

**Project Summary Report on the  
Oil Spill Field Operations Guide (FOG) Update Project  
Sponsored by the States/British Columbia Oil Spill Task Force**

**June, 2000**

**Executive Summary**

The National Interagency Incident Management System (NIIMS) version of the Incident Command System (ICS), developed in the 1970s to integrate multiple fire fighting units during a fire response, has been adopted as the model for oil spill response. Many federal and state emergency response agencies are now required to use ICS. In addition, the response systems specified in vessel and facility oil spill contingency plans are required by many regulatory agencies to demonstrate compatibility with NIIMS ICS.

A group known as STORMS - for Standard Oil Response Management System - produced the first official oil spill response-focused ICS Field Operations Guide (FOG) in 1996. Following the 1998 Spill of National Significance (SONS) drill in Valdez, Alaska, the States/British Columbia Oil Spill Task Force facilitated a national effort focused on updating the 1996 Oil Spill FOG. The FOG Update Project Workgroup included representatives of the states of Alaska, Washington, Oregon, California, Texas, and Florida, and was open to other state representatives as well. The US Coast Guard was represented by their National Strike Force Coordination Center, the Response Office in Coast Guard Headquarters, and several West Coast Districts. Other US Federal agencies represented on the Workgroup included the Minerals Management Service, the National Oceanic and Atmospheric Administration, and the Environmental Protection Agency. Representatives from the Office of Pipeline Safety and the US Fish and Wildlife Service were included electronically. Numerous oil industry representatives, AWO, contractors, and transporters also participated. In addition, representatives from the National Wildfire Coordinating Group participated as advisors on NIIMS ICS protocols. The full FOG Update Project Workgroup met for a total of six two-day sessions beginning in December 1998 and ending in February 2000; most subcommittee sessions were conducted by conference call.

At the first FOG Update Project Workgroup meeting, there was consensus support for maintaining a standardized oil spill FOG nationwide, based on NIIMS ICS principles. The FOG Update Workgroup also agreed to review response position descriptions and topics covered in the 1996 FOG, and convened subcommittees to address these two areas. A subcommittee was also established to review oil spill response forms and recommend changes based on the need for consistency among users as well as flexibility in the field. The progress of these subcommittees was reviewed and discussed at each quarterly meeting, and the Workgroup's feedback was incorporated into the final subcommittee recommendations, which were compiled into a FOG format and discussed in December 1999 and finalized in February of 2000.

Substantive revisions to the Oil Spill FOG include:

- The Standard Incident Command System organizational chart in the front of the 1996 FOG has been moved to a new Section 2 and combined there with the organizational guide information formerly in Section 9. The organization chart is revised to reflect additional changes described below and is renamed "Example Response Organization."
- The Introduction has been revised to explain the relationship of the FOG with the National Response System and the National Contingency Plan, as well as the role, resources, and authority of the Federal On-Scene Coordinator (FOSC). Language has been added to explain that

the FOG is not a regulatory document. Updated web site addresses are listed for the US Coast Guard and NOAA, with guidance regarding the information available at these sites.

- A new Section 3, “Response Objectives and Strategies,” explains the differences among objectives, strategies, and tactics, and provides examples of each.
- The Multi-Agency Coordination System (MACS) section has been replaced with a new Section 4 titled “Agency/Stakeholder Coordination.” The different roles of the Liaison Officer, the Regional Response Team, Area Committees, and a Multi-Agency Coordination System (MACS) are explained as they apply to coordination of both agency and stakeholder concerns and resources, both before and during a spill response.
- A new Section 5, titled “National/Regional Incident Command” has been added that describes how the US Coast Guard will implement an oil spill version of the Area Command model used for major/multiple incident management within NIIMS ICS.
- Text was added to the Command Section to clarify the difference between an Incident Commander (IC) and Unified Command (UC). A reference to the Joint Information Center (JIC) was added under the Information Officer’s responsibilities. The Liaison Officer’s position description was expanded to include stakeholder coordination. Text was added to the Natural Resource Damage Assessment (NRDA) Representative description, as well as new language referencing Incident Investigations, to indicate that these functions are outside of the ICS structure but must be coordinated with response activities.
- In the Operations Section, text was added to reflect two new positions: a Dispersants Operations Supervisor and an In Situ Burn Operations Supervisor. Related references were added to other position descriptions as necessary. In addition, “Source Control” was added to the Salvage Group Supervisor description to acknowledge the function of source control for situations where the spill source is not a vessel.
- Text was added to the Planning Section to describe the new Environmental Unit Leader position, a Weather Forecast Specialist, a Shoreline Cleanup Specialist, an Historic/Cultural Resources Specialist, and a Human Resource Specialist.
- The Glossary was revised for consistency with other changes as well as to improve consistency with NIIMS ICS. A list of acronyms was added to the Glossary section.
- The Coast Guard has updated the resource typing guidelines for resources commonly deployed to oil spills. The revised version of these guidelines are included in the updated FOG.
- Section 13, “Meetings and Briefings” has been changed to “Incident Action Plan Process and Meetings,” and is re-titled Section 14. The Planning Cycle Guides at the end of each functional section have been replaced with a new Operational Period Planning Cycle graphic in this section. Text describing the Unified Command Objectives Meeting was moved from Special Purpose Meetings and inserted before the Tactics Meeting text. Under Special Purpose Meetings, there is now the *Initial* Unified Command Meeting. All other Special Purpose Meetings remain, except that “Press Conference” is changed to “News Briefing.” Edits were made in this section with regard to meeting attendance and agendas.
- The only revision to the Incident Situation Display Section was the addition of a page titled “Suggested Situation Map Information” which lists types of information that may need to be displayed. The categories include Response Resources, Facilities, Response Sites, and Public Facilities.
- Consistent with the 1996 oil spill FOG, the ICS Forms Index provides an overview of changes to the oil spill forms. The following National Fire Equipment System (NFES) forms have been slightly modified for oil spill response, but either version can be used:

201-OS	Incident Briefing
202-OS	Response Objectives
203-OS	Organization Assignment List
204-OS	Assignment List
205-OS	Incident Radio Communications Plan
206-OS	Medical Plan

207-OS	Organization Chart
209-OS	Incident Status Summary
210-OS	Status Change
213-OS	General Message
214-OS	Unit Log
215-OS	Operational Planning Worksheet
220-OS	Air Operations Summary
221-OS	Demobilization Checkout

- The following optional forms are new for oil spill response and have no NFES equivalent:

204a-OS	Assignment List Attachment
205a-OS	Communications List
211e-OS	Check-in List (Equipment)
211p-OS	Check-in List (People)
214a-OS	Individual Log
230-OS	Daily Meeting Schedule
231-OS	Meeting Summary
232-OS	Resources at Risk Summary
232a-OS	ACP Site Index
	An IAP cover sheet
	An Executive Summary
	A General Plan
	Initial Incident Information Sheet

The process of developing consensus support for revisions to the FOG and ICS Forms was more complex than might be deduced from merely listing the revisions. A discussion of several topics addressed by the FOG Update Workgroup can be found in the report section titled "Discussion of Significant Issues." These topics include the relationship of the FOG to the National Contingency Plan, Area Plans, and Facility and Vessel Response plans; the importance of maintaining one oil spill FOG nationwide; recommendations for training in the use of the FOG; the "shape" of Unified Command; the integration of salvage decision-making into Unified Command; Area Command issues; and the role of a Deputy On-Scene Coordinator. This project report also provides information on the Alaska Incident Management System Guide for Oil and Hazardous Substance Response and the National Response Team and US Coast Guard's efforts to develop a multiple-contingency FOG.

A one-page summary and a Power Point presentation on the FOG Update will be made available to each Workgroup member, along with copies of the final FOG and oil spill forms, for outreach efforts to target constituencies. Please see below for more information on outreach assignments. The US Coast Guard Office of Response will assume responsibility to update the FOG on a three-year cycle, or as needed.

## **FOG Update Project Background and Process**

The National Interagency Incident Management System (NIIMS) version of the Incident Command System (ICS), developed to integrate multiple fire fighting units in a wildland fire response situation, has become the adopted model for oil spill response. ICS was developed in the 1970s for fire response in order to integrate multiple response organizations and reduce confusion during an emergency situation. By standardizing response roles, ICS provides for consistency. As recently as 1994, however, ICS was being used only sporadically for emergency applications other than firefighting, including oil spill response. During one ICS training event in California, representatives from the California Office of Spill Prevention and Response (OSPR) and three US Coast Guard Marine Safety Offices agreed that it would be wise to incorporate the use of NIIMS ICS principles into oil spill response in California. OSPR and the Coast Guard were joined in their efforts by representatives from the oil industry, the Texas General Land Office, local governments, and representatives of the California Department of Forestry (who provided guidance consistent with the NIIMS ICS developed for use in fire response). Their goal was to outline a consistent response approach in an easy-to-reference pocket-size Field Operations Guide (FOG) manual similar to the Firescope FOG.

The first draft of this oil spill FOG was used in the Preparedness for Response Exercise Program (PREP) exercise in Los Angeles in the fall of 1994. It became very popular, and demand for its use generated requirements for training programs and forms. The group known as STORMS – Standard Oil Response Management System – was organized to guide this effort. The STORMS Task Force produced the first official oil spill response-focused ICS Field Operations Guide in 1996, which was published by OSPR and the US Coast Guard. Many federal and state emergency response agencies are now required to use ICS. In addition, the response systems specified in vessel and facility oil spill contingency plans are required by many regulatory agencies to be compatible with NIIMS ICS.

The work of the STORMS Task Force has been so successful that the oil spill FOG has only required “updating” to reflect ongoing field experience as well as emerging response paradigms. Following the 1998 Spill of National Significance (SONS) drill in Valdez, Alaska, US Coast Guard CAPT Larry Hereth of the Response Office at US Coast Guard Headquarters and Task Force Members Michele Brown (Commissioner, Alaska Department of Environmental Conservation) and Pete Bontadelli (Administrator, OSPR) agreed that the States/BC Oil Spill Task Force should facilitate a national workgroup focused on updating the 1996 Oil Spill Field Operations Guide (FOG). Similar “update” efforts had already begun. The Alaska Department of Environmental Conservation (ADEC) began an Alaska FOG update process in cooperation with Alaska industry and response organizations in 1998. In addition, the US Coast Guard had adopted NIIMS ICS for all emergencies and established a Response Management Coordination Council to coordinate uniform implementation and develop a generic ICS FOG for multiple contingencies, adding annexes for natural disasters, terrorism, and hazardous material and oil spill incidents.

By initiating and participating in the States/BC Oil Spill Task Force FOG Update Project, ADEC and the US Coast Guard helped align these efforts with a consistent outcome. The Task Force convened a FOG Update Project Workgroup in December 1998. Rob Floerke, Deputy Administrator for the Office of Spill Prevention and Response in the California Department of Fish and Game, and a member of the earlier STORMS Task Force, chaired the project workgroup; Joe Pecsí of OSPR, who was also a STORMS alumnus, facilitated the Workgroup. The workgroup included representatives of the other Oil Spill Task Force state agencies as well as the Texas General Land Office and the Florida Department of Environmental Protection. Other interested states around the US were kept “in the loop” electronically.

The National Strike Force Coordination Center, the Response Office in Coast Guard Headquarters, and the West Coast Districts 11 and 13 represented the US Coast Guard. Other US Federal agencies

represented on the Workgroup included the Minerals Management Service, the National Oceanic and Atmospheric Administration, and the Environmental Protection Agency. The Canadian Coast Guard and the US Fish and Wildlife Service sent observers to the first meeting and remained on the mailing/email list in an observer capacity. The Office of Pipeline Safety participated by email.

Oil industry representatives on the Workgroup included those from ARCO, the American Waterways Operators, BP Exploration, Chevron, Equiva Services, Exxon, Mobil, SeaRiver Maritime, Inc., Tesoro, and Unocal. In addition, representatives from the National Wildfire Coordinating Group participated as advisors on NIIMS ICS protocols. For a complete list of the members of the FOG Update Project Workgroup, please see Attachment A.

There was a consensus within the Project Workgroup at their first meeting for maintaining a standardized oil spill FOG nationwide. There was considerable discussion regarding whether the oil spill FOG should follow NIIMS ICS, which is a comprehensive system with many facets, including forms and training. The workgroup ultimately agreed to base the FOG on NIIMS ICS principles, but did not commit to use of the entire NIIMS ICS system. Any application of NIIMS ICS principles to oil spill response must address a major difference between spill response and firefighting: the role of a Responsible Party (RP). An oil spill response is most likely to include responders from the regulated industry organization responsible for the spill as well as state and Federal spill response agencies. This dynamic tension between the regulators and the regulated means that the standardization of response roles inherent in ICS is even more critical to facilitating a rapid and effective response.

All the participants at the first FOG Update project workgroup meeting were asked to brainstorm what had worked well with the oil spill FOG and what changes - if any - they would recommend for further discussion. Six priority themes were drawn from these brainstormed issues; during discussion of these priority themes, the following points and decisions were made:

1. The Workgroup should concentrate its efforts in revising the Oil Spill FOG. The concept of a generic, all hazards FOG was only of limited interest to most attendees, at least as a priority need.
2. The Workgroup should review the NIIMS ICS positions for oil spill check list items and develop ICS/Oil positions that are not covered in the existing FOG; examples included the environmental unit, legal, and human resources. The Workgroup agreed, and a Positions subcommittee was established to address this issue.
3. Resource typing standards were generally acknowledged as useful. However, this was not deemed a priority for the assembled group.
4. Various spill response topics were not addressed in the 1996 FOG, so new text was needed to address the Joint Information Center (JIC), Area Command, and the need for an information flow diagram, for example. A Topics subcommittee was established to develop recommendations to the full Workgroup.
5. The Workgroup agreed that establishing response qualifications is an important step in improving the professionalism of oil spill responders, but there was consensus that this was a bigger issue than this group wished to address under the FOG Update project.<sup>1</sup>
6. The Workgroup agreed that the FOG forms and processes should be simplified. A subcommittee was established to review oil spill response forms and recommend changes based on the need for consistency among users as well as flexibility in the field. LCDR KEN Barton of NOAA Hazmat chaired this FORMS subcommittee.

The full FOG Update Project Workgroup met for a total of six two-day sessions: in December 1998 in Alameda, California; in March 1999 in Seattle, Washington; in June 1999 in Alameda, CA; in

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<sup>1</sup> Recommendations for spill responder knowledge and training are outlined in Appendix C of the Alaska Incident Management System Guide. See [www.akrrt.org/aim](http://www.akrrt.org/aim)

September, 1999 in Bellevue, WA; in December 1999 in Sacramento, CA; and in February 2000 in San Diego, CA. Most subcommittee sessions were also held by conference call between workgroup meetings. Their progress was reviewed and discussed at each quarterly Workgroup meeting and feedback incorporated into final subcommittee recommendations compiled into a FOG format and discussed in December 1999 and reviewed again in February of 2000.

The Positions Subcommittee membership included CDR Jim Morris of NOAA; Tracy Taylor of the US Coast Guard; Jack Wylie of the Oregon Department of Environmental Quality; Craig Ogawa of the Minerals Management Service; Craig Rassinier of SeaRiver Maritime; Chris Wurzell of the California Department of Forestry; and Terry Joslin of BlueWater Consultants. As noted above, the Positions Subcommittee was initially chaired by Barry McFarland of ARCO Marine, Inc., and subsequently by John Hughes of the Chevron Corporation.

The Topics Subcommittee membership included Ed Thompson of BP Exploration; Phil McCrudden of the Alaska Pacific Response Group; George Jardim of the Chevron Corporation; John Butler of the Washington Department of Ecology; and Donn Zuroski and Steve Calanog for EPA Region 9. The subcommittee was chaired by LCDR Anthony Lloyd of the US Coast Guard National Strike Force Coordination Center.

### **Product: Updates to the Oil Spill Field Operations Guide (FOG)**

The revised FOG layout includes tables of contents in each section, modeled on the Firescope FOG; this makes position description references more efficient. In addition, the entire document was edited for consistency. The substantive revisions to the Oil Spill FOG, as agreed to by the FOG Update Project Workgroup, are outlined below:

- The response objectives previously listed on the inside back cover have been moved to the inside of the front cover page and are listed as “typical” response objectives. A statement underscoring the paramount importance of safety heads the page.
- The Standard Incident Command System organizational chart in the front of the 1996 FOG has been moved to a new Section 2 and combined there with the organizational guide information formerly in Section 9. The organizational chart is revised to reflect additional changes described below and is titled “Example Response Organization.”
- The Introduction section has been revised as follows:
  - Text has been added to explain the relationship of the FOG with the National Response System and the National Contingency Plan, as well as the role, resources, and authority of the Federal On-Scene Coordinator (FOSC);
  - Text has been added to explain that the FOG is not a regulatory document, but rather provides generic guidance that must be adapted to each specific response situation; and
  - Updated web site addresses are listed for the US Coast Guard and NOAA, with guidance regarding information available at these sites.
- A new Section 3 is titled “Response Objectives and Strategies.” It explains the differences among objectives, strategies, and tactics, and provides examples.
- The Multi-Agency Coordination System (MACS) section has been replaced with a new Section 4 titled “Agency/Stakeholder Coordination.” The different roles of the Liaison Officer, the Regional Response Team, Area Committees, and a Multi-Agency Coordination System (MACS) are explained as they apply to coordination of both agency and stakeholder concerns and resources, both before and during a spill response. Text has also been added to underscore the importance of agency and stakeholder coordination, with guidance on how to address stakeholder concerns.

- A new Section 5 has been added, titled “National/Regional Incident Command.” This section describes how the US Coast Guard will implement an oil spill version of the area command model used for major/multiple incident management within NIIMS ICS. This section provides guidance to a USCG FOSC regarding strategic coordination during a Spill of National Significance, consistent with the authorities outlined in the National Contingency Plan. As noted in the text, “Based on the need for overall Federal coordination, a National or Regional Incident Command (NIC/RIC) organization may be activated at the discretion of the controlling Federal authority.” The section further explains that “... the NIC/RIC will work with the RP (*responsible party*) and other agencies (*Federal, state, or local*) to agree on an organizational structure that best ensures effective strategic coordination.” A NIC/RIC organizational chart is provided at the end of the section.
- The only change to the Common Responsibilities section was to add the following statement: “Ensure continuity using in/out briefings.”
- The following revisions were made to the Command Section:
  - Text was added to clarify the difference between an Incident Commander (IC) and Unified Command (UC);
  - Text was added under the Information Officer’s responsibilities to reference a Joint Information Center (JIC);
  - The Liaison Officer’s position description was expanded to include stakeholder coordination; and
  - Text was added to the Natural Resource Damage Assessment (NRDA) Representative description, as well as new language referencing Incident Investigations, to indicate that these functions are separate from, but concurrent with, spill response. These are activities outside of the ICS structure that must be coordinated with response activities. Initial coordination through the Liaison Officer is recommended, but necessary coordination with the Environmental Unit Leader (EUL), the Wildlife Branch, the NOAA Scientific Support coordinator (SSC), and Finance/Administration is acknowledged.
- Revisions to the Operations Section:
  - Text was added to reflect two new positions: a Dispersants Operations Supervisor and an In Situ Burn Operations Supervisor. Related references were added to other position descriptions, as necessary; and
  - The words “Source Control” were added to the Salvage Group Supervisor description to acknowledge the function of source control for situations where the spill source is not a vessel.
- Revisions to the Planning Section:
  - Text was added to describe the new position of an Environmental Unit Leader, a Response Technologies Specialist (note that these are no longer considered *Alternative* Response Technologies), a Weather Forecast Specialist, a Shoreline Cleanup Specialist, an Historic/Cultural Resources Specialist, and a Human Resource Specialist (this position is described here with other specialists, although the position is normally assigned to the Finance/Administration section).
- The Glossary was revised for consistency with other changes, as well as to improve consistency with NIIMS ICS. A list of acronyms was added to the Glossary section.

- The FOG Update Project Workgroup approved incorporating the Resource Type List developed by the US Coast Guard R&D center into the Oil Spill Field Operations Guide to replace the Resource Typing Section (11) in the 1996 Oil Spill FOG.<sup>2</sup>
- Section 13, “Meetings and Briefings” has been changed to “Incident Action Plan Process and Meetings,” and is now Section 14.
  - The Planning Cycle Guides at the end of each functional section have been replaced with a new Operational Period Planning Cycle graphic in this section.
  - Text describing the Unified Command Objectives Meeting was moved from Special Purpose Meetings and inserted before the Tactics Meeting text. Under Special Purpose Meetings, there is now the *Initial* Unified Command Meeting. All other Special Purpose Meetings remain, except that “Press Conference” is changed to “News Briefing.”
  - Edits were made in this section with regard to meeting attendance and agendas.
- Consistent with the 1996 oil spill FOG, the Incident Command System Forms Index section provides an overview of changes to the oil spill forms. Please see the discussion below.
- The only revision to the Incident Situation Display Section was to add a page titled “Suggested Situation Map Information” which lists types of information that may need to be displayed. The categories include Response Resources, Facilities, Response Sites, and Public Facilities.

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<sup>2</sup> The USCG R&D Center developed a Marine Spill Response Resource “Type” List. It is anticipated that the Resource Type List will be used to standardize and upgrade the resource ordering and management process during USCG-directed responses; used to organize the items supplied to the USCG under future Basic Ordering Agreements (BOA’s); and used to organize the response resource data maintained within the NSFCC Response Resource Inventory (RRI) Data Base. The project initially involved an informal review group of 13 representatives of key government agency and commercial organizations. Their work was presented for comment at regional meetings in Hampton Roads, San Francisco, and Galveston during December 1999 and January 2000. A total of 55 members of local response communities participated in these regional meetings. The comments received at the three regional meetings, from the informal review group and from other individuals who reviewed the Preliminary Type List were analyzed and incorporated as appropriate into a refined Interim Type List. The Interim Type List was then presented for review and comment to SCAA and APICOM during March of 2000. Overall, 50 individuals reviewed the Interim Type List. The comments received at the three national level meetings, from the informal review group and from other individuals who reviewed the Interim Type List were analyzed and incorporated as appropriate into a Final Type List. This list was completed and submitted on 5 June 2000.

## **Product: Revision to the Oil Spill ICS Forms**

As noted above, a FORMS Subcommittee was established at the first FOG Update Project Workgroup meeting and was chaired by LCDR Ken Barton of NOAA Hazmat. Members included Elin Storey of the Washington Department of Ecology; Jim Clow of Equiva Services; Dave Pearce of the Exxon Corporation; Ralph Alworth of the California Department of Forestry; CDR Kristy Plourde, US Coast Guard Marine Safety Office San Francisco; John Kwietniak of Tesoro; Larry Iwamoto of the Alaska Department of Environmental Conservation; LCDR Vickie Huyck of the US Coast Guard Office of Response; and Kim McCleneghan of the California Office of Spill Prevention and Response. John Murphy of Genwest served as a NOAA contractor to the subcommittee.

This subcommittee labored through numerous revisions, based on the feedback of the full Workgroup, to refine the oil spill ICS forms with the goal of making them more user-friendly. They reviewed forms developed by various industry groups and agencies and captured the best aspects of them all, with the goal of producing forms which would be consistently used by all spill responders.

The major revisions to the ICS Oil Spill Forms are summarized below. Unless noted, the revisions listed below are changes from the original NIIMS forms (versus the STORMS forms developed for the 1996 red FOG and also found in NOAA's Forms Database dated 1998). Minor formatting changes to make all the forms consistent are NOT discussed here.

### **201-OS Incident Briefing**

**Purpose:** This form provides the Unified Command with the basic information regarding the incident situation and the resources allocated to the incident. It is also a permanent record of the initial incident response.

**Revisions:**

1. Added "Initial Incident Objectives" field and "Time" column in the Summary of Current Actions area on page 2.
2. Customized the organization chart on page 3 to reflect a Unified Command structure vs. Incident Command and added the Finance Section box.
3. Added "Time Ordered" column on page 4.
4. The "Notes" Column on the 4th page is more generic but instructs user to identify location/assignment/status here.

### **202-OS Response Objectives**

**Purpose:** This form describes the basic incident strategy, control objectives, and provides weather, tide, and current information, and safety considerations for use during the next operational period. The Attachments List at the bottom of the form also serves as a table of contents for the Incident Action Plan.

**Revisions:**

1. Added an area for Objectives for Specified Operational Period.
2. Added reference to location of Complete Site Safety Plan (done throughout forms wherever safety is mentioned).
3. Weather was changed to a mandatory attachment and an attachment for Tides/Currents was added and fields were added for Time of Sunrise and Sunset.
4. Added Resources at Risk(ICS 232-OS) to the list of attachments at the bottom of the page.

### **203-OS Organization Assignment List**

**Purpose:** This form provides ICS personnel with information on the units that are currently activated and the names of personnel staffing each position/unit. It is used to complete the Incident Organization Chart (ICS 207-OS) which is posted on the Incident Command Post display.

**Revisions:** These reflect the addition of the Unified Command positions the addition of an Environmental Unit within the Planning Section.

### **204-OS Assignment List**

**Purpose:** The Assignment List informs Division and Group supervisors of incident assignments. Once the assignments are agreed upon by the Unified Command and General Staff, the assignment information is given to the appropriate Divisions and Groups.

**Revisions:**

1. Removed Air Tactical Group from Operations Personnel Section, Item 5.
2. Added Affiliation and Contact #'s for Item 5.
3. Added Contact #'s for Item 6.
4. Removed EMT, Trans. Needed, Dropoff Time, Pickup Time and replaced with Notes/Remarks section.
5. Added a box for each line in Item 6 to indicate when a 204a-OS will be used.
6. Reworked the communications section, Item 9, to include information on communications "networks" from form 205-OS and more generic information (e.g. cell phones, pagers, etc.) when not using more detailed communications.

### **204a-OS Assignment List Attachment**

**Purpose:** The Assignment List Attachment informs field personnel of specific incident assignment information. Once the Unified Command and General Staff agree to the Group / Division assignments, the specific assignment information is given to the appropriate Team or Task Force Leaders. NOTE: This form is an optional attachment, which can be used in conjunction with the Assignment List, ICS form 204-OS. The ICS form 204-OS is used to give assignments to Divisions and Groups; the ICS form 204a-OS provides more specific assignment information, when needed. If the box at the end of a line is marked, then there will be an ICS form 204a-OS for each Strike Team / Task Force / Resource Identifier listed in Item 6 of ICS form 204-OS. The need for an ICS form 204a-OS is determined by the Planning and Operations Section Chiefs during the development of the Operational Planning Worksheet (ICS form 215-OS).

**Revisions:** None. This is a new form.

### **205-OS Incident Radio Communications**

**Purpose:** The Incident Radio Communications Plan is a summary of information obtained from the Radio Requirement Worksheet (ICS Form 216) and the Radio Frequency Assignment Worksheet (ICS Form 217). Information from the Radio Communications Plan on radio assignments is normally noted on the appropriate Assignment List (ICS Form 204).

**Revisions:** Minor formatting changes for consistency only.

### **205a-OS Communications List**

**Purpose:** This form records methods of contact for personnel on-scene. NOTE: This optional form is used in conjunction with the Incident Radio Communications Plan, ICS form 205-OS. Whereas the ICS form 205-OS is used to provide information on all radio frequencies down to the Division/Group level, the Communications List, ICS form 205a-OS, lists methods of contact for personnel assigned to the incident (radio frequencies, phone numbers, pager numbers, etc.), and functions as an incident directory.

**Revisions:** None. This is a new form. It was developed to provide a contact list for the response organization taking into account that at most spills cellular phones and pagers are the primary method of communication.

**206-OS Medical Plan**

**Purpose:** This form provides information on incident medical aid stations, transportation services, hospitals, and medical emergency procedures.

**Revisions:**

- 1. Simplified form by having one ambulance section.
- 2. Changed Phone columns to Contact # columns for consistency.
- 3. Provided more room for Emergency Procedures (Item 6).

**207-OS Incident Organization Chart (NOT INCLUDED FOR REVIEW AT THIS TIME)**

**Purpose:** The Incident Organization Chart is used to indicate what ICS organizational elements are currently activated and the names of personnel staffing each element. The chart is an example of the kind of Organizational Chart used in the ICS. An actual organization will be event-specific. Not all positions need to be filled. The size of the organization is dependent on the magnitude of the incident and can be expanded or contracted as necessary. Personnel responsible for managing organizational positions are listed in each box as appropriate.

**Revisions:** Specific changes include the addition of: 1) the Environmental Unit under the Planning Section 2) inclusion of Recovery, Emergency Response and Wildlife Branches within Operations and 3) Investigators, NRDA and Agency representatives working with the Liaison Officer.

**209-OS Status Summary**

**Purpose:** The Status Summary (1) is used by Situation Unit personnel for posting information on Status Boards; (2) is duplicated and provided to Command Staff members, giving them basic information for planning for the next operational period; (3) provides information to the Information Officer for preparing news media releases, and; (4) summarizes incident information for local and off-site coordination centers.

**Revisions:** This form has been completely revised from the NIIMS form to reflect the realities of spill response. The changes listed below indicate differences between the STORMS (Red FOG and NOAA Forms Database) ICS 209 and the ICS 209-OS. The Instructions for this form will help to highlight the changes made and why.

- 1. Positions noted in brackets [] on the first line of each Item indicate which ICS Section to go to for the required information.
- 2. In Item 8, columns were added to identify resources a)which are "Ordered" and b)modified "Available" to "Available/Staged". Past spill experience indicates this more accurately highlights the kind of information desired by the UC and PIO.
- 3. In Item 8, all equipment resources are now list in this one Item (removed the distinction between Onshore and Offshore resources) and similar equipment was grouped together along with providing more space for inclusion of additional equipment.
- 4. Item 9 was modified to differentiate between field and command post personnel. "Volunteers" were also added to the Personnel Resource Section.
- 5. In Item 6 (Wildlife Impacts), the number of threatened/endangered species in each category can now be delineated by parentheses. For example:

	Captured	Cleaned	Released	DOA	Euth.	Other
Birds	200(23)	300(2)	25(6)	125(10)	20(0)	0
Mammals	25(0)	5(0)	0	10(0)	0	0
Reptiles	0	0	0	0	0	0

values in () represent subtotal that are T/E.

6. Item 2 now refers to the period covered by this report and does not relate to Operational Period since this form may be filled out at different times during the day AND for a specific period. The time that the report was completed was also added.

7. In Items 3 and 7, estimates are figured for "Since Last Report" instead of "Last 24 Hours". This correlates with the reality that this form may be filled out at different times during the day in order to reflect the most recent information.

8. In Item 3, the first line of the Mass Balance/Oil Budget has been corrected to “Recovered Oil” instead of “Recovered Liquids”. The value for the Recovered Oil Total in Item 3 should equal the value entered into the first field in the Recovered column in Item 4.

### **210-OS Status Change**

**Purpose:** This form is used by the incident Communications Center Manager to record status change information received on resources assigned to the incident.

**Revisions:** This form can be also be a card. For consistency a form was created although the elements of the form can be used in a card format.

1. Item 4 (New Status) is changed to reflect changes in Section 8 of ICS 209-OS (available/staged, assigned, and out of service).
2. Item 5 “From/To” does not list specific location within the ICS. This can be written in allowing more flexibility.

### **211 Check-in List**

**Purpose:** Personnel and equipment arriving at the incident can be checked in at various incident locations. Check-in consists of reporting specific information that is recorded on the form.

**Revisions:** This is the original NIIMS form. No change was made to this form.

### **211P-OS Check-in List - Personnel**

**Purpose:** Personnel arriving at the incident can be checked in at various incident locations. Check-in consists of reporting specific information that is recorded on the form.

**Revisions:** To make this new form, the ICS form 211 was changed significantly to customize it for checking in personnel and to better reflect the realities of spill response. A separate form (ICS form 211E-OS) was developed to check-in equipment resources.

### **211E-OS Check-in List - Equipment**

**Purpose:** Equipment arriving at the incident can check in at various incident locations. Check-in consists of reporting specific information that is recorded on the form.

**Revisions:** To make this new form, the ICS form 211 was changed significantly to customize it for checking in equipment at multiple locations. A separate form (ICS form 211P-OS) was developed to check-in response personnel.

### **213-OS General**

**Purpose:** The General Message is used by:

1. Incident personnel to record incoming messages which cannot be orally transmitted to the intended recipients;
2. Command Post and other incident personnel to transmit messages to the Incident Communications Center for transmission via radio or telephone to the addressee;
3. Incident personnel to send any message or notification to incident personnel which requires hardcopy delivery.
4. Incident personnel to place resource orders.

**Revisions:** This form is identical to the NIIMS form in content. It is merely redesigned for electronic purposes. Either form can be used.

### **214-OS Unit Log**

**Purpose:** The Unit Log records details of unit activity, including strike team activity. These logs provide the basic reference from which to extract information for inclusion in any after-action report. **NOTE:** ICS Form 214-OS logs activities for an entire unit, whereas 214a-OS is designed for individuals.

**Revisions:** This form is identical to the NIIMS form in content. It is merely redesigned for electronic purposes. Either form can be used.

#### **214a-OS Individual Log**

**Purpose:** This optional form records details of each individual's activities. These logs provide a basic reference from which to extract information for inclusion in any after-action report.

**NOTE:** ICS Form 214a-OS is designed for individuals, whereas 214-OS is designed to log activities for an entire unit.

**Revisions:** None. This is a new form. This reflects the reality that during spill responses the second page of ICS 214 is often used as an individual log.

#### **215-OS Operational Planning Worksheet**

**Preparation.** This form communicates to the Resource Unit the resources needed as a result of decisions made during the Tactics and Planning meetings. The Worksheet is used by the Resource Unit to complete the Assignment List (ICS form 204-OS) and by the Logistics Section Chief for ordering resources. The worksheet may also be used by the Resource Unit Leader to complete the Assignment List Attachment(s) (ICS form 204a-OS), if the Operations and

Planning Section Chiefs deem it necessary. This form is initiated at the Tactics Meeting and modified and finalized at the Planning Meeting. For ease of use, the form should be enlarged to poster size. This form is principally crafted by the Operations and Planning Section Chiefs. When decisions are reached, the information should be recorded on the form. Use additional sheets as needed.

**Revisions:**

1. In Item 5 "Resource by Type" is changed to "Resource/Equipment" to reflect the reality that resource typing is generally not used in oil spills at this time.
2. A "Notes/Remarks" section was added for additional special information on a particular work assignment.
3. A box was added to each line to indicate whether an ICS Form 204a-OS is needed to complete the process from this worksheet to the 204/204a forms.
4. In Items 10, 11, and 12 the reference to "Single Resource/ Strike Team" was removed to simplify the form and to reflect the reality of resource tracking at a spill response.

#### **216 Radio Requirements Worksheet**

**Purpose:** This form is used to develop the total number of personal radios required for each Division/Group and Branch. It provides a list of all units assigned to each Division, and thus depicts the total incident radio needs.

**Revisions:** This is the original NIIMS form. No change was made to this form.

#### **217 Radio Frequency Assignment Worksheet**

**Purpose:** This form is used by the Radio Communications Unit Leader to assist in determining frequency allocations.

**Revisions:** This is the original NIIMS form. No change was made to this form.

#### **218 Support Vehicle Inventory**

**Purpose:** This form provides an inventory of all transportation and support vehicles assigned to the incident. The information is used by the Ground Support Unit to maintain a record of the types and locations of vehicles on the incident. The Resources Unit uses the information to initiate and maintained status/resources information on these resources.

**Revisions:** This is the original NIIMS form. No change was made to this form.

## 219 T-cards

**Purpose:** These cards are used by the Resource Unit to record status and location information on resources, transportation, and support vehicles and personnel. The T-cards provide a visual display of the status and location of resources assigned to the incident.

**Revisions:** These are the original NIIMS forms. No change was made to these forms.

## 220-OS Air Operations Summary

**Purpose:** This form provides air ops. units with the number, type, location, and specific assignment of helicopters and fixed-wing aircraft.

**Revisions:** The STORMS (from the Red FOG and NOAA Forms Database) form was adopted for use. This version is only slightly modified from the version of the NIIMS form that was in use at that time the original STORMS forms were developed.

## 221-OS Demobilization Checkout

**Purpose:** This form provides the Planning Section with information on resource releases from the incident.

**Revisions:** The following sections were deleted: Transportation Type, Manifest (Y/N), Destination, Area/Agency/Region Notified, and Performance Rating. The form was also simplified to include only pertinent information used in spill responses.

**SPECIAL NOTE:** The following forms were new forms created in the STORMS (Red FOG) process. There are no associated NIIMS forms. All revisions apply to the STORMS forms (those found in the NOAA Forms Database).

## 230-OS Daily Meeting Schedule

**Purpose:** The Daily Meeting Schedule records information about the daily scheduled meeting activities.

**Revisions:** Modified to include typical meetings identified in the FOG, including purpose and attendees. Added Unified Command Objectives Meeting to review/identify objectives for the next Operational Period.

## 231-OS Meeting Summary

**Purpose:** The Meeting Summary provides more detailed information concerning the attendees and notes from a particular meeting.

**Revisions:** Changed from "Meeting Description" to "Meeting Summary". The new form satisfies the need for a summary of decisions and actions. In Item 2 Date/Time of meeting were added in place of Operational Period.

## 232-OS Resources at Risk Summary

**Purpose:** The Resources at Risk Summary provides information about sites in the incident area which are sensitive due to environmental, archaeo-cultural, or socio-economic resources at risk, and identifies incident-specific priorities and issues.

**Revisions:**

1. The format has been modified for consistency.
2. More lines were added in the narrative.
3. "Site" was changed to "Site Name and/or Physical Location".
4. "Location" was changed to "Site Issues".

## **232a-OS ACP Site Index**

**Purpose:** This form is posted next to the Situation Map, providing a key to the ACP/GRP sites shown on the map. NOTE: This optional form is designed to be a key to the site numbers or site names shown on the Situation Map. The information on priorities for environmentally-sensitive areas and archaeo-cultural and socio-economic issues from the ICS form 232-OS may be transferred to ICS form 232a-OS, which provides more information on the Area Contingency Plan (ACP) or Geographic Response Plan (GRP) site numbers or names shown on the Situation Map.

**Revisions:** This is a not a new form. It is the newly numbered and renamed Sensitive Site/Response Actions form developed in the STORMS process. The form has some formatting changes and more space has been provided for each row.

## **Executive Summary**

**Purpose:** The Executive Summary communicates significant response issues during the current operational period, summarizing the daily activities for all sections in a brief format to Senior Managers, Administrators, Senior Agency Staff, and Civic Leaders.

**Revisions:** This is the same form as the STORMS form.

## **General Plan**

**Purpose:** The General Plan form displays the progress and planned start and end dates for various spill response activities. Some standard activities have been listed on the form and blank lines are provided at the bottom of the form for planning and tracking additional incident-specific activities.

**Revisions:**

1. Modified from portrait to landscape.
2. Numbers for task were removed.
3. Took away lined columns and replaced them with shaded columns.

## **Incident Action Plan (IAP) Cover Sheet**

**Revisions:** Two options are provided; one with checkboxes for included items and one with blank space for incident picture/symbol/map, etc. This is a non-NIIMS form.

## **Initial Incident Information**

**Revisions:** This is a non-NIIMS form and there are only a few formatting changes from the original STORMS form.

## Discussion of Significant Issues

The final revisions to the Oil Spill FOG and the ICS forms that are summarized above do not capture the comprehensive nature of the discussions held by the Project Workgroup leading to these revisions. Nor did the Workgroup consider the FOG itself - which is intended to be a pocket-size field guide - to be the appropriate place to summarize these discussions. Accordingly, summary notes on these topics and issues are provided below:

### The relationship of the FOG to the NCP, ACPs, FRPs, and VRPs

New text was added to the Introduction Section of the FOG regarding the relationship of the FOG to the National Contingency Plan (NCP). However, more needs to be stated on the relationship of the FOG to the NCP as well as to other documents such as Area Contingency Plans (ACPs) and vessel and facility contingency plans (VRPs and FRPs).

The National Contingency Plan describes the spill response authorities of the US Coast Guard and the Environmental Protection Agency and their relationships to state, local and trustee agencies as well as to the regulated industry during an oil spill response. The NCP (40 CFR Part 300) as amended pursuant to the Oil Pollution Act of 1990 outlines the basic US Federal authorities which govern response to releases of oil and hazardous materials (Subpart A), responsibility and organization for response (Subpart B), planning and preparedness (Subpart C), and the operational response phases for oil removal (Subpart D). As stated in Section 300.105 (b), "Three fundamental kinds of activities are performed pursuant to the NCP: (1) Preparedness, planning, and coordination for response... (2) Notification and communications; and (3) Response operations at the scene of a discharge or release." Part of the preparedness, planning, and coordination occurs through the Area Planning process outlined in Section 300.205. It also takes place through the preparation and approval process for vessel and facility response plans as required by OPA 90 (see Section 300.211). These FRPs and VRPs are required to be consistent with both Area Plans and the National Contingency Plan.

Section 300.105, part (d), states that "The basic framework for the response management structure is a system (e.g., a Unified Command system) that brings together the functions of the Federal Government, the state government, and the responsible party to achieve an effective and efficient response where the OSC maintains authority." While this language does not specifically cite use of Incident Command System concepts, NIIMS ICS, which provides for a response structure in support of Unified Command as well as a single Incident Commander, has become the response organization standard within both Federal and state agencies with authority for spill response. In addition, US Coast Guard vessel response plan regulations require a description of a plan holder's response organization structure that can be fulfilled by citing NIIMS ICS (33 CFR Part 155, Section 1035 (d)(4) for vessels and 33 CFR Part 154, Section 1035 (b)(3)(iii) for facilities.

For Facility Response Plans (FRP) for those oil facilities located in the inland area, the Environmental Protection Agency has Oil Spill Response Plan regulations located at 40 CFR Part 112.20. These regulations require planholders to describe their spill management team and organization. Although it is not specified, these requirements can be fulfilled by citing NIIMS ICS.

For Facility Response Plans (FRP) for those oil facilities located seaward of the coastline, the Minerals Management Service has Oil Spill Response Plan regulations located at 30 CFR Part 254, Section 23. These regulations require planholders to describe their spill management team and organization. Although it is not specified, these requirements can be fulfilled by citing NIIMS ICS.

EPA was the National Response Team member agency which drafted and proposed the Integrated Contingency Plan (ICP) Guidance (Federal Register Notice, Vol. 61, No. 109, Wednesday June 5, 1996). These guidelines were subsequently developed through a cooperative effort among numerous

RRT agencies, including MMS, and use the NIIMS ICS structure and format for the sample core plan and annexes.

Within this context, the Oil Spill Field Operations Guide (FOG) is intended to be a NIIMS ICS reference during a spill response or exercise. It is to be used as guidance, and as such, is consistent with the National Response System outlined in the NCP. The FOG is not required by regulation, however, as are the NCP, Area Plans, and vessel and facility response plans.

#### The Importance of Maintaining and Using one nationwide FOG

As noted in the Project Background section above, the Workgroup members agreed at their first meeting that it was desirable to maintain one oil spill FOG nationwide. The ICS structure described in the FOG is generic and is intended to be guidance only. The point of using a common organizational paradigm for emergency response is to reduce confusion during the response, thus promoting more efficient and effective action to limit the consequences of a release of oil or hazardous material. Area-specific FOGs would limit the standardization function of the FOG.

Area-specific information regarding protection of sensitive sites, the relationships between authorities, and available resources should be captured in an Area Plan or other area-specific document, rather than the FOG. The Area Contingency Planning process is vital in identifying regional variations in response techniques/policies and roles.

In addition, Responsible Parties (RPs) and Oil Spill Response Organizations (OSROs) are encouraged to use and train with the oil spill FOG and ICS forms rather than customizing them. Both the FOG and the oil spill forms are intended to remain generic, flexible, and adaptive to the needs of each actual response.

#### Training Recommendations

The FOG Update Project Workgroup recommends that ICS training for oil spill responders representing both government (federal, state, local, and tribal) and the private sector (Oil Spill Response Organizations and industry response teams) should emphasize that the FOG is a guidance document intended to be flexible in nature. It is not regulation and need not be followed to the letter if it does not fit the specific nature of a spill response or exercise event, or if the RP has a compatible system.

The Workgroup further recommends that ICS training should emphasize the difference between the Multiple Agency Coordination System (MACS) paradigm and the need to coordinate with stakeholders affected by a spill event. The MACS is intended to provide coordination for government agencies authorized to bring resources to a response. Stakeholders affected by an event also need a mechanism which allows them to give and receive both information and advice regarding the response, but the Workgroup feels that this is better done through the Liaison Officer. Use of a MACS for stakeholder coordination is inconsistent with its intent in the NIIMS paradigm. Please reference Section 4 of the revised FOG.

#### The Shape of Unified Command

After much discussion and debate, the Workgroup agreed to maintain the triangle shape for Unified Command, as found in the organizational charts below. Under the National Contingency Plan, Unified Command typically consists of the Federal On-Scene Coordinator (FOSC), the State OSC, and the Incident Commander of the Responsible Party (RP). Figure 1a in the NCP uses the Unified Command triangle with a footnote next to the State representative including a parenthetical statement underneath noting "Unified Command Structure as developed by the Area Committee." Similar text is reflected in the NRT ICS/UC Technical Document.

However, the National Response Team (NRT) Response Committee is working on a new NRT ICS/UC briefing. The concepts in this new briefing will be reflected in future revisions to the ICS/UC Technical Document and, eventually, the NCP. That new briefing specifically notes the "evolution" from the UC triangle to a circle. One of the reasons the NRT is considering this change is to respond to concerns raised by local governments that the triangle with a footnote did not adequately reflect either the NIIMS Unified Command principles or actual experience during incidents. The triangle implies a three-way membership that may not be needed or may simply be incorrect depending upon the circumstances. The NRT Response Committee believes that the circle better reflects the NIIMS principle that involvement in Unified Command is neither arbitrarily established in advance, nor limited to a certain number of organizations. Recognition that the local government (or others) may be rightfully entitled to be part of the Unified Command - based on jurisdiction and responsibility - is appropriate and better depicted graphically by a circle than a triangle, they believe.

The Workgroup preferred to adhere to the triangle for this iteration of the FOG, in part because a final decision on this issue had not yet been made by the NRT. The Workgroup added the phrase *Unified Command may include other representatives* to the graphic in the Command section to indicate that membership in the UC will be determined by the specifics of the incident, planning discussions held prior to a response, or decisions made during the initial meeting of the UC. The Workgroup encourages Area Committees and state emergency planning bodies to work with local governments, industry stakeholders, and other state and Federal agencies to identify UC membership in advance of an emergency response. Such prior arrangements can be instituted through Area Plans and/or Memorandums of Agreement.

#### The Integration of Salvage Decision-making into Unified Command

Concerns were raised after the 1999 response to the *New Carissa* oil spill on the Oregon Coast regarding the integration of salvage experts into the Unified Command/ICS process. CAPT Mike Hall, the FOSC for that response, felt that the advice from the salvage experts working for the RP was not always made available to the SOSC and FOSC. The Workgroup reviewed the role of the Salvage Group Supervisor (now titled "Salvage/Source Control Group Supervisor") as described in the FOG and determined that it was adequate to address this issue.

#### NIC/RIC and Area Command issues

This is the only section of the revised Oil Spill FOG which does not represent full consensus support of the FOG Update Project Workgroup membership. The Alaska Department of Environmental Conservation (ADEC) objects to the inclusion of this section in the FOG rather than the more generic language on Area Command which is in the Firescope FOG. Because ADEC raised their objections after the last meeting, the full Workgroup had to process the issues by conference calls and email. The eventual outcome of this abridged process was a plurality vote to keep the NIC/RIC section as drafted, but it was not a consensus among the members. A summary of the key issues follows:

Following BP's Spill of National Significance (SONS) Drill in Alaska in September 1998, one recommendation identified in the BP SONS Drill Final Report was to revise the US Coast Guard Commandant Instruction regarding SONS. ADEC understood that the SONS was to be re-drafted into a new guidance which was to be distributed for comment among industry and state representatives to ensure that effective Unified Command coordination takes place at the executive level in a major spill event, or one which involves multiple command centers. The US Coast Guard has been developing a revised Commandant Instruction on this issue internally, but has only recently been ready to invite the comment of the FOG Update Project Workgroup on that document. Since it covers multiple contingencies, the NIC/RIC structure applicable to an oil spill of national significance is not the exclusive focus of the draft Commandant Instruction.

The National Contingency Plan directs both EPA and the USCG to provide strategic coordination for a Spill of National Significance (see Section 300.323). It is stated in the preamble of the NCP, under discussions of Section 300.120 that "...the CWA section 311( c ), as amended by the OPA, provides that the FOSC may direct or monitor all Federal, State, and private actions to remove a discharge, and, in the case of a substantial threat to the public health or welfare of the United States, must direct such actions." Thus it is clear that the FOSC has the authority to direct State and private actions.

What is not clearly stated in the NCP or elsewhere, however, is whether the FOSC would continue to work through a Unified Command structure at the NIC/RIC level, which involves the top executives of the RP's corporate structure and the governor of the affected state, or whether the controlling Federal agency would "direct State and private actions" outside of the UC paradigm. The fact that this issue is unresolved to their satisfaction is the primary reason for ADEC's objection to including the NIC/RIC text in this iteration of the Oil Spill FOG. During the conference call discussions on this issue, CAPT Larry Hereth of the US Coast Guard Office of Response stated that the USCG would prefer not to direct state and private resources, but would prefer to work through Unified Command instead on decisions regarding resource allocation. This statement of intention is supported by the language in the NIC/RIC section which acknowledges that "...the NIC/RIC will work with the RP and other agencies to agree on an organizational structure that best ensures effective strategic coordination." Similarly, the draft Commandant Instructions include the RP and "State or other agency" in a Unified Command organizational chart (Appendix A). In addition, Appendix F, which covers a Spill of National Significance, states that "A unified National Incident Command will be established....[which] will include responsible party representatives in addition to government representatives....[which] should typically be at the highest executive levels...."

CAPT Hereth further stated that the USCG would be willing to work with the states and other interested stakeholders, as well as EPA, to improve understanding of how an FOSC would coordinate with states and responsible parties at the executive level. Furthermore, the US Coast Guard believes that explaining in the FOG how they plan to organize for such an eventuality is a courtesy to other responders and does not preclude other agencies or RPs from organizing themselves in a different manner. Area Contingency Plans or documents such as the Alaska Incident Management System (AIMS) document can be used to explain how states and private companies plan to organize at the executive level.

#### The Role of the Deputy OSC

The role of a Deputy OSC is described under both the Incident Commander and the Unified Command sections of the Oil Spill FOG 2000 as assistants to an OSC who must be qualified and prepared to replace that OSC, as needed. They are not shown on any of the organization charts and should not be construed as serving any role which would filter information coming to or from the OSC whom they support.

#### **Related Endeavors**

The context of this effort to update the oil spill FOG includes two concurrent endeavors which have both shaped, and been shaped by, the discussions and decisions of this Workgroup. These concurrent projects are the creation of the Alaska Incident Management System Guide for Oil and Hazardous Substance Response, and a project by the National Response Team to apply NIIMS ICS principles to multiple emergency contingencies.

#### The Alaska Incident Management System Guide for Oil and Hazardous Substance Response

An updated version of the oil spill FOG was prepared by the Alaska Department of Environmental Conservation (ADEC) in 1998; this incorporated parts of the Alaska Clean Seas (ACS) Technical Manual, and also captured the lessons learned from spills and drills in Alaska. In October 1998, the Statewide Oil and Hazardous Substance Incident Management System Work Group

was created; this included representatives from Federal and State agencies, as well as representatives from the oil industry and spill cooperatives. The primary task of this ad hoc work group was to prepare standardized spill response management guidelines acceptable to all users in Alaska. The resultant product, *The Alaska Incident Management System Guide for Oil and Hazardous Substance Response (AIMS Guide)*, is customized to meet Alaska's unique needs. It is accepted by both government and industry users in Alaska and will yield substantial savings to users by providing a guideline for adoption and maintenance of a single system for the Alaska spill response community. The AIMS Guide is consistent with revisions being prepared by the States/British Columbia Task Force-sponsored FOG Update Workgroup.

The following is a brief summary of the major features of the AIMS guide:

- **Three Levels of a Response:** This guide recognizes that there may be three levels of a response with a corresponding team for each level: response in the field by the Field Response Team (FRT); follow-on incident management by the Incident Management Team (IMT); and upper level crisis management support provided by a Crisis Management Team (CMT). The specific roles and responsibilities of each team are addressed in the appropriate sections.
- **Three Potential Roles for Governmental Agencies:** This guide also recognizes three potential roles for government agencies engaged in a spill response operation. These include government oversight, augmentation of a responsible party's response, and government as the lead agency.
- **Local On-Scene Coordinator (LOSC):** The role of the LOSC is discussed in this guide. The LOSC is a part of the Unified Command (UC) in situations where there is an immediate threat to public health and safety, and/or where local involvement in the UC is otherwise identified in the sub-area contingency plans.
- **Regional Stakeholder Committee (RSC):** In an effort to minimize the confusion with the NIIMS MACS concept, the term RSC was developed to denote the group of stakeholders who may have a vested interest in a spill event.
- **Incident Action Plan/General Plan (IAP/GP) Unit:** This is an optional unit that may be formed within the Planning Section. The unit's primary focus is preparation of the IAP and GP.
- **Operations Section Organization:** Within the Operations Section, the guide provides for a wide variety of functions that may be organized into branches, divisions, groups, task forces, etc. A pre-established organizational structure is not provided, as each situation will determine the need for functional elements, which can then be organized to best meet the needs of the Operations Section Chief.
- **Incident Management System Knowledge/Training Guidelines:** A separate appendix (*Appendix C*) provides recommended knowledge and training guidelines for each of the IMS positions discussed in the guide.
- **General Purpose and Description of ICS Forms:** Although no forms are included in this document, the general purpose for the use of each form is provided.
- **IMT Meeting Guidelines:** A general schedule of events (*an Incident Management System Planning Cycle*) and the objectives and topics for specific meetings are provided as a guideline.
- **Incident Situation Status – Information Center Status Boards:** Standard Situation Status Board examples are provided as a guideline to post in the Information Centers.

At their February 2000 meeting, the Alaska RRT co-chairs proposed to adopt the guide for use in establishing an incident management system for oil and hazardous substance spill response in Alaska. Under this proposal, they have distributed the guide so that it can be reviewed and tested on a continuous basis, and they plan to evaluate and modify it for inclusion into a future revision of the Unified Plan (or perhaps incorporate it by reference).

#### National Response Team Development of a Multi-Contingency Field Operations Guide

Workgroup representatives from the US Environmental Protection Agency and the US Coast Guard advised the Workgroup at their first meeting that the National Response Team was interested in

developing a multi-contingency (also called “all hazards”) FOG which would aid in applying NIIMS ICS principles to a wider range of emergency incidents. USCG LCDR Huyck of the Office of Response explained that a Response Management Coordination Council has been established within the US Coast Guard to work through uniform implementation system-wide and to develop a generic ICS for all hazards, adding annexes for natural disasters, terrorism, and hazardous material incidents. The US Coast Guard plans to continue efforts to develop a multi-contingency FOG internally as well as for the National Response Team, and provided a draft copy to the Workgroup at their June, 1999 meeting for their review and comment. The revised Oil Spill FOG is expected to provide the basis for the oil spill annex in future multi-contingency FOGs.

**Next Steps**

In addition to this project report, a one-page summary and a Power Point presentation will be available to each FOG Update Project Workgroup member, along with copies of the final FOG and oil spill forms. This entire package is then available for outreach efforts by Workgroup members. The following Workgroup members have volunteered to contact certain constituency groups and brief them on the revisions to the oil spill FOG:

<u>Target Constituency</u>	<u>Designated Delegate</u>
API	Jim Clow
APICOM, SCAA	Jean Cameron with Lee Eglund
AWO	Lee Eglund
Area Committees, RRTs, NRT	USCG, EPA
EPA Regions	EPA
USCG Districts	USCG
Training Industry	Terry Joslin
States	States/BC Oil Spill Task Force

Moreover, each FOG Update workgroup member is expected to serve as liaison to their own company, agency, or organization.

The revised oil spill FOG will be available on the NOAA and US Coast Guard websites<sup>3</sup> or for purchase through the Government Printing Office after August 15, 2000.

As noted on the last page in the Introduction section of the revised FOG, comments and recommendations for additional changes to the FOG should be sent to the US Coast Guard’s Office of Response (address provided). The US Coast Guard Office of Response will assume responsibility to update the FOG on a three-year cycle, or as needed. As noted above, the US Coast Guard is working within the NRT to develop a Field Operations Guide which addresses multiple contingencies, not just oil spills. Therefore, the next update to the oil spill FOG is likely to be an update of what will actually be one section in the multiple-contingency FOG.

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<sup>3</sup> For the FOG, forms, and job aids: [www.uscg.mil/gg/g-m/nmc/response/fog.pdf](http://www.uscg.mil/gg/g-m/nmc/response/fog.pdf) or [www.uscg.mil/hq/nsfcc/nsfweb](http://www.uscg.mil/hq/nsfcc/nsfweb) or for the ICS forms only: [response.restoration.noaa.gov/oilaid.htm](http://response.restoration.noaa.gov/oilaid.htm)