

COMPREHENSIVE OIL SPILL RESPONSE PLANNING: GOING BEYOND “WHAT” YOUR GOING TO DO

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ABSTRACT: *A review of the law and responsibilities for oil spill response reveals a need for taking oil spill response incident management planning beyond just describing what will be done, to a new level that describes specifically who will do it. Facilitating the development of an effective management team in the first 24-48 hours of a spill is critical to setting the response operations in a positive motion, and ultimate success. The development of a draft Incident Command System (ICS) structure to meet the expectations of a Type II incident and pre-identification of personnel for specific assignments will enable a more cohesive personnel qualification process, training and exercises focused on general incident management, and ultimately a better prepared cadre of response personnel. The vision for Coast Guard District Thirteen is a District Response Group that is organized into a defined and pre-approved ICS structure, with these expectations set. The National Oil and Hazardous Substances Pollution Contingency Plan requires the Coast Guard to form District Response Groups. By definition, this is all personnel and every asset the Coast Guard has within each District. However, this does not speak to the qualifications of these personnel, or address the tasking some units may receive, both of which are known. In the early hours of a major spill, confusion reigns and calls for help are made. This can be a call for help that is specific, such as the number of beach monitors, OPS Section Chiefs, or Check-in Recorders that are needed, or the more likely request is to send whoever is available. The latter is not likely to enable success if well intentioned but inexperienced management personnel show up. If we know who is available within the Coast Guard district, then we know our strengths. Therefore, we also know our weaknesses, and can identify gaps. By identifying our ICS structure, we can examine our resources, needs, and expectations; and have a plan that works while remaining flexible. There is no need to assemble a management team on the fly in the first 24 hours of a spill.*

Discussion

The law. The District Response Group is mandated by the Oil Pollution Act of 1990 and is included in the National Contingency Plan. Within the National Contingency Plan, it is defined as:

Coast Guard District Response Group as provided for by Clean Water Act sections 311(a)(20) and (j)(3), means the entity

established by the Secretary of the department in which the Coast Guard is operating, within each Coast Guard (U.S.C.G.) district, and shall consist of: the combined U.S.C.G. personnel and equipment, including marine firefighting equipment, of each port in the district; additional pre-positioned response equipment; and a District Response Advisory Team.

Each District Response Group:

- a. Shall provide technical assistance, equipment, and other resources, as available, when requested by an OSC through the U.S.C.G. representative to the Regional Response Team;
- b. Shall ensure maintenance of all U.S.C.G. response equipment within its district;
- c. May provide technical assistance in preparation of the Area Contingency Plan; and
- d. Shall review each of those plans that affect its area of geographic responsibility.

The District Response Groups are designated as a Special Team and is specifically tasked with assisting the OSC, and assisting the Area Committee in developing the Area Contingency Plan. The law and regulations clearly state the Coast Guard's responsibilities, and all of this is being accomplished. However, a greater organization of the talents and resources can facilitate an improved response.

The need. The definition of the District Response Group includes the combined U.S.C.G. personnel and equipment within the district. District Thirteen Marine Safety Division realized that for oil spill response, there was little organization of the District Response Group. The pre-positioned equipment and District Response Advisory Team exists, and are well maintained and working diligently, but the entire personnel resources within the district were not organized. With Coast Guard adoption of ICS, a response management tool and structure exists, but many decisions and considerations needed to be made.

The void was in staffing a large oil spill response, such as a Type II spill. A Type II oil spill is defined as one that is regionally significant. An event of this size would require a command post with the potential for over 350 personnel. Originally envisioned for responses lacking a responsible party, this effort is also applicable to events where the Coast Guard initially responds, while establishing whom the Responsible Party is and waiting their arrival on scene. The need for an influx of personnel is overwhelming, and to date has been accomplished on an ad-hoc basis without prior specific planning.

The need for additional personnel can't be satisfied by a simple call to other Coast Guard units for help. Within ICS, these personnel need to come with the experience and background to perform the tasks they will be assigned. Calling a Coast Guard Marine Safety Office and requesting ten personnel will only be answered with the question of what ten personnel are needed. The request for specific personnel, or personnel with specific qualifications, for the most part can be fulfilled only by predetermining the need and validating the existence of qualified personnel.

Without a doubt, solving this initial shortfall of personnel must revolve around ICS. ICS is widely accepted and has become the "traditional" method by which to manage oil spill response. Federal, state, and local agencies have accepted it as the primary management tool for many type emergencies, and even Area Contingency Plans for oil spill response are structured according to the principles of ICS. This is the case in the Pacific Northwest with Oregon, Washington, and Idaho using one ICS based plan serving as both the Regional Contingency Plan and Area Contingency Plan. We have ICS, one response plan, and everyone is in agreement. It became clear that it was time to move forward and advance the planning with some specifics.

The process. Successful oil spill response is dependent on qualified personnel and operational equipment. It was decided to limit our efforts to personnel resources. The Coast Guard pre-positioned equipment is in place, well maintained and ready for deployment. All area contractor resources are well known, cataloged and can be found at <http://www.U.S.C.G.mil/d13/m/>.

To start the process of organizing a District Response Group, District Thirteen reviewed where we stood in relation to the law and the definition of a District Response Group. It was clear that a District Response Group is called for within the National Contingency Plan, and that it was not an organized group. The effort to determine an ICS structure and staff it would improve readiness, solve the long-standing problem of staffing a spill in the initial hours, and establish the required District Response Group.

To successfully generate a plan that would effect the entire Coast Guard district and resources controlled by other Coast Guard units, it would be necessary to obtain the support of all those involved. Gaining their support and involvement would be critical. The Captain of the Port Portland and Puget Sound are ultimately responsible for all coastal oil spill response in Oregon, Washington and Idaho, within their respective Area of Responsibility. Therefore, the initial ICS structure would be determined by them, and then grow and change as the response stabilized and the unified command was activated. Educating them on the proposed effort and gaining the commitment of their staff's time and resources was accomplished.

Marine Safety Office Portland was selected as a starting point. They had developed a draft ICS organization, refined it and had the Captain of the Port's approval. This organization was not meant to be restrictive or set in stone. This is a starting point intended to allow for mobilization of key personnel and to satisfy an intense need. Every response is unique and this organization was designed to cover the common ground.

With the ICS structure in hand, a format (spreadsheet) was developed to capture the data. Table 1 illustrates the Excel sheet for the Command Section for a Type 2 oil spill in Portland, Oregon. A sheet for each ICS section was developed. With the ICS positions listed on the left side, each Coast Guard unit within

the district that would be expected to provide assistance was listed across the top. It also includes the states and some Coast Guard personnel outside the district. A draft effort was first completed by district staff personnel. The number of people needed from each unit is listed, and each is assigned a time frame in which they would be expected to respond, indicated by A, B or C. The required personnel are totaled up for quick reference. Of note is that the effort assumes shift work for some, but not all sections and also recognizes the importance of getting key personnel into place within four hours of notification. A gap exists if the personnel don't exist (e.g. there is a billet identified at a unit but a person is not filling the billet), the personnel exist but aren't trained, and if the personnel cannot meet the requirements for time availability.

With a proposed ICS organization and a format for gathering the data, a group of experienced responders was then gathered to review the ICS organization. This group included the Section Chiefs and other lead personnel within the proposed ICS organization. They reviewed the organization with the goal to expand it and determine how their respective sections would be developed and what personnel they would need. As an example, the district Information Division developed the Joint Information Center organization, within the Command Section. These are the personnel responsible for its operation and they significantly expanded their branch.

After the proposed organization was expanded, it was resubmitted to Marine Safety Office Portland and the Captain of the Port for review. After approval, the intense personnel requirements that extended district wide were recognized. It required that all the assisting units be notified of the personnel requirements in the event of a Type II oil spill. The goal is to identify any inability to meet this need and set the expectation.

The results. With the spreadsheet in hand, expectations set, and a determined path, spill preparedness in the Coast Guard Thirteenth District has advanced as a result of these efforts. It should be noted that the Federal On-Scene Coordinator is not committed to the staffing outlined in the tool. However, in the midst of crisis, the tool potentially reduces the amount of work that would go into building an incident management team by enabling the FOSC to select all or part of the pre-determined structure and staff. The district, as a resource provider, now has the ability to provide a service, with an endorsed ICS structure and a plan to provide the assistance.

Conclusions

In the initial stages of spill response the need for qualified personnel is overwhelming. Deciding on the structure of your basic organization and looking for personnel make the situation even more chaotic. Regardless of this intense demand for resources, the Captain of the Port must launch a maximum and immediate response. Response requires planning and a close evaluation of where we stand in relation to the demands that we have experienced in previous spills. The off-the-cuff development of a large spill management structure of this magnitude is not necessary or recommended. As an organization with training, planning and response resources in place, the preplanning and structuring of these resources is easily accomplished and brings spill response preparedness to a new level.

Table 1. MSO Portland and District Response Group, type 2 oil spill response organization incident command structure.

	MSO / GRU Portland		D13 / IMAT		MSO Puget Sound		PST / NSF		DEQ / DOE	
Incident Command (MSO)										
Incident Commander / FOSC	A	1							A	1
Deputy IC	A	1								
Total IC Per Unit		2		0		0		0		1
Total Incident Command	3									
Info Officer	A	1	B	1						
Asst IO / JIC Manager							C	1		
Asst IO / Internal Affairs									B	1
Data Gathering Asst			B	1						
Product Asst										
Photo Asst			B	1						
Support	C	1								
Asst IO / External Affair							C	1		
Escort			B	1						
Community liaison									B	1
Dissemination Asst	B	1	B	1						
Total Information per Unit		3		5		0		2		2
Total Information	12									
Safety Officer	A	1	A	1						
Assistant Safety Officer					B	1				
Field Safety Supervisors							B	3		
Field Safety Supervisors										
Field Safety Supervisors										
Total Safety Per Unit		1		1		1		3		0
Total Safety	6									
Liaison Officer	A	1	B	1						
Agency Rep									B	1
Agency Rep										
Agency Rep										
Total Liaison Per Unit		1		1		0		0		1
Total Liaison	3									
Legal Officer			A	1						
Assistant										
Total Legal Per Unit		0		1		0		0		0
Total Legal	1									
CISM tech specialist			A	1						
Asst CISM tech spec										
Team coordinators										
Admin asst										
Team members										
Total CISM Per Unit		0		1		0		0		0
Total CISM	1									
Total Per Unit		7		9		1		5		4
Total Command Personnel	26									
Response Times Defined:										
A = 4 hours										
B = 12 hours										
C = 24 hours										

Biography

CDR Bill Whitson has served in the Coast Guard for 20 years. His current assignment is Chief of the Marine Response Branch, Thirteenth Coast Guard District, Seattle, Washington. He holds a B.S. in Marine Transportation from the U.S. Merchant Marine Academy.

References

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2. U. S. Code (USC). 1990. *Oil Pollution Act of 1990*. 33 USC 40. Subchapter I. Sections 2701-2761.