

Natural Disaster Oil Spill Removal

United States Environmental Protection Agency (EPA) Region 6, United States Coast Guard (USCG), Texas General Land Office (TGLO) & Texas Commission on Environmental Quality (TCEQ) Disaster Response Procedures

1.1 Purpose

1.1 Oil Spill Removal Group Purpose: To efficiently document, contain, recover and mitigate oil discharges with minimal impact to the environment. Oil discharges pre-existing the disaster cannot be removed under the Stafford Act mission.

2.0 Objective

2.1 Oil Spill Removal Objective: Physically remove/recover oil as defined by the National Contingency Plan and the Oil Pollution Act of 1990 (OPA 90) at each location. Communication between Group Supervisor and Team Leaders should foster efficient removal operations with minimal impact to the environment and provide situational updates to the Unified Command as required.

Note: Only federal government representatives may supervise federal contractor personnel and only state government representatives may supervise state contractor personnel.

3.0 Oil Spill Removal Group Structure

3.1.1 Oil Spill Removal Group Supervisor- Responsible Party-Led (RP) Clean Up

To the greatest extent possible, agencies should identify responsible parties that contribute to an oil spill during a natural disaster. All spills with identified responsible parties should be monitored by federal or state agencies during a declared disaster. It is appropriate for agencies to utilize Stafford Act funding to cover over sight cost.

The Oil Spill Removal Group Supervisor (Responsible Party-Led) will work for the Response Branch or similar entity under the Operations Section. The Oil Spill Removal Group Supervisor (Responsible Party-Led Clean Up) should be a qualified FOSCR, and the Group may consist of multiple teams and will be directed by the Group Supervisor. The Group Supervisor will oversee the RP clean up teams and the documentation of operations conducted in the field. The RP-Led Clean Up Group Supervisor will plan daily field operations for the RP-Led Teams and will ensure that assignments and maps are prepared and made available to the Team Leaders on a daily basis. The Group Supervisor will work directly with the Branch Director and Operations Section Chief on complex field issues such as clean up end points and in closing out USGS grids.

3.1.2 Oil Spill Removal Group Supervisor – Stafford-Led Clean Up

Spills with no identified responsible parties should be mitigated by federal or state agencies in response to a declared disaster utilizing Stafford Act Funding. CERCLA and OPA funding should only be used for incidents that pre-existed the natural disaster. For those types of incidents agencies should follow normal procedures for addressing incident. Unified Command may elect to track these incidents concurrently with Stafford Funded incidents. Before a Stafford funded

clean up can occur, all appropriate documentation and procedures shall be followed and approved by the Incident Specific Federal On-Scene Coordinator or Unified Command before action can be taken.

For example: Initiate contact with responsible party (Notice of Federal Interest). Wait for pre-determined time period for response from RP. If no response, proceed with Stafford funding (e.g. Authorization to Proceed) to mitigate impact to the environment.

NOTE: There may be a delay in when a spill is observed and an RP is identified. Depending on the size of the spill, impact or potential impact of the spill Unified Command may elect to take proactive steps to mitigate the spill. This does not prevent Unified Command to then transfer responsibility back to an RP.

The Oil Spill Removal Group Supervisor (Stafford-Led) will work for the Response Branch or similar entity under the Operations Section. The Oil Spill Removal Group Supervisor (Stafford-Led Clean Up) should be a qualified FOSCR or SOSOC, and the Group may consist of multiple teams and will be directed by the Group Supervisor. The Group Supervisor will oversee all of the clean up teams and will oversee the documentation of all operations conducted in the field. The Stafford-Led Clean Up Group Supervisor will plan daily field operations for the Stafford-Led Teams and will ensure that assignments and maps are prepared and made available to the Team Leaders on a daily basis. The Group Supervisor will work directly with the Branch Director and Operations Section Chief on complex field issues such as clean up end points and in closing out USGS grids. Additionally, the Group Supervisor will be responsible for providing all information for SITREPs and POLREPs as required and approved by the Unified Command.

3.1.3 Oil Spill Removal Team Composition

Oil Spill Removal Teams will consist of multiple types of personnel and equipment based on the type of operation to be conducted. It is the Group Supervisor's responsibility to make sure that teams are equipped with the appropriate personnel and equipment. A typical Oil Spill Removal Team may consist of (1-2) Federal representatives, (1-2) appropriate State representatives, and multiple Oil Spill Removal Organization (OSRO/BOA/DCO) personnel as required. The Federal representative will serve as the Team Leader and will deliver assignments, provide oversight and interact with the public. The State representative may assist the team in area familiarization, best and prior practices and assist in the documentation of the recovery.

4.0 Oil Spill Removal Group Procedures and Resources

4.1 Oil Spill Removal Group Supervisor – (RP-Led & Stafford Fund-Led)

The Oil Spill Removal Group Supervisor (RP-Led & Stafford Fund-Led) is in charge of overall field operations for their teams. They need to assist the Oil Spill Removal Team Leaders with map requests and with basic planning and implementation of their team's field operations.

4.1.2 Oil Spill Removal Team Leaders

- RP-Led Clean Up Removal Team Leaders are responsible for the oversight of the recovery operations at a Responsible Party-Led clean up. Team leaders should make contact with an appropriate representative from the spill site & enforce pre-determined clean up endpoints and procedures developed by the Unified Command and signed by all agencies involved. Team Leaders will ensure that the crew has proper PPE and communication capability via cell phone or radio.

Team Leaders are to stay in contact with the Group Supervisor for planning purposes and to ensure that the Team Leader has all the necessary assignments, maps, etc on a daily basis. Team leaders will ensure that the PDA has been synched the morning prior to field use, and the most up-to date maps with correct layers for the correct area, that depict the spill location(s). Teams that do not have a PDA should utilize printed spreadsheets that provide information about the spill site. Daily updates of the progress of the clean up should be documented on PDAs, on the Field Data Collection Sheets, and/or ICS-214B for progression and situation updates.

- Stafford Fund-Led Clean Up Team Leaders are responsible for the oversight of the recovery operations for their teams and OSRO conducting the clean up. The Team Leader will hold a Federal On-Scene Coordinator's Representative Qualification or designation letter by the Unified Command. The team leader shall document all equipment and follow all procedures outlined by the National Pollution Fund Center (NPFC) Finance and Resource Management Field Guide (FFARM). Team Leaders will ensure that the crew has proper PPE, communication capability via cell phone or radio, and access to the appropriate equipment for the planned recovery tasks scheduled for the day. Team Leaders are to stay in contact with the Group Supervisor for planning purposes and to ensure that the Team Leader has all the necessary assignments, maps, etc on a daily basis. Team leaders will ensure that the PDA has been synched the morning prior to field use, and the most up-to date maps with correct layers for the correct area, that depict the spill location(s). Teams that do not have a PDA should utilize printed spreadsheets that provide information about the spill site. Daily updates of the progress of the clean up should be documented on PDAs, on an Oil Spill Assessment Field Data Collection Sheet, and/or ICS-214B for progression and situation updates.

4.1.3 Oil Spill Removal Team Documentation

The Oil Spill Removal Team Leader (RP-Led & Stafford Fund-Led) will be in charge of all field documentation for their team. The Team Leader needs to ensure the following:

- If used, all PDAs for field use have been synched appropriately.
- Check field kit and replenish with necessary supplies.
- Check batteries in GPS unit, camera, and any other necessary equipment.
- Attend morning Health & Safety meeting.
- Meet with OSRO assigned to your Removal Team to discuss meeting point and caravan instructions.
- Obtain set of maps with oil spill locations.
- Document removal of oil and closure of locations as specified in Section 5.1.1 of this SOP. Fill out information in Response Manager via PDA, laptop or Field Data Collection Sheets.
- Return from field and write up daily 214B documenting recovery activities as described in Section 5.1.2 of this SOP. Convene with Division/Group/Supervisor

to discuss progress for the day, items recovered, and obtain plan for following day activities.

- Provide a copy of the 214B to the Group Supervisor and to the Documentation Group. Turn in photos to the Documentation Group. Turn in PDA to the IT Group for syncing and recharge.

5.1 Removal Procedure for Documenting Removed Targets

Progress at each site (RP & Federal Fund Led cleanups) will be updated at the conclusion of each work day using the parameters in the Response Manager Program.

Once a clean up has met all endpoints, developed by the Unified Command, from a location, Team Lead will close the facility in Response Manager:

- Look up the location to be closed in the PDA. Confirm the location number for the site.
- Review the items listed in the PDA or printed sheet.
- Change the site status from “Open” to “Clean up Completed (Closed)”.
- **Save the entry update.**

5.1.2 214B Documentation

Each Team Leader is responsible for completing a 214B at the end of the end of the field day. The Team Leader is responsible for assigning the completion of the 214B. The 214B should include essential information so that the Branch Director/Operations Section Chief can have a daily report on the progress of the Oil Removal Group. An example of a properly filled out 214B form is located in the attachments. The 214B should include:

- Team members
- Team needs/excess resources
- Out of the ordinary experiences
- Health and Safety Issues
- Team accomplishments
 - Each grid number/area fully covered including County/City information.
 - Items opened/closed in each grid/area, and special requirements for recovering the items.
 - A general overview statement summarizing daily findings and activities to report to the Branch Director/Operation Section Chief.

6.0 Maps

6.1 Requesting Maps:

- The Oil Spill Removal Group Supervisor should order maps by 1500 hours each day in order for the GIS Unit to produce the maps by 0600 hours the following day. This is

especially important during large responses with a high demand for maps throughout ICS.

- The GIS Unit is capable of customizing maps to meet the needs of various groups. It is important that the individual requesting the maps effectively communicates which “layers” the maps should show in order to be useful. Suggestions on effective layers follow in Section 6.2 of this SOP.

6.2 Map Layer Requirements:

- EPA GIS grid overlay – not actual lat/long lines. Grid lines should depict boundaries to the second decimal degree ie. 33.54 and -101.94 (rather than an actual point such as 33.546172, -101.945739).
- County/Parish boundaries
- Bodies of water
- Field teams in both RP and Fund Led Recovery should have 2 sets of maps: large scale(multi-grid navigational overview) maps and small scale (individual grid/quadrant) maps.
- Large scale maps provide a location frame-of-reference for driving directions, while smaller scale grid maps are used to perform thorough assessment.
- Small scale individual grid/ quadrant maps should show open spill locations with associated unique identifying nomenclature (“Spill/facility Name”) written beside each red dot. This prevents Assessment teams from producing double entries on already open Orphan Containers and allows Orphan Container Recovery teams to close out the correct Orphan Container location.

6.2.1 Aerial Recon Over-Flight Maps

- Layers on maps utilized in aerial recon should include landmarks such as highways, football fields, treatment plants, towns – anything that can serve as a useful reference point visible from the air. Two types of maps are necessary for aerial oil spill assessment, Large multi-grid navigational maps and multiple individual grid maps for the flight path. See attachment for example.

6.2.2 Ground Maps

- Layers for maps utilized in ground recon and recovery should include highways, city streets, county/parish boundaries, cities, water bodies, wetland areas. It is important to have layers which show areas not accessible by car and foot such as lakes, canyons, large landfills, and large sections of restricted private property (such as gated and guarded chemical plants).

6.2.3 Waterway Maps

- Layers on maps utilized in water recon and recovery should show layers which allow boat captains to navigate watercraft. Layers showing oyster beds, sandbars, water depth, and boat docks are useful. Waterway maps should have environmental sensitive layers so that oil spill removal teams can determine what

spills are located in wetlands, etc. The large scale map should show roadways which provide access to docking and launching locations.

- The local Coast Guard and/or General Land Office should have a contingency plan with many helpful navigational reference points.

6.2.4 Wetland Tactical Map

Oil removal in wetlands or marshes shall be conducted in accordance with the incident's marsh or wetland's plan. The recovery of oil spills and containers located within wetland environments require pre-planning. This planning process produces a map for recovery teams to use that depict items/spills to be recovered, acceptable access points, and sensitive environments.

7.0 Safety in the Field

7.1 All ICPs, Branches/Divisions will have a Health & Safety Officer (HSO). All health and safety is managed by this officer. The HSO will be able to provide overall field health and safety. The HSO will also have job aids/job safety analysis/hazard analyses available for the teams. The HSO may have on site H&S officers from other agencies or contractors that will work together as a team. The HSO reports directly to the Unified Command. The HSO can stop operations at any time they deem necessary due to safety concerns.

9.0 Information Sharing

EPA/TGLO/TCEQ will staff agency specific positions within the USCG Incident Command Post (Example: Merrell Center ICP during Hurricane IKE).

All information, data, maps, reports, photographs or any other information shall be shared with the responding agencies (USEPA, USCG, TCEQ and TGLO).

Information will be documented using the Facility/Spill Assessment Field Data Sheet and entered into Response Manager.

ATTACHMENTS:

ICS 214B EXAMPLE

ICS 204 FORM EXAMPLE

GIS MAP REQUEST FORM

AIR OPERATIONS REQUEST FORM

MULTI-GRID NAVIGATIONAL MAP EXAMPLE

INDIVIDUAL GRID/QUADRANT MAP EXAMPLE

FACILITY/SPILL ASSESSMENT FIELD DATA COLLECTION SHEET

ORPHAN CONTAINER HAZARD EVALUATION FIELD DATA COLLECTION SHEET