

INCIDENT SPECIFIC ARRT ACTIVATION

QUICK RESPONSE GUIDE

PURPOSE: This document provides the process and guidelines for activation of an incident-specific ARRT team, in accordance with the NCP¹.

BACKGROUND:

The Alaska Regional Response Team has duties outlined in the NCP, to provide support during a response to an oil or hazardous substance spill or release. The NCP provides information concerning what conditions should exist for the RRT to be activated and what services would likely be expected during activation.

NOTE: This document provides guidelines on the procedures for activation of an incident-specific team and is not intended to inhibit or impede agency-to-agency requests. The role of the incident-specific team is determined by the operational requirements of the response to a specific discharge or release. Participation by RRT members will relate to the technical nature of the incident and its geographic location.

TASKS DIRECTED TO THE RRT:

- Monitoring and evaluation of reports from the OSC/RPM; advise the OSC/RPM on the duration and extent of response; and recommend specific response actions.
- Request that other federal, state, local governments, or nongovernmental organizations provide resources under their existing authorities;
- Help the OSC/RPM prepare information releases for the public and for communication with the NRT.
- Review major policy issues with regard to response actions for:
 - dispersants usage in case by case area
 - in-situ burning
 - use of surfactant cleaners
 - use of solidifiers
 - use of Bioremediation
- If circumstances warrant, make recommendations to the regional or district head of the agency providing the OSC/RPM that a different OSC/RPM should be designated; and
- Submit reports to NRT as significant developments occur.

RRT COMPONENTS:

Standing RRT - Role of the standing RRT includes evaluation of communication systems and procedures, planning, coordination, training, evaluation, preparedness, and related matters on a region-wide basis.

Incident-specific RRT- Formed from the standing team when the RRT is activated for response
The role of an incident-specific RRT is determined by the operational requirements of the response.

- May be activated when response exceeds capabilities of the Area where it occurs, transects state boundaries, or may pose a substantial threat to public health or welfare or the environment.
- May also be activated upon a request by the FOSC or any RRT representative.
- May be used to assist the FOSC in obtaining additional federal resources.
- May also monitor and evaluate reports from the FOSC, advise the FOSC on the duration and extent of the response, recommend specific actions related to the response, assist the FOSC in preparing information for the public, and, if necessary, recommend the appointment of a different FOSC for the response.

¹ National Oil and Hazardous Substance Contingency Plan (NCP), 40 CFR, Part 300, September 15, 1994.

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SECTION 1. <u>Type of Situation:</u>	
<input type="checkbox"/>	Has there been a request by the FOSC or SOSC to the RRT Co-Chair lead Agency (with jurisdiction) to activate the RRT?
<input type="checkbox"/>	Has there been a request by an RRT member to the RRT Co-Chair lead Agency (with jurisdiction) to activate the RRT?
<input type="checkbox"/>	Has there been an oil discharge or hazardous material release which may pose a serious threat to the public health, welfare, the environment, or to regionally significant amounts of property?
<input type="checkbox"/>	Is the incident an oil discharge or hazardous material release that is or has the potential to be a worst case discharge ² , (determined by the RPIC or other Unified Command member)?
<input type="checkbox"/>	Other:
SECTION 2. Who <u>Chairs of the Incident Specific RRT?</u>	
	Chaired by lead Agency (agency that provides FOSC for spill)
<input type="checkbox"/>	EPA
<input type="checkbox"/>	USCG
<input type="checkbox"/>	DOD
<input type="checkbox"/>	DOE

² Worst Case Discharge (WCD) planning volumes are calculated using specific formulae depending on the source of the release outlined in relevant regulations, and are typically based on maximum storage, transfer and production volumes as well as pump rates or oil types: Vessels - 33 CFR 155 Appendix B; Onshore Storage and Production Facilities - 40 CFR 112, App D; Onshore Pipelines – 49 CFR 194.105; Offshore Facilities – 30 CFR 254.47

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SECTION 3. RRT Activation Process:	
<input type="checkbox"/>	Step 1: OSC or designated representative provides a brief summary of issues to either EPA or USCG RRT Co-Chair. (determined by jurisdictional boundaries)
<input type="checkbox"/>	Step 2: The RRT Lead Agency Co-Chair, in consultation with others as needed, decides to activate the RRT and identifies participating agencies. Select participating agencies below:
<p>Co-Chairs</p> <p><input type="checkbox"/> U.S. Coast Guard, District 17</p> <p><input type="checkbox"/> U.S. Environmental Protection Agency, Region 10</p> <p><input type="checkbox"/> State of Alaska (ADEC)</p> <p>Members</p> <p><input type="checkbox"/> Department of Agriculture (U.S. Forest Service)</p> <p><input type="checkbox"/> Department of Commerce (NOAA)</p> <p><input type="checkbox"/> Department of Defense (ALCOM)</p> <p><input type="checkbox"/> Department of Energy</p> <p><input type="checkbox"/> Department of Justice</p> <p><input type="checkbox"/> Department of Labor (OSHA)</p> <p><input type="checkbox"/> Department of Transportation (FAA)</p> <p><input type="checkbox"/> Department of Homeland Security (FEMA)</p> <p><input type="checkbox"/> Department of Health and Human Services (ATSDR)</p> <p><input type="checkbox"/> Department of Interior</p> <p><input type="checkbox"/> General Services Administration (GSA)</p>	<p>SCP Workgroup Members</p> <p><input type="checkbox"/> US Fish and Wildlife Service</p> <p><input type="checkbox"/> National Marine Fisheries Service</p> <p><input type="checkbox"/> USCG Port Zone</p> <p><input type="checkbox"/> Alaska Department of Environmental Conservation</p> <p><input type="checkbox"/> Bureau of Safety and Environmental Enforcement</p> <p><input type="checkbox"/> Alaska Department of Fish and Game</p> <p><input type="checkbox"/> U.S. Department of Interior</p> <p>Tribes/Communities</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p>Other</p> <p><input type="checkbox"/> _____</p>
<input type="checkbox"/>	Step 3: RRT Lead Agency Chair directs staff (RRT Coordinators / Command Centers) to set up a phone conference to formally initiate activation. (Using NRC or other connection to set up teleconference line for number of members expected to call in, see Section 6). Call-in Time, Number: _____
<input type="checkbox"/>	Step 4: RRT Lead Agency Co-Chair initiates an activation meeting for all participating members (see Section 7 Points of Contact).

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	<input type="checkbox"/> Staff directed to call and email or fax all members expected to participate in the activation with the teleconferencing information and a short synopsis of the situation. (see attached example).
	<input type="checkbox"/> All other members of the RRT, the NRT Chair, and Alaska Department of Environmental Conservation are to be notified by e-mail with a general synopsis of the situation.
<input type="checkbox"/>	Step 5: During the initial phone conference, the RRT Lead Agency Co-Chair has available and will provide the following information:
	<input type="checkbox"/> Designation of lead agency Co-Chair for the activated RRT.
	<input type="checkbox"/> Reason for and background of the activation;
	<input type="checkbox"/> Status of the incident and the response, as known;
	<input type="checkbox"/> Relevant RRT activities to date;
	<input type="checkbox"/> The agencies/states involved and why they were selected;
	<input type="checkbox"/> For all cases that involve dispersant decisions the following citation from the NCP should be read for clarification: 40CFR300.915(b) <i>For spill situations that are not addressed by the preauthorization plans developed pursuant to paragraph (a) of this section, the OSC, with the concurrence of the EPA representative to the RRT and, as appropriate, the concurrence of the RRT representatives from the states with jurisdiction over the navigable waters threatened by the release or discharge, and in consultation with the DOC and DOI natural resource trustees, when practicable, may authorize the use of dispersants, surface washing agents, surface collecting agents, bioremediation agents, or miscellaneous oil spill control agents on the oil discharge, provided that the products are listed on the NCP Product Schedule.</i>
	<input type="checkbox"/> For all cases that involve in-situ burning agent decisions the following citation from the NCP should be read for clarification: 40CFR300.915 (c) <i>The OSC, with the concurrence of the EPA representative to the RRT and, as appropriate, the concurrence of the RRT representatives from the states with jurisdiction over the navigable waters threatened by the release or discharge, and in consultation with the DOC and DOI natural resource trustees, when practicable, may authorize the use of burning agents on a case-by-case basis.</i>
<input type="checkbox"/>	Step 6: The Lead Agency Co-Chair of the activated RRT will lead discussions and decisions on the following:
	<input type="checkbox"/> Specific information and assistance requests to be made to other agencies and the state by the incident-specific RRT and the point person for those activities.
	<input type="checkbox"/> Communication mechanism and schedule for briefing participating member agencies/states with planned response actions from Unified Command.
	<input type="checkbox"/> Identification of Incident Command Center responsible for support of the activated RRT; (i.e. EPA, CCGD17 or State Operations Centers).
	<input type="checkbox"/> Prioritization of requests and established deadlines for completion of tasks;
	<input type="checkbox"/> Identification of point of contact for providing updated information to each member agency/state;
	<input type="checkbox"/> Dissemination of Lead Agency Co-Chair's 24 hour contact information;

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RRT Activation Example E-Mail/Message

SUBJ: Activation of ARRT for EPA Thermo Fluids response in Fairbanks, AK -TODAY @ 10 am AST

TO: *Alaska RRT* –

EPA Region 10 Federal On Scene Coordinators John Smith and Jane Jones are requesting an activation of the Alaska RRT to discuss funding issues that have arisen during our response to the Thermo Fluids fire that occurred on Monday, March 15th in Fairbanks, AK. The purpose of this Incident Specific RRT activation is to make the RRT aware of the funding issue and address the possibility that ARRT will need to inform the NRT of this issue, if necessary.

A conference call line has been set up for 10 - 11:30 am Alaska time today and the call in number is 907-555-2174.

While the entire ARRT is welcome to join in on the conference call, the specific agencies being requested for this activation are:

USEPA
US Coast Guard, District 17
Dept of Interior
Dept of Commerce (NOAA)
State of Alaska

Also, due to the USEPA/USCG jurisdictional boundary on the Yukon River, we would like to request that Associate RRT Member Sector Anchorage also be included in the activation (see below for further discussion).

Background:

After ADEC's request for assistance, EPA began its response to the fire and resulting oil release into the Tanana River, a tributary to the Yukon River, on Monday afternoon, March 15th. The fire broke out earlier in the day. Although the responsible party is conducting much of the response work, EPA is directing the response as required by the NCP. The Oil Spill Liability Trust Fund (OSTLF) was opened to initiate EPA's response. A PRFA (Pollution Removal Funding Authorization) was also issued by the FOSC to US Fish and Wildlife Service for assistance in protecting fish and wildlife species and habitat in the area.

Shortly into the response, the presence of hazardous substances (acid and asbestos) was also identified and EPA has initiated a concurrent CERCLA assessment, with CERCLA funding, to evaluate the potential threat caused by these hazardous substances. The majority of the response efforts has been and continues to be focused on protection of Johnson Creek and the Willamette River from the impacts of the released petroleum products.

Although this is a waste oil facility, analytical results do not indicate significant amounts of any CERCLA hazardous substances in the oil.

Below is the email from the NPFC, documenting the freezing of oil spill funds, for this response.

EPA has set up a web site for the Thermo Fluids response. The web site also includes the POLREPS that have been developed to date. Please do not release this web site to the public at this time.

http://www.epaosc.org/site_profile.asp?site_id=999

Issue:

The National Pollution Funds Center (NPFC), managed by the USCG, has capped the funding allowed for this response at the initial request of \$46,000. With this amount of funding, EPA estimates that we will have to demobilize from the site beginning at approximately 12 noon today, Friday, March 19th. Due to the petroleum exclusion in CERCLA, EPA does not believe we have the statutory authority to continue the response without OSTLF/NPFC funding. The FOSCs on-scene estimate that EPA needs to remain in its oversight role for approximately an additional 5 days until the threat to Tanana River has been abated. ADEC is very concerned that if EPA leaves the site, the responsible party will not fulfill its responsibility to abate the impacts of the discharge of oil into the environment.

If the NPFC does not reverse its decision to cut off funding by 12 noon today, EPA would like ARRT to elevate this issue to the National Response Team.

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Ancillary Issue:

The USEPA/USCG jurisdictional boundary on the Yukon River is the 1000 ft. upstream of the confluence of The Yukon River with the Bering Sea. In the geographic boundaries section of Chapter 1000 of the NWACP it states:

"According to Section 300.140(b) of the NCP, if a discharge or release affects more than one zone, determination of the FOSC shall be based on the area vulnerable to the greatest threat. If the area vulnerable to the greatest threat cannot be determined, the Unified Command shall establish an Incident Command System that adequately accounts for effective response in both zones. If transition of FOSC from one agency to another is necessary, the transition shall follow the guidelines outlined in Section 1410 of this plan."

EPA wants to confirm that USCG Sector Anchorage is aware of the response and supportive of EPA's role as the FOSC.

(for all cases that involve dispersant decisions add the following text from the National Contingency Plan for clarification: 40CFR300.915(b) For spill situations that are not addressed by the preauthorization plans developed pursuant to paragraph (a) of this section, the OSC, with the concurrence of the EPA representative to the RRT and, as appropriate, the concurrence of the RRT representatives from the states with jurisdiction over the navigable waters threatened by the release or discharge, and in consultation with the DOC and DOI natural resource trustees, when practicable, may authorize the use of dispersants, surface washing agents, surface collecting agents, bioremediation agents, or miscellaneous oil spill control agents on the oil discharge, provided that the products are listed on the NCP Product Schedule.)

(for all cases that involve in-situ burning decisions add the following text from the National Contingency Plan for clarification: 40CFR300.915 (c) The OSC, with the concurrence of the EPA representative to the RRT and, as appropriate, the concurrence of the RRT representatives from the states with jurisdiction over the navigable waters threatened by the release or discharge, and in consultation with the DOC and DOI natural resource trustees, when practicable, may authorize the use of burning agents on a case-by-case basis.)