

EPA III NOTIFICATION TO DOI AS A TRUSTEE
Oil and Hazardous Substance Incidents

Issue: How do we develop a simple and bureaucratically painless process for EPA III OCSS to provide trustee notifications to DOI?

Justification: NCP Subsection 300.135(j)(1) requires that the OSC/RPM ensure that the trustees for natural resources are promptly notified of discharges and releases.

Challenge: Agree upon an acceptable set of notification pathways whereby DOI receives routine **and reasonable** notifications. The pathway would be linked to the type and magnitude of incident. THIS IS NOT RRT OR AREA COMMITTEE NOTIFICATION TO SOLICIT DOI ASSISTANCE IN RESPONSE! THOSE NOTIFICATIONS ARE GOVERNED BY THE RCP AND ACP PROTOCOLS DEVELOPED FOR THOSE PLANS.

Decision: Implement the following protocols for a period of one year or until a re-assessment of the situation dictates a change.

A. Oil Discharges outside containment

Actual/high probability \geq 1,000 gallons

Actual < 1,000 gal.

Telephone within 1 hour
M-F, 7:30-4:30 (215) 597-5378

Fax within 24 hours *sometimes*
All faxes (215) 597-9845 *=problem*
Temp - 597-5012 11/9/95

After hours:
Primary: D^r Henne (609) 728-2603
Alternate: M^r Chezik (609) 435-1468

10/4/94

B. Hazardous Substance Releases outside containment, To land/water

Actual/high probability \geq 500 lbs/gal

Actual < 500 lbs/gallons

Telephone within 1 hour
M-F, 7:30-4:30 (215) 597-5378

Fax within 24 hours
All faxes (215) 597-9845

After hours:
Primary: D. Henne (609) 728-2603
Alternate: M. Chezik (609) 435-1468

Professional judgement: It is assumed that if the OSC is aware of impacts or significant threats to migratory birds, species protected by the Endangered Species Act, or facilities managed by DOI, that prompt notification via telephone would occur **regardless** of the general quantity guidelines.

10/4/94