Chapter 2000

Command

Northwest Area Committee Expectations:

- Signatories agree that Unified Command will be utilized to manage spill responses. If consensus cannot be reached, the Federal On-Scene Coordinator has the ultimate decision-making authority.

Critical Elements of Chapter 2000:

- Identifies which agencies have a command role in which situations
- Tribal and local On-Scene Coordinators to be involved in Unified Command when possible.
- Northwest Area Committee prefers spiller not fill the Public Information Officer or Liaison Officer position

Table of Contents

Section **Page**

2000 Command 2000-1

2100 Command Structure – Unified Command Organization 2000-1
2200 Command Staff Elements: Roles and Responsibilities 2000-1
2210 Incident Commander/Unified Command 2000-2
2211 Naming Convention for Oil Spills – Washington State Policy 2000-4
2212 Non-floating Oils – Expectations and Unified Command Responsibilities 2000-4
2220 Information Officer 2000-4
2221 Pre-Joint Information Center – Initial Information Officer 2000-4
2222 Joint Information Center Function and Use of Dispersants 2000-5
2223 Joint Information Center Use of Social Media and Website 2000-5
2230 Safety Officer 2000-6
2231 Safety Officer Function and Use of Dispersants 2000-6
2232 Safety Officer Function and Non-floating Oils 2000-7
2233 Safety Officer Function and Flammable Materials/Volatile Oils 2000-7
2234 Safety Officer Function and Crude Oil 2000-8
2235 Safety Officer Sampling and Monitoring Requirements 2000-8
2240 Liaison Officer 2000-9
2241 Liaison Function and Use of Dispersants 2000-9
2250 Natural Resource Damage Assessment 2000-9
2260 Incident Investigation 2000-10

2000

Command

2100 Command Structure – Unified Command Organization

Policy Statement

It is the policy of the Northwest Area Committee (NWAC) to manage spill incidents according to the following principles:

Incident Command System. The signatory agencies will use the National Incident Management System (NIMS) model Incident Command System (ICS).

Unified Command. When a federal or state agency arrives on scene to participate in managing a response action, the agencies will use a Unified Command (UC) structure to jointly manage the spill incident. In the UC, decisions with regard to the response will be made by consensus and documented through a single Incident Action Plan for each operational period. In the event that the UC is unable to reach consensus, the Federal On-Scene Coordinator (FOSC) has ultimate decision making authority.

Tribal or Local Government On-Scene Coordinators. The UC may incorporate additional tribal or local government On-Scene Coordinators (OSCs) into the command structure as appropriate.

2200 Command Staff Elements: Roles and Responsibilities

The NWAC has adopted the NIMS/ICS as the basic model for managing a coordinated response. Under the UC structure, the federal government, state, and responsible party (RP) will each provide an OSC, who will consult each other and share decision-making authority regarding spill response and cleanup management issues. Depending on the circumstances of the incident, a local or tribal entity may also provide an OSC. Together, these OSCs will jointly serve as the UC.

2210 Incident Commander/Unified Command

Incident Commanders for oil discharges and hazardous substance releases will, whenever possible and practical, be organized under the UC structure, which includes, but is not limited to:

- The pre-designated FOSC,
- The State On-Scene Coordinator (SOSC),
- The representative of the RP, and
- The local and/or Tribal On-Scene Coordinators (TOSCs), as appropriate.

To be considered for inclusion as a UC member, the following criteria must be considered:

1. The organization must have jurisdictional authority or functional responsibility under a law or ordinance for the incident; and
2. The organization must be specifically charged by law or ordinance with commanding, coordinating or managing a major aspect of the incident response; and
3. The incident or response operations must have impact on the organization's Area of Responsibility; and
4. The organization should have the resources to support participation in the response organization.

Actual UC makeup for a specific incident will be determined on a case-by-case basis, taking into account:

- The specifics of the incident,
- Determinations outlined in the four criteria listed above, and
- Decisions reached during the initial meeting of the UC.

The makeup of the UC may change as the incident progresses, in order to account for changes in the situation.

The UC is responsible for the overall management of the incident. The UC directs incident activities, including the development and implementation of strategic decisions, approval of the Incident Action Plan, and approves the ordering and releasing of resources. It is expected that each UC member will have the authority to make decisions and commit resources on behalf of his or her organization.

An organizational chart for the UC and command staff is shown in Figure 2000-1. This chart serves as an example and is not meant to be all-inclusive.

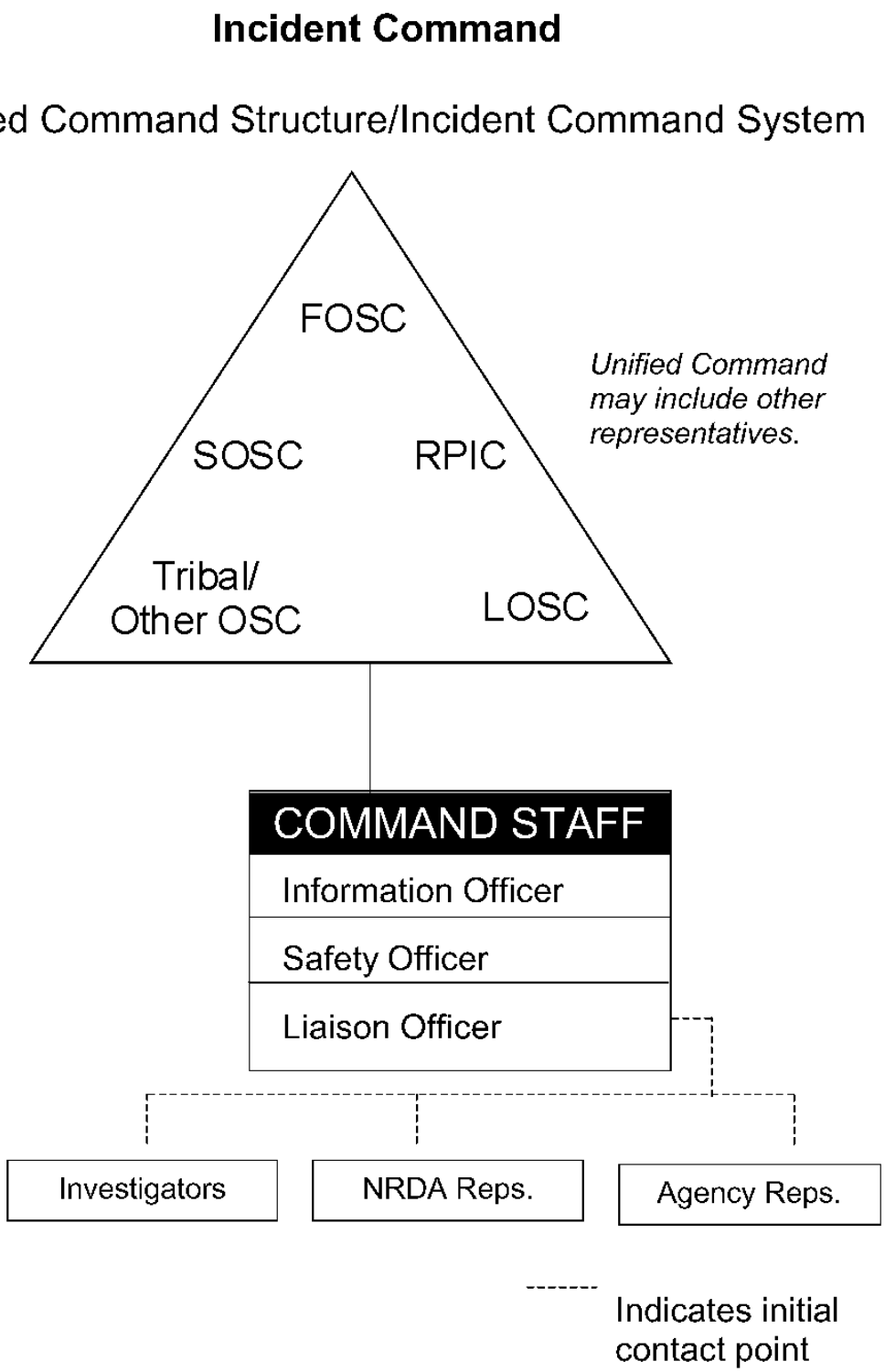

Figure 2000-1 Incident Command

2211 Naming Convention for Oil Spills – Washington State Policy

To ensure that accurate and credible information is provided to the public and to elected officials, it is the policy in Washington State to use the following naming convention for oil spills:

1. **Source by Name**: Name of vessel or facility, or other source (rail, pipeline, etc.)
2. **Geographic:** Location of the incident
3. **Incident Description**: Spill, spill threat, fire, explosion, grounding, sinking, etc.
4. **Date**: May be optional if the spiller has had previous oil spills.

When UC is formed, UC officials negotiate and concur on key decisions, which may include the name of the incident.

2212 Non-floating Oils – Expectations and Unified Command Responsibilities

The expectation of the Co-chairs of the NWAC and committee members is that non-floating oil will be identified in the initial report of an oil spill to the National Response Center. With knowledge that oil spilled is a non-floating oil, professional oil spill responders will identify specialized submerged oil equipment and personnel and bring it to the scene. Unified Commanders must concern themselves with writing response objectives aimed at underwater detection, containment, and recovery. See Section 9412, "Non-floating Oil Spill Response Tool," for details on response techniques, equipment capabilities, and considerations for non-floating oil spill response. See Section 2232 for safety concerns specific to non-floating oils.

2220 Information Officer

The Regional Response Team (RRT)/NWAC prefers that the spiller not fill the Information Officer position. This applies to both government agency and private industry spillers. However, the RRT/NWAC recognizes that UC holds the discretion to fill the position with whomever they choose. UC should consider credibility with the media and public, as well as previous experience in drills or spills, familiarity with the Northwest Area Contingency Plan tools and policies and with Emergency Management Support Function #15. Upon concurrence of UC, the spiller may fill the Information Officer position. The RRT/NWAC also encourages responsible parties to designate an Assistant Information Officer, who will participate in all the meetings attended by and briefings made by the Information Officer.

See Section 9202, "Joint Information Center Manual."

2221 Pre-Joint Information Center – Initial Information Officer

When a state environmental or emergency management agency, the United States Coast Guard, or the United States Environmental Protection Agency (EPA) first

learns about a spill, the respective Public Information Officers (PIOs) should quickly contact one another to share information in an effort to release a joint statement to the media. This first release should be issued within 30 minutes of the initial notification and not longer than two hours after notification is received. Initial media releases should be approved by the FOSC or his/her designated representative and the SOSC prior to release.

Until a Joint Information Center (JIC) is established, communication with the media and other key audiences is carried out by a lead agency's information office, either remotely or on site.

To build trust with the public and among agencies that are responding to the incident, every press release should include a "cooperative response statement." This statement should include, by name, all the primary participating agencies who are responding to the spill.

The volume of material spilled is an important piece of information that the public and media are generally interested in during the early hours of an incident. Unless responding agencies have accurate information regarding the volume spilled that has been approved through the UC for release, initial press releases should use a range of volumes, state the potential spill volume, or emphasize that the volume is only an estimate that may change as more accurate information is obtained.

2222 Joint Information Center Function and Use of Dispersants

Once UC sets objectives to consider the use of dispersants, it is critical that the JIC prepare for communication with the public.

The Information Officer will review any Environmental Unit (EU) Dispersant Recommendation Memo prior to its submission to the UC for consideration, and will work with the Environmental Unit Leader (EUL) to ensure that the memo meets the needs of the Information Officer.

If the UC decides to proceed with the use of dispersants during an incident response, the JIC should be prepared to provide a mechanism for sharing information with the public and addressing potential concerns. The JIC should also be ready to outline the process used to make the decision, provide background and scientific information about dispersants and the area in which they will be used, and address any other environmental and safety considerations expressed by the public.

2223 Joint Information Center Use of Social Media and Website

At the formation of a JIC, the Information Officer will provide recommendations to establish an incident specific website and use of social media accounts. The Information Officer should advise Unified Command on options for hosting the incident specific website, including agency supported site or purchase of site

hosting platform. Additional guidance and best practices are found in Chapter 9202.7.6.

2230 Safety Officer

Personnel involved in oil spill response activities must comply with all applicable worker health and safety laws and regulations. The UC may appoint a Safety Officer and request development of a specific Site Safety Plan. Site Safety Plan Job Aid is described in Section 9203, "Health and Safety Job Aid." Key safety aspects to be considered in the plan may include:

- Physical hazards (e.g., waves, tides, unstable or slippery surfaces);
- Heavy machinery and equipment;
- Chemical hazards (e.g., oil and dispersant exposure);
- Atmospheric hazards (e.g., fumes, ignition risks);
- Confined spaces;
- Personal protective equipment;
- Noise;
- Fatigue;
- Heat/cold stress;
- Wildlife (bites/stings);
- Cleanup facilities;
- Medical treatment; and
- Extreme weather.

The Hazard Assessment Worksheet as provided in Section 9701 or equivalent should be completed before personnel enter a hazardous location or site for the first time. When complete the worksheet is attached to the SDS/Chemical Database Print-out/Bill of Lading and submitted to the Documentation Unit.

2231 Safety Officer Function and Use of Dispersants

The Safety Officer will review the EU Dispersant Recommendation Memo prior to its submission to the UC for consideration and will work with the EUL to ensure that the memo meets the needs of the Safety Officer.
Additional safety considerations when using dispersants include:

- Individuals should not engage in activities that they are not appropriately trained to perform.
- Individuals are expected to adhere to safety procedures appropriate to the conditions under which they are working.
- Vessel/aircraft operators are expected to define appropriate operational limits and safety and maintenance requirements for their craft.
- Vessels and response resources should be properly maintained and undergo proper decontamination procedures.

- Apply dispersants only if there is no significant risk to response personnel (e.g., ignition risk, operational hazards).
- Ensure that appropriate personal protective equipment is used.
- Ensure that application aircraft and vessels remain within standard operating limits.

2232 Safety Officer Function and Non-floating Oils

When diving operations are conducted in contaminated water or in an area where there is a substantial threat of discharge of oil or hazardous materials, commercial divers must also comply with the Occupational Safety and Health Administration training and operational standards for Hazardous Waste Operations and Emergency Response (HAZWOPER). Divers should provide proof of HAZWOPER training, proof that they participate in a medical monitoring program with their employers, and evidence that they have completed the annual refresher training, before commencing diving operations. The Safety Officer should supplement his or her site-specific safety plan and on-site safety audits with a safety checklist for contaminated water diving if divers are used to locate non-floating oils. See Section 9412, "Non-floating Oils Response Tool" for details on response techniques, equipment capabilities, and considerations for non-floating oil spill response. The American Petroleum Institute (API) Technical Reports in Attachment C of the 9412 tool contain additional information on diving operations and safety considerations for non-floating oil response:

- API Technical Report 1154-1, Section 6: Diving in Oil Contaminated Water[1]
- API Operational Guide, Report 1154-2, Section 7: Safety Considerations[2]

2233 Safety Officer Function and Flammable Materials/Volatile Oils

Because of high concentrations of light hydrocarbons in volatile oils, the potential for fire and explosion is the single largest risk to responders and public health. Examples of such products includes, but is not limited to, gasoline, condensate and Bakken crude. Extreme caution should be exercised especially during the initial stages of response. Section 3320.1, "Tactical Response Options, Gasoline and Other Flammable Liquids" and Section 4622 "Gasoline and Other Flammable Liquids Response Policy" provide guidance on the response challenges and strategies with gasoline and other products with light ends. Operations should also refer to general response guidelines in the 2012 Emergency Response Guidebook prepared by the United States Department of Transportation – Pipeline and Hazardous Materials Safety Administration and Transport Canada. Bakken is not listed by name, but falls under Petroleum Crude Oil.

[1] American Petroleum Institute, February 2016, *Sunken Oil Detection and Recovery, API Technical Report 1154-1*, First Edition, API Publishing Services, Washington, DC.

[2] American Petroleum Institute, February 2016, *Sunken Oil Detection and Recovery Operational Guide, API Technical Report 1154-2*, First Edition, API Publishing Services, Washington, DC.

2234 Safety Officer Function and Crude Oil

During the initial days of spill response, the major components of concern to human health in crude oils include the volatile compounds— benzene, toluene, ethylbenzene, and xylenes (collectively called BTEX) and hydrogen sulfide (H_2S)—that can result in acute and sublethal effects via inhalation exposure. Extreme caution should be exercised especially during the initial stages of response.

2235 Safety Officer Sampling and Monitoring Requirements

On hazardous waste sites it is required to conduct monitoring for health and safety hazards to protect employees and workers. This includes:

1) Evaluate the need for medical monitoring of response personnel
2) Help determine if samples need to be shipped as dangerous goods
3) Monitoring for health and safety hazards during initial site entry
    a) Make visual observations of the site to detect signs of actual or potential chemical, physical, and biological hazards immediately dangerous to life and health (IDLH) or other dangerous conditions
    b) Conduct representative air monitoring with direct reading test equipment, when the preliminary site evaluation does not eliminate the potential for ionizing radiation or IDLH conditions
    c) Assess the following:
        i) Potential IDLH conditions
        ii) Exposure over radioactive material dose limits
        iii) Potential exposure over permissible exposure limits (PEL's) or other published exposure levels
        iv) Other dangerous conditions such as the presence of flammable or oxygen-deficient atmospheres
        v) Physical hazards
4) Evaluating employee exposure to hazardous substances during clean-up operations
    a) Identify the type of personnel monitoring and environmental sampling you plan to use, including instrumentation
    b) Include requirements for maintaining and calibrating the monitoring and sampling instrumentation used
    c) Monitor whenever employees may be exposed to concentrations exceeding PEL's or other published exposure levels
    d) Evaluate employees who are likely to have the highest exposure:
        i) Monitor all employees who are likely to have the highest exposure to hazardous substances or health hazards above the PEL
        ii) Use personal sampling frequently enough to characterize the exposures of these employees
        iii) When results indicate exposure over PEL, identify all employees likely to have been exposed to levels above that PEL
5) Conduct monitoring when the possibility of one of the following exists:
    a) An atmosphere that is immediately dangerous to life and health; OR
    b) A flammable atmosphere; OR

c) Employee exposures above PEL.

HUMAN SAFETY OVERRIDES ALL OTHER CONSIDERATIONS DURING A RESPONSE

2240 Liaison Officer

Given the importance of the Liaison Officer (LNO) duties, and to ensure public confidence and trust, it is the policy of the RRT/NWAC for the LNO position to be filled by a qualified representative of a federal, state, tribal, or local agency, if available. If no such agency representative is initially available, qualified, or willing to be the LNO, an RP representative may, upon the UC's concurrence, fill that role. Furthermore, a transition to an RP designated LNO may occur with the concurrence of the UC. The RRT/NWAC also encourages responsible parties to designate an Assistant LNO to participate in the meetings attended by the LNO.

See Section 9210, "Liaison Manual."

2241 Liaison Function and Use of Dispersants

Once UC sets objectives to consider the use of dispersants, it is critical that Liaison prepares for communication with stakeholders, including elected officials. Stakeholder meetings should be scheduled as soon as possible to provide a mechanism for sharing information and addressing concerns. Liaison should be ready to provide first initial, and then reliable and continuous, updates to stakeholders once the decision to use dispersants is made.

Areas that must be adequately addressed during a response for stakeholders include:

- Background and scientific information;
- Decision process and area plan policies for dispersant use;
- Seafood tainting concerns posed by dispersants;
- Risk communication;
- Discussion of net environmental benefit analyses and species of special concern; and
- Monitoring policies established for the spill.

The LNO will review the EU Dispersant Recommendation Memo prior to its submission to the UC for consideration and will work with the EUL to ensure that the memo meets the needs of the LNO.

2250 Natural Resource Damage Assessment

Natural Resource Damage Assessment (NRDA) involves identifying the type and degree of impacts on public biological and cultural resources in order to assist in restoring those resources. NRDA may involve a range of field surveys and studies used to develop a monetary damage claim, or may involve immediately developing a restoration plan with the RP. NRDA activities for small spills

typically involve simplified assessment methods and minimal field data collection.

Given that the goals of NRDA are outside the sphere of most emergency spill response actions, 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 NRDA and response activities simultaneously. Therefore, NRDA staff should remain coordinated with the spill response organization and need to work with the LNO to coordinate with the UC, EU, Wildlife Branch and the National Oceanic and Atmospheric Administration Scientific Support Coordinator to resolve any problems or address areas of overlap. While NRDA resource requirements and costs may fall outside the responsibility of the Logistics and Finance sections, coordination is again important.

2260 Incident Investigation

Criminal or civil investigators from federal and state agencies will not normally be a part of the UC. While personnel may report to individuals that are part of the UC, the investigators should be separate so as not to introduce polarizing forces into the UC system. Coordination with UC is done through the LNO.