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From: Commander, Seventh Coast Guard District

To: Distribution

Subj: SUPPORT OF FEDERAL RESPONSE PLAN ACTIVITIES

1. Throughout this past year, Commandant (G-MOR) has been pursuing a more active role for the Coast Guard within the Federal Emergency Management Agency's (FEMA) Federal Response Plan (FRP). The FRP provides the mechanism for coordinating the delivery of federal assistance and resources to augment efforts of State and local governments overwhelmed by a major disaster or emergency in accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act. Specifically, there has been a revision to Emergency Support Function (ESF) #10.
2. ESF #10 is the Hazardous Materials Annex to the FRP that provides federal support to State, Commonwealth, and local governments in response to an actual or potential discharge and/or release of hazardous materials (including oil) following a major disaster or emergency. The ESF change leaves U.S. Environmental Protection Agency (EPA) as the lead agency and Chair of ESF #10. However, the Coast Guard now becomes the Regional Incident Chair of ESF #10 for a disaster or emergency affecting areas under Coast Guard jurisdiction.
3. We don't see this as a major burden or change on how we have been responding in the field to date. Response actions delineated within ESF #10 have always indicated that the federal government would respond to pollution incidents during a disaster in accordance with the National Contingency Plan (NCP). The Coast Guard within this District has always responded to oil and hazardous substance incidents under FEMA during a disaster event in the coastal zone where the Coast Guard is the pre-designated On Scene Coordinator (OSC). The ESF change just formalizes what we have been doing informally. Weapons of Mass Destruction (WMD) response will become more of a challenge although I understand that Headquarters has taken the position that we would stay clear of biological WMD issues and concentrate on response to chemical incidents, which we do now for industrial accidents. Further guidance will be forthcoming once more information on our intended WMD response posture becomes available.
4. However, we do anticipate a change in expectations at the regional level. In the past, we have never had the requirement to staff ESF #10 at the FEMA formed Disaster Field Office (DFO) or in support of the various ESF Emergency Response Advance Teams (ERTA) which routinely locate at the State Emergency Operations Centers (EOC). We will now be expected to support ESF #10 activities especially if the focus of the response is exclusively within the coastal zone. When the FRP has been activated for hurricanes and other applicable disasters, the Seventh District marine safety program has traditionally provided personnel to support DOT's involvement with ESF #1. We will now support both ESFs, within a specific DFO or ERTA,

which will require a minimum of four people to adequately staff a 24 hour watch schedule (2

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people for each ESF staff).

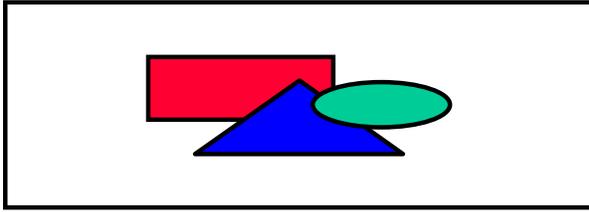
5. We will continue to support the ESF staffing needs by using District personnel attached to a unit or MSO that will not be impacted by the disaster or emergency. To assist you in managing expectations, please be prepared to support a portion of this need from your unit should a situation arise. However, it is our intent not to degrade the readiness of a unit that may be impacted by the incident causing the activation of the FRP. If the impending disaster or emergency is gradual in its escalation, your input in identifying your operational needs early in the preparedness and planning process is important. After looking at the operational availability of District resources and finding that none are available to support this need, we will pursue resources outside of the District to properly support FEMA activities.

6. We encourage each Marine Safety Office to ensure that unit personnel identified for possible deployment in support of FEMA emergency response activities are familiar with the FRP and the functions of the ESF they will be augmenting. A copy of the revised FRP is available on the internet and can be accessed through the FEMA web site at <http://www.fema.gov> or more specifically <http://www.fema.gov/r-n-r/frp/>.

WILLIAM H. FELS  
By direction

Encl: (1) Executive Summary of Revision to Emergency Support Function #10, "Hazardous Materials" Annex to the Federal Response Plan dated April 1999  
(2) Emergency Support Function #10, "Hazardous Materials" Annex to the Federal Response Plan dated April 1999

Dist: All CGD SEVEN MSOs



## **Emergency Support Function #10, Federal Response Plan Revision Dated April 1999**

### **Executive Summary**

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**Purpose.** This document summarizes the role for the Coast Guard (USCG) within the Federal Emergency Management Agency's (FEMA) revised Federal Response Plan (FRP) dated April 1999. Specifically, our focus concerns the USCG and the marine safety program support to Emergency Support Function (ESF) #10.

#### **Background.**

The Federal Emergency Management Agency (FEMA), on June 4, 1999, issued an updated version of the plan for mobilizing and deploying federal resources for people and communities overwhelmed by natural disasters and manmade emergencies. The Federal Response Plan serves as the principal organizational guide for defining the roles and responsibilities of the 26 federal member agencies and the American Red Cross that are engaged to deliver a broad range of emergency aid during a major crisis.

The revised plan incorporates 11 changes and other modifications that result from the lessons learned and the experiences of the nation's federal partners since first employed during Hurricane Andrew in 1992. The plan is more consistent with current policy guidance and new ways of doing business, significantly improving the nation's response capabilities for aiding distressed states immediately and expediting their recovery.

Among the key revisions is the addition of a new evolving Recovery Function Annex, which begins the integration of recovery and mitigation functions into the plan's response structure. The updated plan also includes four new support function annexes covering Community Relations, Donations Management, Logistics Management and Occupational Health and Safety, and two new appendices for Federal Response Plan Changes and Revisions, and Overview of a Disaster Operation.

Additionally, the revised plan reinforces the use of Incident Command System principles, mentions the importance of private sector partnerships, and describes several new response resources, coordinating mechanisms and management tools. There is also an updated version of the Terrorism Incident Annex, originally published in February 1997.

The full text of the revised plan is currently available on FEMA's World Wide Web site (<http://www.fema.gov/r-n-r/frp/>). Printed copies can be ordered free of charge as they become available from FEMA's Publications Office at 1-800-480-2520.

Federal Emergency Management Agency (FEMA), Office of Emergency Information & Public Affairs provides information 24 hours a day from the following venues:

- on the World Wide Web: <http://www.fema.gov>
- via fax-on-demand: phone in the U.S.A. (202) 646-FEMA (646-3362);
- via digital audio for broadcasters & print: contact [eipa@fema.gov](mailto:eipa@fema.gov); and
- listening to the FEMA Radio Network on the FEMA Website using RealAudio.

**ESF #10 Discussion.** The FRP provides the mechanism for coordinating the delivery of federal assistance and resources to augment efforts of State and local governments overwhelmed by a major disaster or emergency in accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act. ESF #10 is the Hazardous Materials Annex to the FRP and provides federal support to State, Commonwealth, and local governments in response to an actual or potential discharge and/or release of hazardous materials (including oil) following a major disaster or emergency.

As an element of the FRP, ESF #10 may be activated under one of the following conditions:

- In response to a disaster for which the President (through the Federal Emergency Management Agency (FEMA)) determines that federal assistance is required to supplement the response efforts of the affected state, commonwealth, and local governments, under the Robert T. Stafford Disaster Relief and Emergency Assistance Act; or
- In anticipation of a major disaster or emergency that is expected to result in a declaration under the Stafford Act.

### **Disaster/Emergency Pollution Response; FRP Concept of Operations.**

The federal response, in accordance with the FRP, to releases of “hazardous materials” is carried out under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300). When the FRP was activated in the past, we had informally responded in accordance with the NCP. The revision formally delineates this responsibility for the USCG.

In summarizing the concept of operations, the EPA will serve as the National Chair and lead agency for each activation of ESF #10, with close coordination with the USCG in geographic locations under USCG jurisdiction. EPA will be the ESF #10 Regional Chair in preparedness and for ESF #10 activations in response to disaster or emergencies affecting areas under EPA jurisdiction. The USCG will be the ESF #10 Regional Incident Chair for a disaster or emergency affecting only areas under USCG jurisdiction.

The revision now places the USCG in the lead for essentially coastal zone incidents with our federal region. The operational response prescribed in the NCP and any

agency implementing procedures that contribute to response will be coordinated through this ESF. This ESF will promote an efficient, coordinated, and effective response to discharges or releases of hazardous materials that threaten human health, welfare, or the environment. In conjunction with the state, the ESF will coordinate the provision of support and the overall management to the various response sites to ensure actions are taken to mitigate, clean up, and dispose of hazardous materials and minimize the impact of the incidents. The ESF promotes close coordination with federal, state, commonwealth, and local officials to establish priorities for response support.

A natural or other disaster could result in numerous situations in which hazardous materials are released into the environment. Fixed facilities (e.g., chemical plants, tank farms, laboratories, operating hazardous waste sites, etc.) that produce, generate, use, store, or dispose of hazardous materials could be damaged so severely that existing spill control apparatus and containment measures are not effective. Hazardous materials that are transported may be involved in rail accidents, highway collisions, or waterway mishaps. Abandoned hazardous waste sites could be damaged, causing further degradation of holding ponds, tanks, and drums. The damage to, or rupture of, pipelines transporting materials that are hazardous if improperly released will present serious problems. Disaster recovery procedures could generate hazardous materials threats to the public health or welfare or to the environment. Terrorism incidents could occur involving WMD. Upon activation of ESF #10, one or more Coast Guard On Scene Coordinators (OSC) may be expected to coordinate and direct oil and hazardous substance removal actions within the affected coastal zone areas.

ESF #10 provides for a coordinated response to actual or potential discharges and/or releases of hazardous materials by placing the response mechanisms of the NCP within the FRP coordination structure that ensures the most efficient and effective use of federal resources. The ESF includes the appropriate actions to prevent, minimize, or mitigate a threat to public health, welfare, or the environment caused by actual or potential hazardous material incidents. Response to oil discharges and hazardous substance releases will be carried out in accordance with the NCP.

**FRP Definition of Hazardous Materials.** Within the context of ESF #10, the term “hazardous materials” is defined broadly to include:

- Oil;
- Hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended;
- Pollutants and contaminants defined under Section 101(33) of CERCLA; and
- Certain chemical, biological, and other weapons of mass destruction (WMD).

In addition, ESF #10 may respond to actual or threatened releases of hazardous materials not typically responded to under the NCP but that, as a result of the disaster or emergency, pose a threat to public health or welfare or to the environment.

Appropriate response activities include but are not limited to, household hazardous waste collection, permitting and monitoring of debris disposal, water quality monitoring and protection, air quality sampling and monitoring, and protection of natural resources.

### **CGD SEVEN Coast Guard Actions.**

The Coast Guard within this District has always responded to oil and hazardous substance incidents under FEMA during a disaster event in the coastal zone where the Coast Guard is the pre-designated On Scene Coordinator (OSC). The ESF change just formalizes what we have been doing informally. Weapons of Mass Destruction (WMD) response will become more of a challenge although USCG Headquarters has taken the position that the USCG would stay clear of biological WMD issues and concentrate on response to chemical incidents.

However, we do anticipate a change in expectations at the regional level. In the past, we have never had the requirement to staff ESF #10 at a FEMA formed Disaster Field Office (DFO) which is normally located at the State Emergency Operations Center (EOC). We will now be expected to support ESF #10 activities especially if the focus of the response is exclusively within the coastal zone. When the FRP has been activated for hurricanes and other applicable disasters, the Seventh District marine safety program has traditionally provided personnel to support DOT's involvement with ESF #1. We will now support both ESFs, within a specific DFO, which will require a minimum of four people to adequately staff a 24 hour watch schedule (2 people for each ESF staff).

We will continue to support the ESF staffing needs by using District personnel attached to a unit or MSO that will not be impacted by the disaster or emergency. To assist commands in managing expectations, units should be prepared to support a portion of this need should a situation arise. However, it is District's intent not to degrade the readiness of a unit that may be impacted by the incident. If the impending disaster or emergency is gradual in its escalation, command input in identifying your operational needs early in the preparedness and planning process is important. After looking at the operational availability of District resources and finding that none are available to support this need, the staff will pursue resources outside of the District to properly support FEMA activities.