



## PROCEDURES FOR ACCESSING THE FUNDS

- I. Oil Overview: These procedures apply to FOSCs (either Coast Guard or EPA) who are performing oil removal operations under the National Contingency Plan and require funding support from the OSLTF.
  - a. The FOSC accesses CANAPS via the Internet and requests issuance of an FPN and a corresponding ceiling amount. NPFC then works with FINCEN to establish and fund an accounting line.
  - b. CANAPS will confirm via email and issue all necessary notifications by priority message. CANAPS generates the message format and sends it via CGMS.
  - c. Authorized users of CANAPS can act as surrogates to request a ceiling on behalf of other authorized users when their access to CANAPS is disrupted. District OPCENs have this authority/capability for units within their AOR, including EPA Federal On-Scene Coordinators (FOSCs)/Regions. EPA Regions are also able to act as surrogates for their FOSCs when available. The NPFC has the ability to act as a surrogate for any authorized CG or EPA field user of CANAPS. NPFC can also issue numbers manually in the event CANAPS is completely unavailable.
  - d. All ceiling messages, POLREPS, or other messages related to incidents accessing the OSLTF shall include the following info addrees in addition to current reporting requirements: FOSC, NPFC, CG FINCEN, the SILC contracting branch, and the appropriate District (drm/dmf).
  - e. If no funding was expended against an FPN for the removal, the FOSC can request cancellation of the FPN via CANAPS.
  - f. The FOSC ensures that obligations from the OSLTF remain within the authorized ceiling, and if necessary, promptly obtains additional ceiling via CANAPS.
  - g. FPN Construction.
    - i. For Coast Guard cases CANAPS uses a smart numbering scheme, ensuring the ability of the user to identify the CG district, fiscal year, and sequential number of the case. To avoid overlapping of current cases, the FPN is an alphanumeric value where the first character is a letter delineating the CG district, the second and third characters are the fiscal year, and characters four through six are the sequential number of each district's cases, which can be alphanumeric if necessary.
    - ii. All EPA FPN's start with the letter "E" followed by the two-digit fiscal year. The fourth character indicates the number of the EPA region with a "0" indicating EPA region 10. The last two characters are sequential based on the number of FPN's issued to that region in that fiscal year.
- II. Hazardous substances/CERCLA Overview: These procedures apply only to CG FOSCs who are performing hazardous substance response operations under the National Contingency Plan and require funding support from SUPERFUND, also known as the CERCLA Fund.



- a. The CG FOSC accesses CANAPS via the internet and request issuance of a CERCLA Project Number (CPN) and a corresponding ceiling amount. CANAPS prepares all record message traffic via CGMS and delivers it to the appropriate units. NPFC then works with FINCEN to establish and fund an accounting line.
- b. Initial CERCLA ceiling requests will not exceed \$250,000. NPFC receives limited CERCLA funding authority from EPA each year to fund all ceilings. An Action Memorandum prepared by the FOSC must support funding requests that are equal to or greater than \$250,000. See Sub tab “Action Memo Guidance” for guidance on CERCLA Action Memorandums. If the nature of the emergency requires a higher initial ceiling, the NFPC will coordinate such requests with the CG FOSC, CG District, COMDT (CG-533), and the EPA on a case-by-case basis.
- c. All messages, POLREPS, or other messages related to the incident where CERCLA/ SUPERFUND has been accessed shall include the FOSC, NPFC, CG FINCEN, cognizant Coast Guard District (drm/dmf), and cognizant SILC contracting branch as INFO addrees, in addition to current reporting requirements.
- d. The FOSC ensures that obligations from CERCLA remain within the authorized ceiling, and if necessary, promptly requests increased ceiling authorizations via CANAPS. The FOSC shall request the increase sufficiently in advance to avoid exceeding the ceiling at any point during response activities
- e. Special FOSC Requirements for CERCLA Incidents. The CG/EPA Memorandum of Understanding and its resulting funding agreement place special requirements on the FOSC.
  - i. If a response requires less than \$250,000 in funding, the FOSC must document a finding of imminent and substantial endangerment. This finding may be included in the situation description section of POLREP One, and at a minimum must include the following items.
    1. The hazardous substance(s), pollutant(s), or contaminant(s) involved;
    2. description of what is affected or threatened (people, animals, crops, drinking water, etc.;
    3. a statement indicating that the situation presents an imminent and substantial threat to public health, welfare, or the environment; and
    4. description of the response action necessary to neutralize the threat.



- ii. If a response requires \$250,000 or more, or will last more than two years, the FOSC must prepare an Action Memorandum in accordance with EPA guidance.
  1. The response can begin, but the Action Memorandum is required before reaching the \$250,000 limit. See Sub tab “Action Memo Guidance” for guidance on CERCLA Action Memorandums.
  2. If the nature of the emergency requires a higher initial ceiling, the NPFC will coordinate such requests with the CG FOSC, CG District, COMDT (CG-533), and the EPA on a case-by-case basis.

III. Strike Team support of EPA under CERCLA Overview: these procedures apply when CG Strike Team assets support the EPA on an EPA case. The CG efforts are funded from annual IAGs with the EPA that are managed within NPFC.

- a. The NPFC establishes an annual accounting string construct with each of the three CG Strike Teams that includes project number assignments.
- b. EPA requests CG Strike team services through the issuance of a Work Authorization Form (WAF) to a Strike Team. The Strike team shall forward the specific case information to the NPFC via CGMS. The information needed includes the following data.
  - i. EPA Site Name including County and State,
  - ii. Next CERCLA Project Number from the list provided by NPFC at the beginning of the fiscal year,
  - iii. EPA Region requesting the support, and
  - iv. Ceiling limit.
- c. NPFC then works with FINCEN to establish and fund an accounting line.
- d. The NPFC will facilitate any ceiling adjustments between the EPA and Strike Team.

IV. Disaster Pollution Funding Overview: these procedures apply when CG assets conduct a pollution response under ESF-10 (Emergency Response Function -10) resulting from a Presidential Disaster Declaration under the National Response Plan.

- a. FEMA controls Disaster funding for pollution response. Funding normally becomes available after a Presidential Disaster Declaration. The FEMA vehicle for disaster funding is a Mission Assignment (MA). An MA is both operational tasking and a funding document. An MA can come to the Coast Guard directly from FEMA or from the EPA (who receives the MA directly from FEMA).
- b. Disaster response funding is *not* distributed via CANAPS. If the field initiates a CANAPS FPN/CPN funding request prompted by a disaster NPFC will determine if FEMA has issued or will be issuing an ESF-10 MA. If an MA is forthcoming NPFC will initiate direct coordination with the District (drm) to establish DPN funding.



- c. NPFC will confirm that the District/Area has accepted the MA. The preferred confirmation approach is for the District/Sector to fax the MA to 202-493-6898, e-mail or telephone confirmation is also acceptable.
- d. NPFC will accept the funding on behalf of the Coast Guard and issue a message to the appropriate field units. The message will include the following details.
  - i. The appropriate accounting line with unique disaster project number (DPN),
  - ii. A direct reference to the applicable FEMA Mission Assignment Number,
  - iii. Guidance on actions appropriately funded by the DPN.
- e. NPFC then works with FINCEN to establish and fund an accounting line.
- f. Units should contact NPFC if assistance is needed accumulating cost documentation.