RESPONSE

- The Commanding Officer of the Marine Safety Office (MSO) is the pre-designated FOSC and is in charge of the response.
- CERCLA, as amended, is the statutory basis for response.
- Response operations must comply with the NCP.

NON-COAST GUARD PARTICIPANTS

- The funding process for the OSLTF and CERCLA, from the FOSC perspective, is the same. When the FOSC accesses the Superfund for response, the full resources of the NCP are at his/her disposal.
- The FOSC can hire contractors through BOA agreements or new contracts.
- The FOSC, as with oil spills, can provide funding to Federal, state, and local government responders through incident-specific PRFAs.
- For CERCLA cases, costs are tracked and RPs are billed for those costs. CERCLA does not, however, have the same claims provisions as OPA. Generally, CERCLA does not pay claims filed by injured third parties who must pursue damages through the courts.

IX. STAFFORD ACT / FEMA

STAFFORD ACT FUND USE CRITERIA

- There must be a Presidential Declaration of Disaster (natural or other).
- The affected state that has requested assistance will contribute matching funds.
- FEMA has to issue a Mission Assignment (MA) to the Coast Guard identifying the work to be done and authorizing spending.
- Use of Stafford Act funds 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).

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 Federal Response Plan (FRP)- 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 Mission Assignments, 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 (State Match) requirement. (e.g., this was done for the World Trade Center and the Shuttle Columbia responses).

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 materials responses.
- Coast Guard Stafford Act responses must have an approved FEMA Mission Assignment (MA) in place or the Coast Guard 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 BOA Agreements.
- 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.

X. TERRORISM AND FEDERAL RESPONSE AUTHORITY

- Whether terrorism or any other criminal act is the cause of an oil spill does not affect the President's authority to respond to the spill or use the OSLTF Emergency Fund in that response, nor does not affect the applicability of the OPA Title I liability and compensation regime. The OSLTF is available to pay if the responsible party does not pay removal cost and damages claims.
- Terrorism or other criminal acts that cause an oil spill MAY present a liability defense. Such acts that cause a spill may give rise to a defense from OPA liability for responsible parties (e.g., owners or operators of vessels) if certain defense criteria are met. Whether a defense may apply often requires a fact-intensive analysis and often cannot be resolved until the circumstances of the spill have been fully investigated.

APPENDIX H

ADDITIONAL REFERENCES

Available via http://www.uscg.mil/hq/npfc

- NPFC User Reference Guide – available on CD-ROM
- Interim Claims Regulation
- Claimant Guide
- Supplemental Claims Guidance
- Natural Resource Damage Funding Guidelines
- Technical Operating Procedures
  - Resource Documentation
  - Removal Cost (Oil)
  - Removal Cost (CERCLA)
  - Designation of Source

APPENDIX H

ACRONYM LIST

BOA	Basic Ordering Agreement
CANAPS	Ceiling and Number Assignment Processing System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CGMS	Coast Guard Messaging System
COFR	Certificate of Financial Responsibility
CPN	CERCLA Project Number
EEZ	Exclusive Economic Zone
EPA	U.S. Environmental Protection Agency
ESF-10	Emergency Support Function #10 (Hazardous Materials Annex – Federal Response Plan)
FCO	Federal Coordinating Officer
FEMA	Federal Emergency Management Agency
FLAT	Federal Lead Administrative Trustee
FOSC	Federal On-Scene Coordinator
FPN	Federal Project Number
FRP	Federal Response Plan
FWPCA	Federal Water Pollution Control Act
IC	Incident Commander
ICS	Incident Command System
JIC	Joint Information Center
KO	Contracting Officer
LOL	Limit of Liability
MA	Mission Assignment
MLC	Maintenance and Logistic Command
MSO	Marine Safety Office (USCG)
NCP	National Contingency Plan
NMFS	National Marine Fisheries Service
NPFC	National Pollution Funds Center
NOD	Notice of Designation
NRD	Natural Resource Damage
NRDA	Natural Resource Damage Assessment
OGA	Other Government Agency(ies)
OPA	Oil Pollution Act
OSLTF	Oil Spill Liability Trust Fund (the Fund)
OSRO	Oil Spill Response Organization
P & I	Protection and Indemnity Insurance
PCB	Polychlorinated biphenyls
PRFA	Pollution Removal Funding Authorization
POLREPS	Pollution Reports
RP	Responsible Party
SCO	State Coordinating Officer
SOSC	State On-Scene Coordinator
SONS	Spill of National Significance
UC	Unified Commander
UCS	Unified Command System
USCG	United States Coast Guard

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