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2000 Command

2100 Unified Command

The National Contingency Plan (NCP) states that the basic format for the response management system is a structure that brings together federal and state agencies, and the RP, to achieve an effective and efficient response. This structure is commonly referred to as the Unified Command (UC). It should be noted that in this structure, the FOSC retains ultimate authority in a response operation for decisions relating to the response operation. However, the FOSC will exert his/her own authority independent of the UC, only if other members are not present or are unable to reach consensus within a reasonable time frame.

The UC is responsible for the overall management of the incident. They direct incident activities, including the development and implementation of strategic decision, and approve the order and release of resources. In addition, the Command Staff includes a Safety, Information, and Liaison Officer. The UC oversees and delegates responsibilities to four functional units: Operations, Planning, Logistics and Finance/ Administration Sections.

2110 Responsibilities

Refer to [FOG 2000, IC Responsibilities](#) for a list of duties.

2120 Objectives

2120.1 0-4 Hours

- Confirm spill.
- Secure spill source.
- Evaluate the extent of incident.
- Dispatch resources to scene.
- FOSC Representative reports to site.
- Conduct notification of all concerned local, county, state, and federal agencies.
- Mobilize cleanup contractor as possible.
- Section Chiefs will organize their section's objectives as detailed in [3120 Operations Objectives](#), [4120 Planning Objectives](#), [5110.1 Logistics Objectives](#), [6200 Finance Objectives](#).

2120.2 4-24 Hours

- Continue gathering information on the extent of the spill.

- Implement ICS/UCS.
- Begin relocation of Incident Command functions from Incident Command Post at scene to a suitable Unified Command Post (when identified).
- Command and General Staffs meet and develop initial response strategies and objectives.
- Unified Commanders meet to establish relationships, develop overall response objectives, identify funding methods, confirm media relations approach.
- Liaison officer will initiate contact with local municipalities, opening dialogue and establishing a communication conduit.
- Safety Officer will develop first draft of the Site Specific Safety and Health Plan, by coordinating with contractor and government plans.
- Information Officer will prepare first press release, establish Joint Public Information Center, and organize first media briefing.
- Section Chiefs will organize their section's objectives as detailed in [3120 Operations Objectives](#), [4120 Planning Objectives](#), [5110.1 Logistics Objectives](#), [6200 Finance Objectives](#).

2120.3 24-48 Hours

- Transit from immediate operations driven response posture to a pre-planned operations response posture. By the second day, a good understanding of the extent of the spill and overall objectives should be appreciated by all concerned.
- Expand ICS/UCS as necessary.
- Command and General Staffs implement daily meeting cycles to ensure information flow. As a minimum, these meetings should include:
 1. Situation Briefing detailing projected daily operational period achievements and shortfalls, and projected shifts in planning to accommodate such shortfalls. (These briefings are informative in nature and not intended as decision meeting.)
 2. Tactical meetings create the blueprint for tactical deployment during the next operational period. In preparation, Section Chiefs take the information outlined in situation briefings and assess work progress against incident objectives. The Section Chiefs then jointly develop primary and alternative strategies for meeting these objectives, to be considered at the next planning meeting.

3. Planning meetings develop incident objectives, strategies, and tactics, as well as, identify resource needs for next operational period. Immediately following these meetings, attendees prepare their assigned components for the Incident Action Plan (IAP) for the approval of the UC.
4. Operations Briefings convey the IAP to the oncoming shift.
 - Liaison Officer will maintain contact with effected municipalities ensuring their needs and concerns are passed to Unified Commanders.
 - Safety Officer refines the Site Specific Safety and Health Plan ensuring that all personnel are appropriately briefed.
 - Information Officer continues media liaison activities and preparing press releases.
 - Section Chiefs will organize their section's objectives as in [3120 Operations Objectives](#), [4120 Planning Objectives](#), [5110.1 Logistics Objectives](#), [6200 Finance Objectives](#).

2130 Command Representatives

2130.1 Federal Representative

1. The OSC is the pre-designated Federal official responsible for ensuring immediate and effective response to a discharge or threatened discharge of oil or a hazardous substance. The U.S. Coast Guard designates OSCs for the U.S. Coastal Zones, while the EPA designates OSCs for the U.S. Inland Zones, as delineated by 40 CFR 300.
2. The first Federal official affiliated with an NRT member agency to arrive at the scene of a discharge, should coordinate activities under the NCP and is authorized to initiate, in consultation with the OSC, any necessary actions normally carried out by the OSC until the arrival of the pre-designated OSC. This official may initiate Federal Fund-financed actions, but only as authorized by the OSC.
3. Where appropriate, the OSC shall establish a UC consisting of the FOSC, the SOSC, and the RP Incident Manager. The OSC is responsible for assigning individuals from within the response community (federal, state, local or private), as necessary, to fill the designated positions in the NRS a single individual may fill several of the designated positions. These assignments will be based on the nature of the spill and the need for extensive manning.

These positions and their responsibilities are as follows:

A. Information Officer - Responsible for the coordination and release of all media releases and the scheduling of press conferences related to the incident. The IO may also establish a Joint Information Center (JIC) to facilitate the coordinated release of available information.

B. Liaison Officer - Responsible for coordinating with outside agencies, individuals, or groups involved in the response.

C. Safety Officer - Responsible for the safety of all activities associated with the response and compliance with applicable safety laws and regulations. Also responsible for assessing hazardous and unsafe situations, and developing measures for assuring personnel safety.

D. Operations Chief - Responsible for management of the tactical response to the discharge, including containment and cleanup efforts.

E. Planning Chief - Responsible for the development of strategies for the containment and cleanup of the discharge.

F. Logistics Chief - Responsible for ensuring that the necessary personnel and equipment are obtained and delivered to conduct response operations.

G. Finance Chief - Responsible for the accounting management of fund expenditures, including documentation for claims and cost recovery. A NPFC representative will typically staff this position.

4. The OSC shall, to the extent practicable, and as soon as possible after the incident occurs:

- Collect pertinent facts about the discharge, such as its source and cause.
- Identify the Responsible Party.
- Identify the nature, amount, location, and trajectory of discharged materials.
- Determine whether the discharge is a worst case discharge.
- Determine the pathways to human and environmental exposure.
- Determine the potential impact on human health, welfare, safety and the environment.
- Determine whether the discharge poses a substantial threat to the public health or welfare.
- Determine the potential impact on natural resources and property which may be affected.

- Determine priorities for protecting human health, welfare and the environment.
- Initiate appropriate resource documentation.

5. The OSC's efforts shall be coordinated with other appropriate federal, state, local, and private response agencies. An OSC may designate capable individuals from Federal, State, or local agencies to act as her/his on-scene representatives. State and local governments, however, are not authorized to take actions under Subpart D of the National Contingency Plan (NCP) that involve expenditures of the Oil Spill Liability Trust Fund (OSLTF) unless a Pollution Removal Funding Authorization (PFRA) has been completed between the FOSC and local government representative.

6. The OSC should consult with the Regional Response Team (RRT), when necessary, in carrying out the requirements of the NCP and keep the RRT informed of activities under the NCP.

7. In the instances where a possible public health emergency exists, the OSC should notify the Health and Human Services (HHS) representative to the RRT. Throughout response actions, the OSC may call upon the HHS representative for assistance in determining public health threats and call upon the Occupational Safety and Health Administration (OSHA) and HHS for advice on worker health and safety problems.

8. The OSC shall ensure that the trustees for National Resource Trustees are promptly notified of discharges. The OSC shall coordinate all response activities with the affected Natural Resource Trustees and shall consult with the affected trustees on the appropriate removal action to be taken. When the OSC becomes aware that a discharge may affect any endangered or threatened species, or their habitat, the OSC shall consult with the appropriate Natural Resource Trustee.

9. The OSC shall submit pollution reports to the RRT and other appropriate agencies as significant developments occur during response actions, through communications networks or procedures agreed to by the RRT and covered in the RCP.

10. OSCs should ensure that all appropriate public and private interests are kept informed and that their concerns are considered throughout a response, to the extent practicable.

2130.2 State Representative

The State OSC is responsible to ensure all pertinent resource, cultural, archaeological, environmental, and economic issues are discussed and decisions within the UC are based on sound, state specific information. This individual must be empowered to make timely decisions with minimal internal agency consultation.

2130.3 Responsible Party (RP) Representative

Under the Federal Water Pollution Control Act (FWPCA) and the Oil Pollution Act of 1990 (OPA 90), the RP has primary responsibility for the cleanup of a discharge. Section 4201(a) of OPA 90 states that an owner or operator of a tank vessel or facility participating in removal efforts shall act in accordance with the NCP and the applicable response plans as required. Section 4202 of OPA 90 states that these response plans shall be consistent with the requirements of the NCP and ACPs. Each owner or operator of a tank vessel or facility is required by OPA 90 to submit a response plan, and shall, do so in accordance with applicable regulations. Facility and tank vessel response plan regulations, including plan requirements, are located in 33 CFR Parts 154 and 155, respectively.

As defined in OPA 90, each RP for a vessel or a facility from which oil or a designated hazardous substance is discharged, or which poses a substantial threat of a discharge, into or upon the navigable waters or adjoining shorelines or the Exclusive Economic Zone (EEZ) is liable for the removal costs and damages specified in Subsection (b) of Section 1002 of OPA 90. Any removal activity undertaken by a RP must be consistent with the provisions of the NCP, the Regional Contingency Plan (RCP), the ACP, and the applicable response plan required by OPA 90. Each RP for a vessel or facility from which a hazardous substance is released, or which poses a substantial threat of a discharge, is liable for removal costs as specified in the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 U.S.C. 9601 et seq.).

2140 Guidance for Setting Response Objectives

The Unified Command will agree upon response objectives early in the response (4-24 Hours). Refer to [FOG 200, Response Objectives](#).

2150 General Response Priorities

The Unified Command will agree upon response priorities early in the response (4-24 Hours). Refer to [FOG 200, Response Priorities](#).

2200 Safety

The Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The Safety Officer will correct unsafe acts or conditions through the regular line of authority, although he/she may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan, and includes safety messages in each Incident Action Plan. Refer to [FOG 2000, Safety Officer](#) for a list of duties.

2210 Site Characterization

2220 Site Safety Plan Development

At a minimum, the plan should include health and safety hazard analysis for each site, task or operation with a comprehensive operations work plan. This should address personnel training requirements, personal protective equipment selection criteria, and confined space entry procedures. In addition, it should detail an air monitoring plan, site control measures, and the format for pre-entry and pre-operations briefings.

The site safety plan will require information from all of the contractors, the RP, the federal and state agencies involved.

An ICS compatible [Site Safety Plan Forms](#) and [Specific Hazard Attachment](#) may be used to create the Site Safety Plan.

2300 Information Officer

The Information Officer is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to other appropriate agencies and organizations.

Only one Information Officer will be assigned for each incident, including incidents operating under UC and multi-jurisdictional incidents. The Information Officer may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions. Refer to [FOG 2000, Information Officer](#) for a list of duties.

2310 Protocol for Access/Timing of Media Briefings

2320 Joint Information Center (JIC)

During a major oil spill where media activity is expected to last several days, the lead Information Officer (IO) should establish a Joint Information Center (JIC) to coordinate the Public Affairs activities of participating agencies and parties. The role of the JIC is to provide multiple phone lines for incoming calls, staffed by knowledgeable individuals; and ensure State and Federal Government Public Affairs Officers (PAOs) are available to the media. In addition the JIC develops and produces joint news releases under the UC, and schedules, organizes, and facilitates news conferences.

It is recommended that the JIC be in the same building as the Command Center, but in a room separate from other sections. PAOs need to be close to the UC and other sections for effective communication, but not so close as to disturb response operations. Equipment needs for the JIC vary, dependent on the size and impact of the incident, and media and public interest levels. If possible, a separate "Press Room" should be established for reporters' use, at spills that attract a great deal of media interest. This room may be used by reporters covering the story, and would ideally be equipped with several phone lines, electrical outlets, and a couple of desks, tables and chairs. There should be a way to display maps, status boards, and other visual aids that could be used on-camera, and a table near the door for the latest news releases, fact sheets, and advisories. If there is room for seating and a podium with PA system, the press room is a good site for all formal news conferences. This allows TV news crews to set-up cameras in advance, and reporters to do stand-ups and call-ins from an easy, central location.

2330 Media Contacts

See Section 9260 for a detailed list of media contacts.

2400 Liaison

Incidents that are multi-jurisdictional, or have several agencies involved, may require the establishment of the Liaison Officer position on the Command Staff. Refer to [FOG 2000, Liaison Officer](#) for a list of duties.

2410 Investigators

The National Transportation Safety Board (NTSB) often investigates accidents resulting in large oil or hazardous substance discharges.

2420 Federal/State/Local Trustees

2420.1 Identification Of Lead Administrative Trustee (LAT)

The Natural Resource Trustee will notify the U.S. Coast Guard of the LAT as soon as possible after an oil spill. As required by E.O. 12777 (October 22, 1991), the Federal Natural Resource Trustee must select a LAT. Depending on the resources at risk and other relative factors, it might be appropriate for the LAT to be a non-federal agency. In such cases, the Federal Natural Resource Trustees would still select a Federal LAT for the purpose of coordination with the representatives of the Oil Spill Liability Trust Fund (OSLTF) to initiate the damage assessment. The non-federal LAT will coordinate all other damage assessment activities.

The Natural Resource Trustees intend to execute a general Memorandum of Agreement (MOA) to coordinate their damage assessment and restoration activities. Among other things, the MOA will identify trustees, establish criteria for selecting a LAT, and provide procedures for decision making and handling any monetary recovery efforts.

2420.2 Trustee Funding

2420.2.1 Contacts with Responsible Party (RP)

The RP should be the primary funding source for the Natural Resource Damage Assessment (NRDA). The trustees will need early access to representatives of the RP to determine the availability of funding, personnel, and equipment for damage assessment activities. The LAT will first notify the appropriate U.S. Coast Guard representative and request that a meeting be arranged between the Natural Resource Trustees and the RP's representative. Should the U.S. Coast Guard fail to arrange a meeting in a timely fashion, the Natural Resource Trustees will establish contact directly with the RP's representative. When the RP is unknown, contacting the RP is not feasible, or the RP is unwilling or unable to provide funds, the LAT may request funding from the OSLTF.

2420.2.2 Lead Administrative Trustee (LAT) Access to the Oil Spill Liability Trust Fund (OSLTF)

The Federal LAT must submit a request for initiation of a NRDA to the National Pollution Fund Center (NPFC) to secure a funding obligation following an oil spill. The request must include: the amount requested, the plan for fund use, an estimated completion date, an agreement for subrogation of all cost recovery actions, an agreement to comply with NPFC documentation requirements, and a certification of lead trustee status. Based on the request for initiation, an Interagency Agreement (IAG) will be executed for each OPA incident, establishing the amount of funds authorized for initiation. The NPFC will assign a document control number to track costs.

The Federal LAT is responsible for documenting expenditures and submitting the documentation to the NPFC. In order for the trustee agencies to be funded for their activities all operations must be conducted in compliance with the procedures set forth by the NPFC in the Technical Operating Procedures (TOPS) for Resource Documentation Guidelines for Natural Resource Trustees.

The Federal LAT is expected to manage the funds available for initiation of NRDA. Whenever it appears that actual costs may exceed the amount of the IAG, the LAT should promptly request supplemental funding in the same manner as the original request. Until the IAG is amended to reflect supplemental funding, the LAT must take action to prevent exceeding the obligated amount.

2430 Agency Representatives

In many incidents involving multiple jurisdictions, an agency or jurisdiction will send a representative to assist in coordination efforts.

An Agency Representative is an individual assigned to an incident from an assisting or cooperating agency, who has been delegated authority to make decisions on matters affecting that agency's participation at the incident. Agency Representatives report to the Liaison Officer or to the Incident Commander in the absence of the Liaison Officer. Refer to [FOG 2000, Agency Representative](#) for a list of duties.

2440 Stakeholders

2440.1 Environmental

2440.1.1 Natural Resource Damage Assessment (NRDA) Representative

The NRDA Representative is responsible for coordinating NRDA needs and activities of the trustee team within the ICS spill response operations. This includes close coordination with the Liaison Officer for obtaining timely information on the spill and injuries to natural resources. The representative will coordinate NRDA or injury determination activities. Refer to [FOG 2000, NRDA Representative](#) for a list of duties.

2440.2 Economic

2440.3 Political

2500 Reserved

2600 Reserved

2700 Reserved

2800 Reserved



2900 Reserved for US



Area/District