

BACKGROUND: PART TWO – RESPONSE POLICY AND STRATEGIES

The strategy for responding to a specific spill or hazmat incident depends upon numerous factors. The strategy can change as the situation changes. As a general rule, the strategies listed below should be used as a guide in developing an effective response. Consider all factors that may affect the particular situation and revise/modify/expand these priorities as the situation dictates. The strategies are further delineated in the procedures contained in the Response Section. Additional information can be found in the **Unified Plan**.

A. FEDERAL RESPONSE ACTION PRIORITIES/STRATEGIES

The following priorities are general guidelines for response to a pollution incident within the COTP Western Alaska zone. They are based on the premise that the safety of life is of paramount importance in any pollution incident, with the protection of property and the environment, although important, being secondary. Nothing in this part is meant to indicate that higher priority items must be completed before performing a lower priority task. They may be carried out simultaneously or in the most logical sequence for each individual incident.

- Priority One - Safety of Life - for all incidents which may occur, the safety of personnel, including response personnel, must be given absolute priority. No personnel are to be sent into an affected area without first determining the hazards involved and that adequate precautions have been taken to protect personnel.
- Priority Two - Safety of Vessel/Facility and Cargo - the facility and/or vessel and its cargo shall become the second priority.
- Priority Three - Protection of the Environment by elimination of the pollution source - containment and recovery of oil in the open water must be effected expeditiously to preclude involvement of the beaches and shorelines. Due to remote locations and restricted accessibility, it is extremely difficult to protect the majority of the coastline by diversion or exclusion methods. Therefore, securing the source and open water containment and recovery is especially critical and should normally be the first line of defense to protect the environment. Likewise, spills which occur on land or in upland water courses will be dammed, boomed, diked, etc., as feasible to prevent the spread of the pollutant downstream. NOTE: *In situ* burning (Unified Plan, Annex F for checklist) of a vessel and its pollutant may be an alternative considered by the OSCs; this strategy places environmental protection priorities above saving the vessel and its cargo.
- Priority Four - Protection of the Environment by diversion/exclusion, dispersion, or in-situ burning. In the event that the location of a spill or the weather conditions do not permit open water recovery, protection of the shoreline becomes paramount, especially areas of greatest sensitivity. It is not possible to protect some areas entirely or even in part. It may be necessary to sacrifice some areas in order to achieve the best overall protection of the environment. The OSC may consider *in situ* burning as a response option. Refer to the **Unified Plan** for an *in situ* burning checklist. The use of dispersants must be considered early in the response phase while the oil is in the open water. Subpart J of the NCP and the **Unified Plan (Annex F)** address in detail the responsibilities of the OSC in the use of chemicals.
- Priority Five - Protection of the Environment by beach cleanup and the use of Sacrificial Areas. It may not be possible to protect the entire shoreline from oil. In fact, it may be allowed purposely to come ashore in some areas as an alternative to damaging others. Selection of the proper shoreline cleanup technique depends on many different factors including the following:

- Type of substrate
- Amount of oil on the shoreline
- Depth of oil in the sediment
- Type of oil (tar balls, pooled oil, viscous coating, etc.)
- Trafficability of equipment on the shoreline
- Environmental or cultural sensitivity of the oil shoreline
- Prevailing oceanographic and meteorological conditions

The best way to minimize debate over the most appropriate response is to involve all interested government and private agencies. The shoreline assessment groups shall attempt to agree on the amount and character of the oil that is on the shorelines, anticipate interactions between the stranded oil and the environment, and the geological and ecological environment of the involved shorelines. Once a consensus is met, a process is necessary to determine the proper treatment required.

Shoreline cleanup options may include the use of physical and/or chemical processes. Chemical shoreline cleanup products may increase the efficiency of water-washing during the cleanup of contaminated shorelines. However, the product must be listed on the EPA National Contingency Plan Product Schedule and authorization must be obtained from the ARRT and the government on-scene coordinator at the spill. Physical shoreline cleaning methods include techniques such as: natural recovery, manual sorbent application, manual removal of oiled materials, low pressure flushing (ambient temperature), vacuum trucks, warm water washing, high pressure flushing, manual scraping, mechanical removal using heavy equipment. Bioremediation is also considered as a shoreline cleaning method. Bioremediation is the application of nutrients to the shoreline to accelerate the natural biodegradation of oil. The OSC shall request the RRT to provide site-specific guidelines for source protection measures required during shoreline cleanup operations.

B. STATE OF ALASKA RESPONSE PRIORITIES

1. **Safety:** Ensure the safety of persons involved, responding, or exposed to the immediate effects of the incident.
2. **Public Health:** Ensure protection of public health and welfare from the direct or indirect effects of contamination of drinking water, air, and food.
3. **Environment:** Ensure protection of the environment, natural and cultural resources, and biota from the direct or indirect effects of contamination.
4. **Cleanup:** Ensure adequate containment, control, cleanup and disposal by the responsible party or supplement or take over when cleanup is inadequate.
5. **Restoration:** Ensure assessment of contamination and damage and restoration of property, natural resources and the environment.
6. **Cost Recovery:** Ensure recovery of costs and penalties to the Response Fund for response, containment, removal, remedial actions, or damage.