

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

1	Section	Page
2		
3	2000 Command	2000-1
4	2100 Command Structure – Unified Command Organization	2000-1
5	2200 Command Staff Elements: Roles and Responsibilities.....	2000-1
6	2210 Incident Commander/Unified Command.....	2000-2
7	2211 Naming Convention for Oil Spills – Washington	
8	State Policy	2000-4
9	2212 Non-floating Oils – Expectations and Unified	
10	Command Responsibilities	2000-4
11	2220 Information Officer	2000-4
12	2221 Pre-Joint Information Center – Initial Information	
13	Officer	2000-5
14	2222 Joint Information Center Function and Use of	
15	Dispersants	2000-5
16	2223 Joint Information Center Use of Social Media and	
17	Website	2000-5
18	2230 Safety Officer	2000-6
19	2231 Safety Officer Function and Use of Dispersants.....	2000-6
20	2232 Safety Officer Function and Non-floating Oils	2000-7
21	2233 Safety Officer Function and Flammable	
22	Materials/Volatile Oils.....	2000-7
23	2234 Safety Officer Function and Crude Oil	2000-8
24	2235 Safety Officer Sampling and Monitoring	
25	Requirements	2000-8
26	2240 Liaison Officer	2000-9
27	2241 Liaison Function and Use of Dispersants	2000-9
28	2250 Natural Resource Damage Assessment	2000-9
29	2260 Incident Investigation.....	2000-10
30		

2

0

0

0

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34

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.

- 1 **2210 Incident Commander/Unified Command**
2 Incident Commanders for oil discharges and hazardous substance releases will,
3 whenever possible and practical, be organized under the UC structure, which
4 includes, but is not limited to:
- 5 ▪ The pre-designated FOSC,
 - 6 ▪ The State On-Scene Coordinator (SOSC),
 - 7 ▪ The representative of the RP, and
 - 8 ▪ The local and/or Tribal On-Scene Coordinators (TOSCs), as appropriate.
- 9
10 To be considered for inclusion as a UC member, the following criteria must be
11 considered:
- 12 1. The organization must have jurisdictional authority or functional
13 responsibility under a law or ordinance for the incident; and
 - 14 2. The organization must be specifically charged by law or ordinance with
15 commanding, coordinating or managing a major aspect of the incident
16 response; and
 - 17 3. The incident or response operations must have impact on the
18 organization’s Area of Responsibility; and
 - 19 4. The organization should have the resources to support participation in the
20 response organization.
- 21
22 Actual UC makeup for a specific incident will be determined on a case-by-case
23 basis, taking into account:
- 24 ▪ The specifics of the incident,
 - 25 ▪ Determinations outlined in the four criteria listed above, and
 - 26 ▪ Decisions reached during the initial meeting of the UC.
- 27
28 The makeup of the UC may change as the incident progresses, in order to account
29 for changes in the situation.
30
- 31 The UC is responsible for the overall management of the incident. The UC directs
32 incident activities, including the development and implementation of strategic
33 decisions, approval of the Incident Action Plan, and approves the ordering and
34 releasing of resources. It is expected that each UC member will have the authority
35 to make decisions and commit resources on behalf of his or her organization.
36
- 37 An organizational chart for the UC and command staff is shown in Figure 2000-1.
38 This chart serves as an example and is not meant to be all-inclusive.

Incident Command

Unified Command Structure/Incident Command System

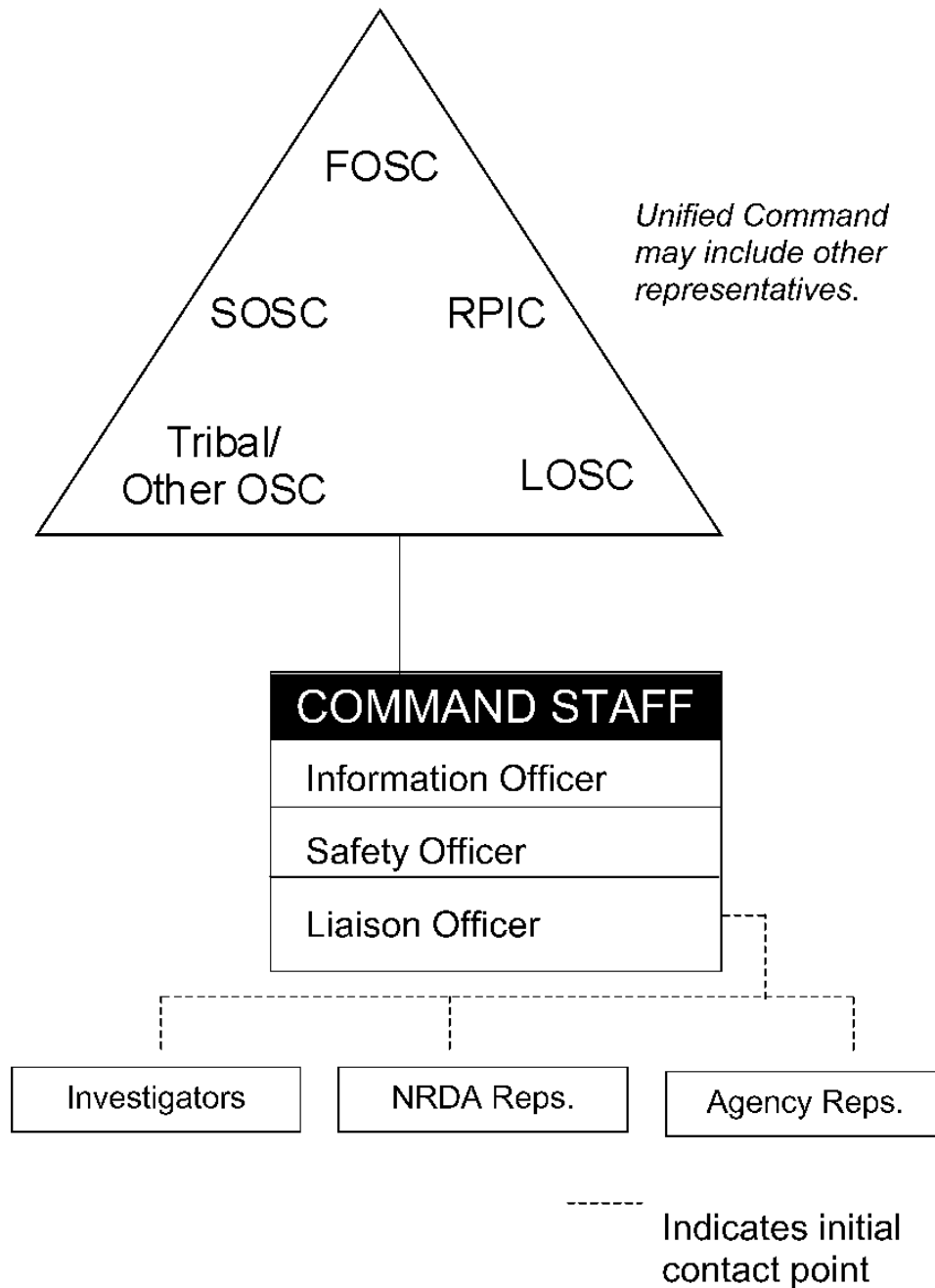


Figure 2000-1 Incident Command

- 1
2 **2211 Naming Convention for Oil Spills – Washington State Policy**
3 To ensure that accurate and credible information is provided to the public and to
4 elected officials, it is the policy in Washington State to use the following naming
5 convention for oil spills:
6 **1. Source by Name:** Name of vessel or facility, or other source (rail,
7 pipeline, etc.)
8 **2. Geographic:** Location of the incident
9 **3. Incident Description:** Spill, spill threat, fire, explosion, grounding,
10 sinking, etc.
11 **4. Date:** May be optional if the spiller has had previous oil spills.

12
13 When UC is formed, UC officials negotiate and concur on key decisions, which
14 may include the name of the incident.
15

16 **2212 Non-floating Oils – Expectations and Unified Command**
17 **Responsibilities**

18 The expectation of the Co-chairs of the NWAC and committee members is that
19 non-floating oil will be identified in the initial report of an oil spill to the National
20 Response Center. With knowledge that oil spilled is a non-floating oil,
21 professional oil spill responders will identify specialized submerged oil
22 equipment and personnel and bring it to the scene. Unified Commanders must
23 concern themselves with writing response objectives aimed at underwater
24 detection, containment, and recovery. See Section 9412, “Non-floating Oil Spill
25 Response Tool,” for details on response techniques, equipment capabilities, and
26 considerations for non-floating oil spill response. See Section 2232 for safety
27 concerns specific to non-floating oils.
28

29 **2220 Information Officer**

30 The Regional Response Team (RRT)/NWAC prefers that the spiller not fill the
31 Information Officer position. This applies to both government agency and private
32 industry spillers. However, the RRT/NWAC recognizes that UC holds the
33 discretion to fill the position with whomever they choose. UC should consider
34 credibility with the media and public, as well as previous experience in drills or
35 spills, familiarity with the Northwest Area Contingency Plan tools and policies
36 and with Emergency Management Support Function #15. Upon concurrence of
37 UC, the spiller may fill the Information Officer position. The RRT/NWAC also
38 encourages responsible parties to designate an Assistant Information Officer, who
39 will participate in all the meetings attended by and briefings made by the
40 Information Officer.
41

42 [See Section 9202, “Joint Information Center Manual.”](#)
43

- 1 **2221 Pre-Joint Information Center – Initial Information Officer**
2 When a state environmental or emergency management agency, the United States
3 Coast Guard (USCG), or the United States Environmental Protection Agency
4 (EPA) first learns about a spill, the respective Public Information Officers (PIOs)
5 should quickly contact one another to share information in an effort to release a
6 joint statement to the media. This first release should be issued within 30 minutes
7 of the initial notification and not longer than two hours after notification is
8 received. Initial media releases should be approved by the FOSC or his/her
9 designated representative and the SOSOC prior to release.
10
11 Until a Joint Information Center (JIC) is established, communication with the
12 media and other key audiences is carried out by a lead agency’s information
13 office, either remotely or on site.
14
15 To build trust with the public and among agencies that are responding to the
16 incident, every press release should include a “cooperative response statement.”
17 This statement should include, by name, all the primary participating agencies
18 who are responding to the spill.
19
20 The volume of material spilled is an important piece of information that the public
21 and media are generally interested in during the early hours of an incident. Unless
22 responding agencies have accurate information regarding the volume spilled that
23 has been approved through the UC for release, initial press releases should use a
24 range of volumes, state the potential spill volume, or emphasize that the volume is
25 only an estimate that may change as more accurate information is obtained.
26
27 **2222 Joint Information Center Function and Use of Dispersants**
28 Once UC sets objectives to consider the use of dispersants, it is critical that the
29 JIC prepare for communication with the public.
30
31 The Information Officer will review any Environmental Unit (EU) Dispersant
32 Recommendation Memo prior to its submission to the UC for consideration, and
33 will work with the Environmental Unit Leader (EUL) to ensure that the memo
34 meets the needs of the Information Officer.
35
36 If the UC decides to proceed with the use of dispersants during an incident
37 response, the JIC should be prepared to provide a mechanism for sharing
38 information with the public and addressing potential concerns. The JIC should
39 also be ready to outline the process used to make the decision, provide
40 background and scientific information about dispersants and the area in which
41 they will be used, and address any other environmental and safety considerations
42 expressed by the public.
43
44 **2223 Joint Information Center Use of Social Media and Website**
45 At the formation of a JIC, the Information Officer will provide recommendations
46 to establish an incident specific website and use of social media accounts. The

1 Information Officer should advise Unified Command on options for hosting the
2 incident specific website, including agency supported site or purchase of site
3 hosting platform. Additional guidance and best practices are found in Chapter
4 9202.7.6.

5

6 **2230 Safety Officer**

7 Personnel involved in oil spill response activities must comply with all applicable
8 worker health and safety laws and regulations. The UC may appoint a Safety
9 Officer and request development of a specific Site Safety Plan. [Site Safety Plan](#)
10 [Job Aid is described in Section 9203](#), “Health and Safety Job Aid.” Key safety
11 aspects to be considered in the plan may include:

- 12 ■ Physical hazards (e.g., waves, tides, unstable or slippery surfaces);
- 13 ■ Heavy machinery and equipment;
- 14 ■ Chemical hazards (e.g., oil and dispersant exposure);
- 15 ■ Atmospheric hazards (e.g., fumes, ignition risks);
- 16 ■ Confined spaces;
- 17 ■ Personal protective equipment;
- 18 ■ Noise;
- 19 ■ Fatigue;
- 20 ■ Heat/cold stress;
- 21 ■ Wildlife (bites/stings);
- 22 ■ Cleanup facilities;
- 23 ■ Medical treatment; and
- 24 ■ Extreme weather.

25

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

30

31 **2231 Safety Officer Function and Use of Dispersants**

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

35 Additional safety considerations when using dispersants include:

- 36 ■ Individuals should not engage in activities that they are not
37 appropriately trained to perform.
- 38 ■ Individuals are expected to adhere to safety procedures appropriate to
39 the conditions under which they are working.
- 40 ■ Vessel/aircraft operators are expected to define appropriate operational
41 limits and safety and maintenance requirements for their craft.

- 1 ■ Vessels and response resources should be properly maintained and
2 undergo proper decontamination procedures.
- 3 ■ Apply dispersants only if there is no significant risk to response
4 personnel (e.g., ignition risk, operational hazards).
- 5 ■ Ensure that appropriate personal protective equipment is used.
- 6 ■ Ensure that application aircraft and vessels remain within standard
7 operating limits.
- 8

9 **2232 Safety Officer Function and Non-floating Oils**

10 When diving operations are conducted in contaminated water or in an area where
11 there is a substantial threat of discharge of oil or hazardous materials, commercial
12 divers must also comply with the Occupational Safety and Health Administration
13 (OSHA) training and operational standards for Hazardous Waste Operations and
14 Emergency Response (HAZWOPER). Divers should provide proof of HAZWOPER
15 training, proof that they participate in a medical monitoring program with their
16 employers, and evidence that they have completed the annual refresher training,
17 before commencing diving operations. The Safety Officer should supplement his or
18 her site-specific safety plan and on-site safety audits with a safety checklist for
19 contaminated water diving if divers are used to locate non-floating oils. See Section
20 9412, “Non-floating Oils Response Tool” for details on response techniques,
21 equipment capabilities, and considerations for non-floating oil spill response. The
22 American Petroleum Institute (API) Technical Reports in Attachment C of the
23 9412 tool contain additional information on diving operations and safety
24 considerations for non-floating oil response:

- 25 ■ API Technical Report 1154-1, Section 6: Diving in Oil Contaminated
26 Water¹
- 27 ■ API Operational Guide, Report 1154-2, Section 7: Safety Considerations²
- 28

29 **2233 Safety Officer Function and Flammable Materials/Volatile** 30 **Oils**

31 Because of high concentrations of light hydrocarbons in volatile oils, the potential
32 for fire and explosion is the single largest risk to responders and public health.
33 Examples of such products includes, but is not limited to, gasoline, condensate
34 and Bakken crude. Extreme caution should be exercised especially during the
35 initial stages of response. Section 3320.1, “Tactical Response Options, Gasoline and
36 Other Flammable Liquids” and Section 4622 “Gasoline and Other Flammable
37 Liquids Response Policy” provide guidance on the response challenges and strategies
38 with gasoline and other products with light ends. Operations should also refer to
39 general response guidelines in the 2012 Emergency Response Guidebook
40 prepared by the United States Department of Transportation – Pipeline and

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.

1 Hazardous Materials Safety Administration and Transport Canada. Bakken is not
2 listed by name, but falls under Petroleum Crude Oil.

3

4 **2234 Safety Officer Function and Crude Oil**

5 During the initial days of spill response, the major components of concern to
6 human health in crude oils include the volatile compounds— benzene, toluene,
7 ethylbenzene, and xylenes (collectively called BTEX) and hydrogen sulfide
8 (H₂S)—that can result in acute and sublethal effects via inhalation exposure.
9 Extreme caution should be exercised especially during the initial stages of
10 response.

11

12 **2235 Safety Officer Sampling and Monitoring Requirements**

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

- 15 1) Evaluate the need for medical monitoring of response personnel
- 16 2) Help determine if samples need to be shipped as dangerous goods
- 17 3) Monitoring for health and safety hazards during initial site entry
 - 18 a) Make visual observations of the site to detect signs of actual or potential
 - 19 chemical, physical, and biological hazards immediately dangerous to life
 - 20 and health (IDLH) or other dangerous conditions
 - 21 b) Conduct representative air monitoring with direct reading test equipment,
 - 22 when the preliminary site evaluation does not eliminate the potential for
 - 23 ionizing radiation or IDLH conditions
 - 24 c) Assess the following:
 - 25 i) Potential IDLH conditions
 - 26 ii) Exposure over radioactive material dose limits
 - 27 iii) Potential exposure over permissible exposure limits (PEL's) or other
 - 28 published exposure levels
 - 29 iv) Other dangerous conditions such as the presence of flammable or
 - 30 oxygen-deficient atmospheres
 - 31 v) Physical hazards
 - 32 4) Evaluating employee exposure to hazardous substances during clean-up
 - 33 operations
 - 34 a) Identify the type of personnel monitoring and environmental sampling you
 - 35 plan to use, including instrumentation
 - 36 b) Include requirements for maintaining and calibrating the monitoring and
 - 37 sampling instrumentation used
 - 38 c) Monitor whenever employees may be exposed to concentrations
 - 39 exceeding PEL's or other published exposure levels
 - 40 d) Evaluate employees who are likely to have the highest exposure:
 - 41 i) Monitor all employees who are likely to have the highest exposure to
 - 42 hazardous substances or health hazards above the PEL
 - 43 ii) Use personal sampling frequently enough to characterize the exposures
 - 44 of these employees
 - 45 iii) When results indicate exposure over PEL, identify all employees likely
 - 46 to have been exposed to levels above that PEL

- 1 5) Conduct monitoring when the possibility of one of the following exists:
2 a) An atmosphere that is immediately dangerous to life and health; OR
3 b) A flammable atmosphere; OR
4 c) Employee exposures above PEL.
5

6 **HUMAN SAFETY OVERRIDES ALL OTHER CONSIDERATIONS**
7 **DURING A RESPONSE**
8

9 **2240 Liaison Officer**

10 Given the importance of the Liaison Officer (LNO) duties, and to ensure public
11 confidence and trust, it is the policy of the RRT/NWAC for the LNO position to
12 be filled by a qualified representative of a federal, state, tribal, or local agency, if
13 available. If no such agency representative is initially available, qualified, or
14 willing to be the LNO, an RP representative may, upon the UC's concurrence, fill
15 that role. Furthermore, a transition to an RP designated LNO may occur with the
16 concurrence of the UC. The RRT/NWAC also encourages responsible parties to
17 designate an Assistant LNO to participate in the meetings attended by the LNO.
18

19 [See Section 9210, "Liaison Manual."](#)
20

21 **2241 Liaison Function and Use of Dispersants**

22 Once UC sets objectives to consider the use of dispersants, it is critical that
23 Liaison prepares for communication with stakeholders, including elected officials.
24 Stakeholder meetings should be scheduled as soon as possible to provide a
25 mechanism for sharing information and addressing concerns. Liaison should be
26 ready to provide first initial, and then reliable and continuous, updates to
27 stakeholders once the decision to use dispersants is made.
28

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

- 31 ■ Background and scientific information;
- 32 ■ Decision process and area plan policies for dispersant use;
- 33 ■ Seafood tainting concerns posed by dispersants;
- 34 ■ Risk communication;
- 35 ■ Discussion of net environmental benefit analyses and species of special
36 concern; and
- 37 ■ Monitoring policies established for the spill.
38

39 The LNO will review the EU Dispersant Recommendation Memo prior to its
40 submission to the UC for consideration and will work with the EUL to ensure that
41 the memo meets the needs of the LNO.
42

43 **2250 Natural Resource Damage Assessment**

44 Natural Resource Damage Assessment (NRDA) involves identifying the type and
45 degree of impacts on public biological and cultural resources in order to assist in

1 restoring those resources. NRDA may involve a range of field surveys and studies
2 used to develop a monetary damage claim, or may involve immediately
3 developing a restoration plan with the RP. NRDA activities for small spills
4 typically involve simplified assessment methods and minimal field data
5 collection.

6
7 Given that the goals of NRDA are outside the sphere of most emergency spill
8 response actions, NRDA activities generally do not occur within the structure,
9 processes, and control of the ICS. However, particularly in the early phases of a
10 spill response, many NRDA activities overlap with environmental assessment
11 performed for the sake of spill response. Because NRDA is carried out by natural
12 resource trustee agencies and/or their contractors, personnel limitations may
13 require staff to perform NRDA and response activities simultaneously. Therefore,
14 NRDA staff should remain coordinated with the spill response organization and
15 need to work with the LNO to coordinate with the UC, EU, Wildlife Branch and
16 the National Oceanic and Atmospheric Administration Scientific Support
17 Coordinator to resolve any problems or address areas of overlap. While NRDA
18 resource requirements and costs may fall outside the responsibility of the
19 Logistics and Finance sections, coordination is again important.

20

21 **2260 Incident Investigation**

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