

ORGANIZATIONAL APPROACH

2.1 GENERAL

There are three basic levels for a response to a major spill incident: response in the field; follow-on incident management; and upper level crisis management support. Three functional teams exist that collectively constitute the incident response organization:

Field Response Team (FRT): The FRT develops and implements tactics to carry out the strategies and priorities developed by the Incident Management Team (if activated) for emergency response operations. For a detailed description of the FRT, see Section 3.0.

Incident Management Team (IMT): The IMT determines strategic objectives and priorities to deal with the incident, approves tactics, and provides overall support to the FRT. See Section 4.0 for additional information regarding the IMT.

Crisis Management Team (CMT): The CMT, in turn, is activated to directly support the IMT and manage the organization's crisis response operations. See Section 5.0 for additional information.

The teams are organized and act in a manner consistent with the organizational and management principles of the Incident Command System (ICS) (see *Appendix A*). An overall relational diagram is provided in Figure 2-5.

Members of the teams have predefined roles and responsibilities. Appendix B of this guide provides detailed checklists for members of the the FRT and IMT for accomplishing assigned tasks.

In order to fully understand these teams and their organizational structure, it is important to appreciate the relationships between the responsible party and federal, State, and local spill response agencies.

2.2 FIELD RESPONSE TEAMS (FRT)

The major spill response organizations in Alaska have created FRTs to respond rapidly to address incidents that pose a physical threat to personnel, property, and the environment. Typical FRT tasks may include Hazmat, oil spill response, safety, security, source control, mechanical containment and recovery, alternative technologies, and wildlife hazing.

Depending on the incident, these tasks may take place in conjunction with other specialized teams responsible for firefighting, medical, technical rescue, etc.

One or more FRTs may respond to an incident. The responding FRTs handle all field emergency response operations. For a detailed description of FRT initial response duties, see Section 3.0.

The responding FRTs fill the roles of field command and all subordinate functions at an incident scene. Once the IMT is activated, the FRT becomes part of the Operations Section. The FRTs are responsible for executing the Incident Action Plan (IAP). FRTs are authorized to make field changes as necessary to ensure the safety of all responders, consistent with 29 CFR 1910.120 on-scene safety responsibilities. FRTs are also authorized to make field changes to maximize efficiency in accomplishing assigned tasks, based on common sense and existing on-site field conditions. They are obligated to report such changes and their progress on the tasks assigned by the IAP to the Operations Section Chief. The Unified Command within the IMT, and the FRT should have a clear understanding beforehand of the limits to discretionary field changes that will be allowed by the FRT, and which changes need to be communicated back to the IMT. The 204 form should clearly specify what tasks are mandatory and which actions are forbidden.

This escalation process should result in strategies being formulated that direct field response actions. Once the tactics are defined, the work should be broken down into manageable tasks. Each task should be assigned to a task leader (Strike Team Leader or Task Force Leader), and available response resources should be assigned. All updates to the overall strategy, tactics, and tasks should be forwarded from the field to the IMT for posting by the Situation Unit in the Incident Situation Display.

2.3 INCIDENT MANAGEMENT TEAM (IMT)

Each major incident response entity (industry, coops, federal, State) has access to IMT personnel who can be activated to form an IMT which assumes overall incident command, develops objectives and strategies, response priorities, and supports field response operations. Responsibility for executing tactics consistent with the strategies and priorities remains at the FRT level. For a detailed discussion of the IMT, see Section 4.0.

One of the factors that would lead to a decision to activate an IMT would be an incident severe enough to trigger the direct involvement of several response organizations in incident response operations. When this occurs, the IMT would take the lead in interacting with other responding personnel, which can include establishing a Unified Command structure (see *Appendix A*) and integrating response personnel, as appropriate, into the incident response organization.

Another factor that would contribute to a decision to activate an IMT is the decision to activate the CMT. When this occurs, the IMT is responsible for interacting with the CMT. Other factors such as press coverage or public interest may also necessitate activating an IMT. Figure 2-4 provides a diagram of the relationship between the IMT and CMT.

2.4 CRISIS MANAGEMENT TEAM (CMT)

When activated, the CMT determines what additional measures, if any, must be taken to support emergency response operations, and to identify, evaluate, and proactively address the crisis implications of the incident and emergency response operations. The mission of the CMT is to avoid crisis situations whenever possible, and to mitigate crisis situations that cannot be avoided to the maximum extent possible. For additional information regarding the CMT, refer to Section 5.0.

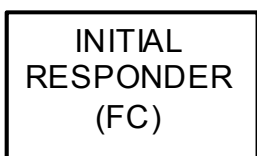
2.5 ALASKA INCIDENT MANAGEMENT SYSTEM (AIMS)

The vast majority of incidents occur without warning. As a result, members of all three levels of an incident response organization usually must begin their work in a reactive mode. The first priority for the FRTs, IMT, and CMT is to move from a reactive to a proactive mode of operation, as quickly as possible. This is done by engaging in a disciplined, fully integrated AIMS whose primary objective is the establishment and maintenance of command and control over the incident, emergency response operations, and the crisis implications of an incident.

Figure 2-1

**HYPOTHETICAL RESPONSE ESCALATION
(STEPS 1 AND 2)**

STEP 1:



NOTE:

1. FC = Field Command

STEP 2:

Located at the Field Command Post (FCP) (if established)

NOTES:

1. FC = Field Command (**On-Scene Commander, Initial Response Incident Commander**, Branch Director, Group/ Division Supervisor, etc.)
2. DFC = Deputy Field Command
3. Tactical Response = Response Branch Director or Division Supervisor
4. Source Control = Source Control Branch Director or Division Supervisor
5. Aides = Aides Provide the Following Services:
 - Communications
 - Technical Information
 - Information Management
 - Observers

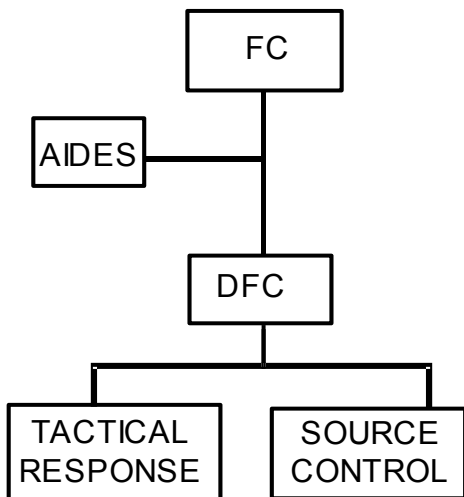


Figure 2-2

HYPOTHETICAL RESPONSE ESCALATION (STEP 3)

STEP 3:

Located at the Field Command Post (FCP) (if established)

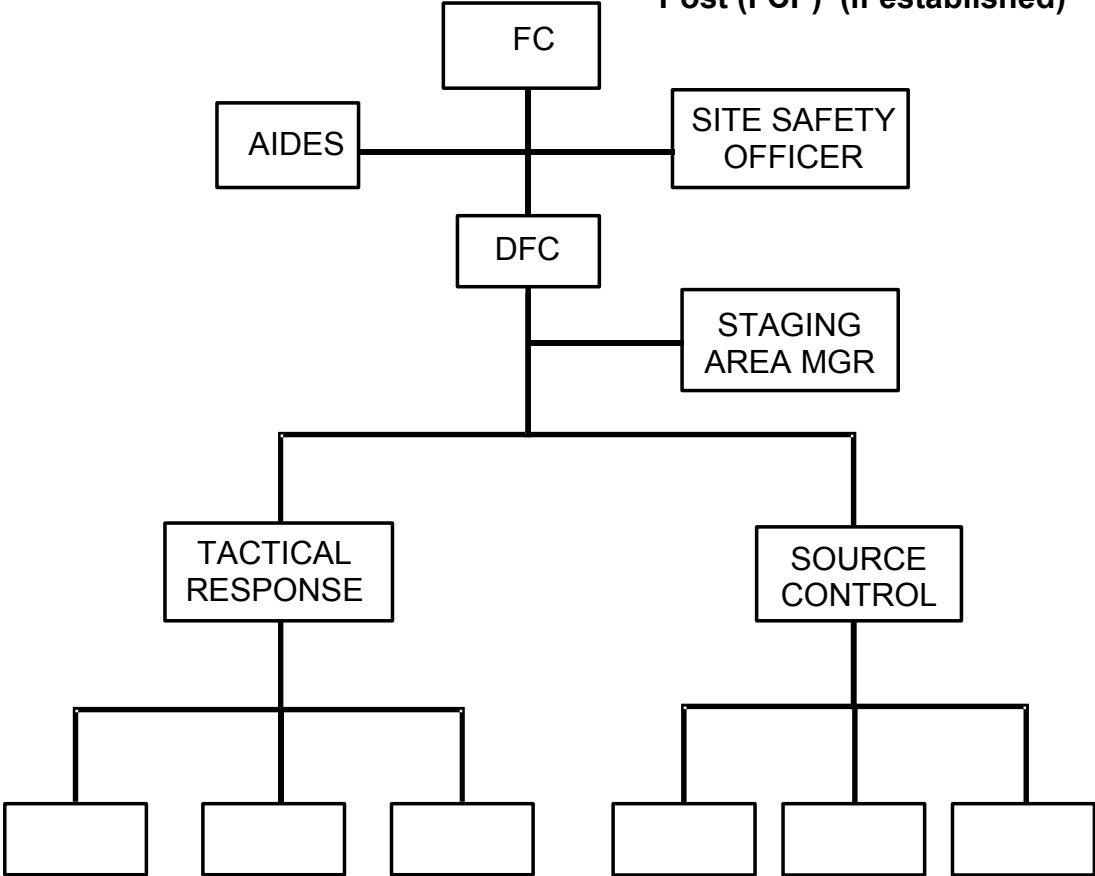
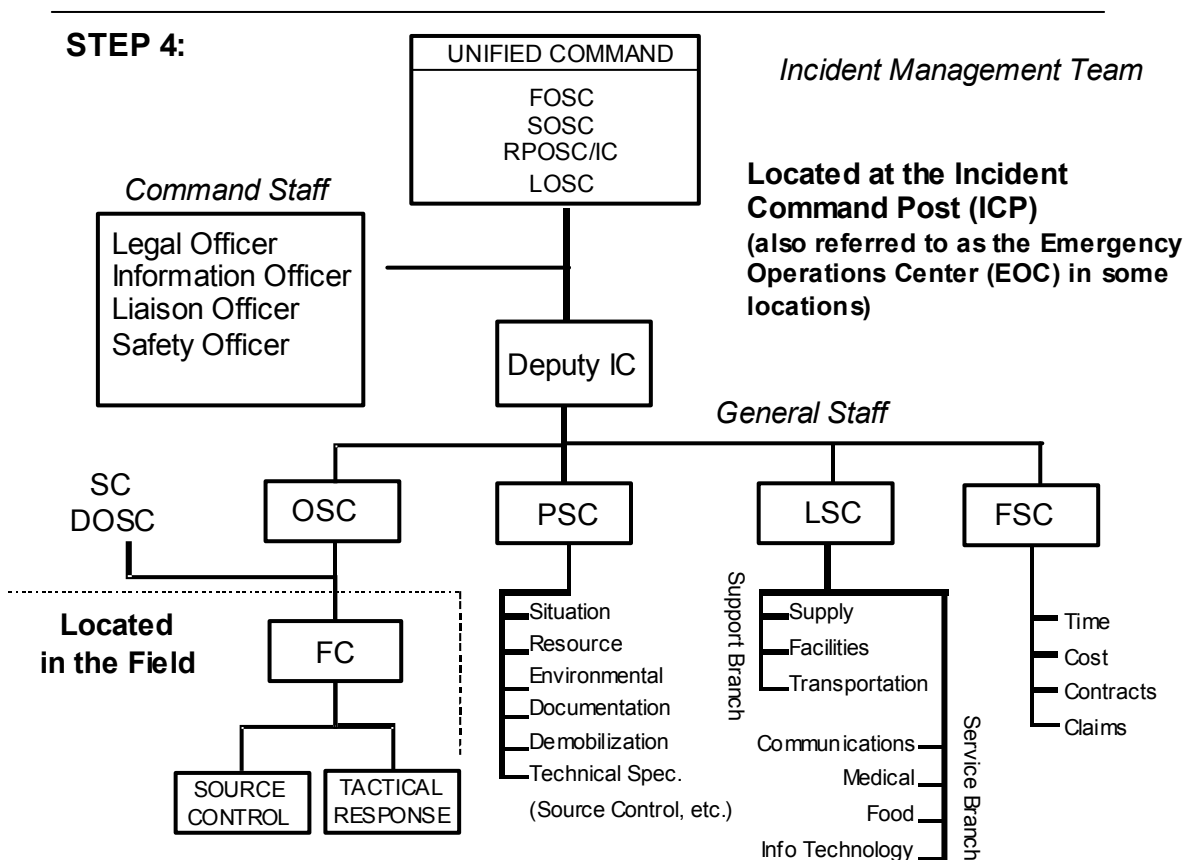


Figure 2-3

HYPOTHETICAL RESPONSE ESCALATION (STEP 4)



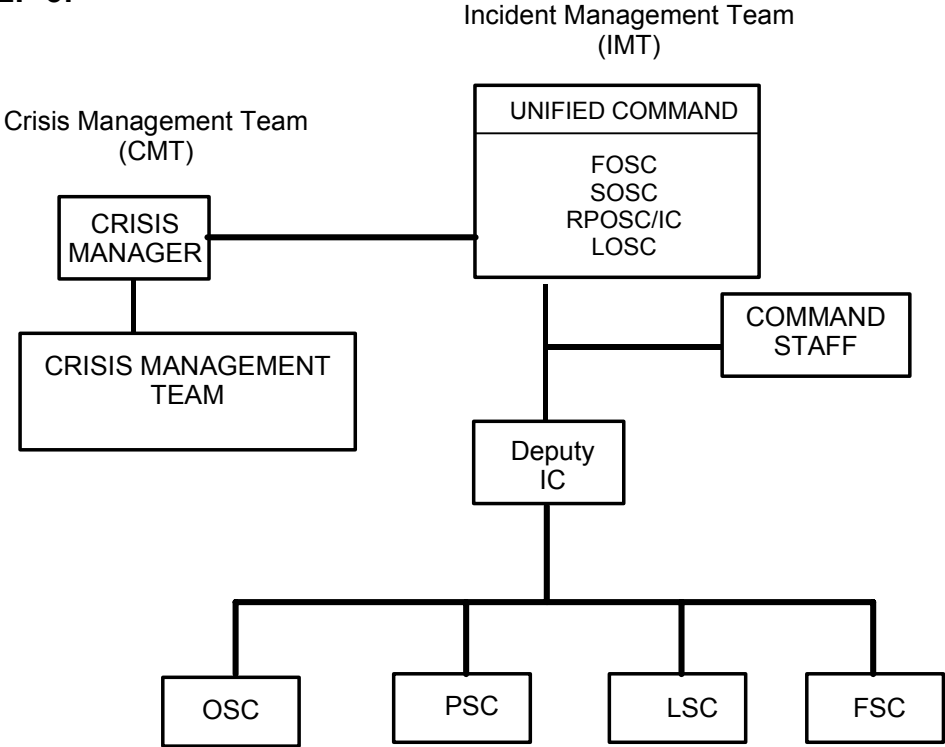
NOTES:

1. IC = Incident Commander
2. Deputy IC = Deputy Incident Commander
3. OSC = Operations Section Chief
4. PSC = Planning Section Chief
5. LSC = Logistics Section Chief
6. FSC = Finance/Admin Section Chief
7. FC = Field Command
8. SCDOOSC = Source Control Deputy Operations Section Chief

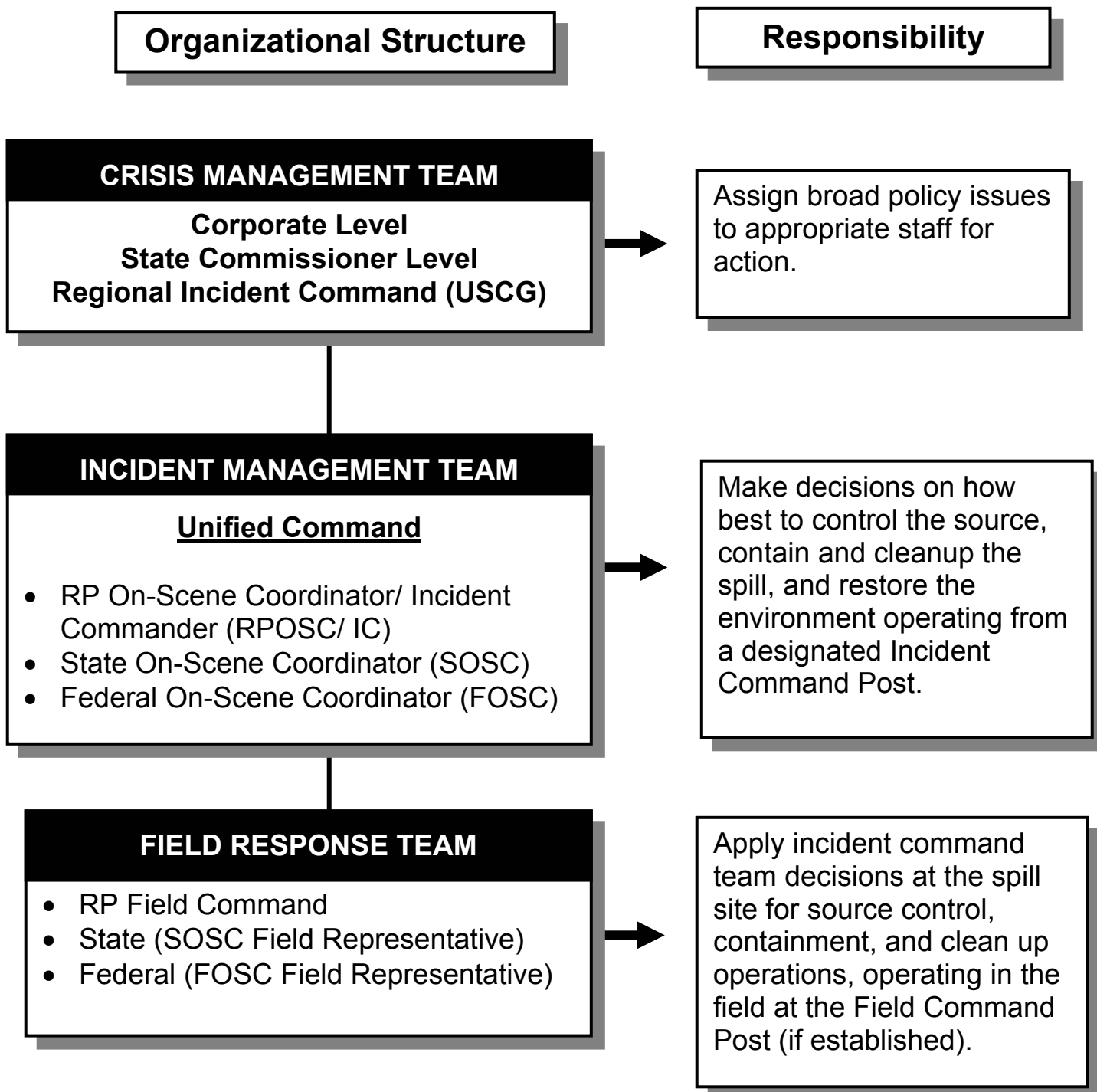
Figure 2-4

HYPOTHETICAL RESPONSE ESCALATION (STEP 5)

STEP 5:



**Figure 2-5
CMT, IMT, FMT RELATIONAL DIAGRAM**



2.6 RESPONSE AGENCIES

2.6.1 On-Scene Coordinators (OSCs)

The term “On-Scene Coordinator” is a legal term for the lead federal and State representatives who direct the response for federal and State governments. The Federal On-Scene Coordinator (FOSC) and the State On-Scene Coordinator (SOSC) are members of the Unified Command during significant spill events involving multiple jurisdictions.

The Responsible Party On-Scene Coordinator/ Incident Commander (RPOSC/ IC): The RPOSC normally serves as the Incident Commander (IC) as long as the Responsible Party is responding and has adequate resources to dedicate to the containment, control, and cleanup effort.

The Federal On-Scene Coordinator (FOSC): The FOSC is designated under the National Contingency Plan to direct and coordinate the federal response to incidents under the authority of federal laws and regulations.

Federal responsibilities are divided into a Coastal zone and an Inland zone, as defined by an interagency agreement between the USCG and the EPA. In the Coastal zone, the Commanding Officers of the USCG Marine Safety Offices are designated FOSCs for oil discharges and hazardous substance releases. For oil discharges and hazardous substance releases in the Inland zone, the EPA designates the FOSC. For releases of hazardous substances where the release is from any facility or vessel under the jurisdiction, custody or control of the Department of Defense (DOD) or Department of Energy (DOE), the department with jurisdiction designates the FOSC.

The State On-Scene Coordinator (SOSC): The State On-Scene Coordinator (SOSC) is responsible for directing and coordinating the State's response to oil and hazardous substance discharges. State On-Scene Coordinators are designated by the Commissioner of ADEC. State On-Scene Coordinators have been pre-designated for the following response areas: Northern Alaska; Central Alaska; and Southeast Alaska. In the event of a major spill incident, the Commissioner may designate the Director, Spill Prevention and Response Division or another individual to serve as the SOSC.

The SOSC may appoint an on-scene field representative (SOSC Rep) to act for the SOSC during a spill response. The SOSC Rep represents the SOSC on scene and can be selectively delegated authority by the SOSC.

The Local On-Scene Coordinator (LOSC): Local On-Scene Coordinators are designated by local governments with jurisdiction to direct and coordinate local responses to incidents. Local On-Scene Coordinators are part of the Unified Command **as long as there is an immediate threat to public safety, or as pre-identified in the applicable Subarea Contingency Plan.**

Community Emergency Coordinators (CECs) are designated in Local Emergency Response Plans and may serve as the LOSC or on the Regional Stakeholder Committee (RSC) as outlined in the Subarea Contingency Plans.

For **as long as there is an immediate threat to public safety within his/her jurisdiction**, the LOSC serves as the ultimate command authority if the FOSC or SOSC does not assume the lead role for response, or unless the LOSC requests a higher authority to assume that responsibility. Once the immediate threats to public safety are abated, either the SOSC or FOSC becomes the ultimate command authority for the cleanup operation, depending on jurisdiction and agency response. Local representation to the Unified Command may then be through the CEC on the RSC.

The OSCs represent all agencies from their respective federal, State, local, and industry organizations as Unified Commanders in the Unified Command. They are also responsible for coordinating their organization's activities with the activities of other response organizations (*see Figure 2-6, On-Scene Coordinator's Relationship to Plans*).

Deputy On-Scene Coordinators: The nature of an incident may require one or more deputies. Deputy OSCs should have the same qualifications as the OSC and may work directly with the OSC, be a relief, or perform certain specified tasks determined by the OSC.

2.6.2 The Responsible Party (RP)

The RP is the organization or individual responsible for a discharge of a hazardous substance to the water or land of the State. Under State regulations (18 AAC 75.315), it is the responsibility of the RP to contain, control and clean up that discharge. Similar federal laws require RPs to respond to their spills and oblige the RP to direct his/her own containment, control and cleanup efforts. Even though the RP is required to respond to a spill, the SOSC oversees the RP's containment, control and cleanup efforts and has the authority to take over or supplement the response activities if the SOSC determines that the response is inadequate (18 AAC 75.320). The FOSC has similar authority under federal law. Additionally, the Oil Pollution Act of 1990 (OPA 90) authorizes the USCG and the EPA to direct the activities of the RP without taking federal control of the spill cleanup.

Facility or vessel response or contingency plans designate the RPOSC to direct and coordinate the RP's resources in response to incidents for which they are responsible. If the facility or vessel does not have a response or contingency plan, the RPOSC is the person in charge of the RP's response.

Qualified Individual (QI): A QI is a person located in the United States who meets the requirements identified in the respective federal regulations [*USCG, EPA, the U.S. Department of Transportation's Research and Special Programs Administration (RSPA), U.S. Department of the Interior (DOI), Minerals Management Service (MMS)*] and who is authorized to do the following: (1) activate and engage in contracting with oil spill removal organizations; (2) act as a liaison with the On-Scene Coordinator; and (3) obligate funds required to effectuate response activities. The QI will be the individual or a designee identified in the response plan. The State of Alaska does not specifically require the designation of a QI. However, industry contingency plans for regulated vessels and facilities must specifically identify the person who, by law or through employment, contract, or cooperative agreement, is responsible for responding to the discharge. Industry contingency plans must also include a description of the command system to be used in response to a discharge.

2.6.3 The Governments' Role in an Incident Response

The State and federal governments are responsible for oil and hazardous substance pollution under the National Contingency Plan (NCP) and State statutes to ensure the responses to incidents are timely and adequate. The governmental responsibility has three aspects:

Oversee the RP's actions by setting joint objectives, approving incident action plans, monitoring overall response actions, and approving permits.

Augment the RP's cleanup efforts when necessary to contain the release, recover the product, and minimize the impact to the environment. These government augmentation efforts are in addition to the oversight tasks described above.

Take over containment, control and cleanup operations when necessary.

The federal and State governments participate in these three functions and coordinate them using Unified Command. The discussion in Part 2.7 addresses the ICS organization for these three aspects, oversight, augmentation, and takeover. The federal and State governments' oversight function typically involves government resources (either on-hand resources or resources obtained via contract), although it is coordinated with the other parties involved in the actual cleanup effort. For more information, see Appendix A.

NOTE: *There are additional agency responsibilities that are managed simultaneously throughout the incident but not through the joint efforts and combined resources of the Unified Command. These include, as an example, investigation and law enforcement, natural resource damage assessment, restoration activities, and maintaining documentation for possible litigation or cost recovery.*

2.7 WHO COMMANDS

2.7.1 The Incident Commander (IC)

The Unified Command directs all aspects of incident response (*including oversight, monitoring, cleanup, etc.*) and uses a designated IC to manage containment, control, and cleanup operations (see *Figure 2-7, Incident Commander*).

The IC is in command of control, containment, removal, and disposal of the spill. At any given time, there can be only one IC. However, the IC can change as the incident changes. The IC will be chosen by the Unified Commanders (*FOSC, SOSC, LOSC, and RPOSC*). When the RP is responding and has adequate resources to dedicate to the containment, control, and cleanup effort, the RPOSC will normally be designated the IC by the Unified Commanders. The FOSC and SOSC make the determination on the adequacy of the RP's containment, control, and cleanup effort.

Only if the RP is unknown or is not adequately responding to the incident, will the government OSCs (*FOSC and SOSC*) participating in the Unified Command designate an IC. Typically, one of the On-Scene Coordinators or a response action contractor will become the IC.

2.7.2 Single Command

Whenever an incident occurs where there is single jurisdiction and one entity has primary responsibility, the SINGLE COMMAND structure is established. This situation occurs when there is no RP, or the RP is unable to satisfactorily respond and either federal, State or local government responds (*not more than one*), or the State and federal agencies elect to have the RP respond and cleanup the incident (*for small spills which may not require federal or State response*).

"Who's in Charge?" -- The Incident Commander (IC), designated by the jurisdictional agency:

- If the federal government is the agency in charge, the FOSC will be a USCG official if the spill occurs in the Coastal zone, or an EPA official if

the spill occurs in the Inland zone. The DOD will provide the FOSC if a spill involves military resources and occurs on military facilities.

- If there is no federal jurisdiction or the FOSC designates the State to act as the FOSC's representative, the State is the agency with jurisdiction.

2.7.3 Unified Command

The Unified Command described here for oil and hazardous substance discharge response is specific to Alaska and is not identical to the Unified Command described in the National Interagency Incident Management System (NIIMS) version of the ICS. In the NIIMS ICS, all agencies which have jurisdictional authority or a functional role in an incident are represented in the Unified Command. In the State of Alaska approach to Unified Command for oil and hazardous substance discharge response, only the On-Scene Coordinators (OSCs) for the federal, State and local governments (*for incidents posing an immediate threat to public safety*), plus the On-Scene Coordinator for the RP are represented. Other agencies are represented by the respective OSC for the federal, State and local government (*see Figure 2-8, Unified Command*).

Whenever there is an incident involving more than one agency with jurisdiction, the **Unified Command** is implemented. The Unified Command is also implemented if the RP is responding adequately and federal and State government is fulfilling their oversight role. All agencies which have jurisdictional responsibilities, and the RP, contribute to the process of:

- Determining overall incident objectives and priorities;
- Selection of strategies;
- Ensuring joint planning for tactical activities;
- Ensuring integrated tactical operations are conducted;
- Maximizing use of all assigned resources; and
- Resolving conflicts.

For significant oil spills and hazardous substance releases, there will normally be OSCs from the federal, State, and local governments (*for incidents posing an immediate threat to public safety*), and the RP. These individuals will each become a Unified Commander representing their organization.

"Who's in Charge?" -- The Unified Commanders with the FOSC having ultimate authority for incidents under federal jurisdiction; the SOSC having ultimate authority for incidents not involving federal jurisdiction. Also, **as long as there is an immediate threat to public safety**, a LOSC serves as the ultimate command authority if the FOSC or SOSC does not assume the lead role for response, or the LOSC requests a higher authority to assume

that responsibility. The RP has the authority as long as the RP is adequately responding to the incident (*and there is no immediate threat to public health and safety*).

The Unified Command respects all governmental agencies' and private jurisdictional authorities. Most of the time, the Unified Command is able to agree upon a single incident action plan. In cases where there are disputes or differences, the OSC having ultimate authority described above settles the disputes or differences.

The Unified Commanders will:

- Designate the Incident Commander (IC) (*who will normally be one of the Unified Commanders assigned to the Unified Command*);
- Designate the chiefs for each section within the ICS; (when resources are not available from the RP);
- Review and approve a consolidated incident action plan; and
- Ensure the incident action plan is carried out by the IC.

2.8 NATURAL RESOURCE TRUSTEES

The following are the Federal and State natural resource trustees in Alaska:

Federal

- Department of Commerce
- Department of the Interior
- Department of Defense
- Department of Agriculture

State

- Department of Environmental Conservation
- Department of Natural Resources
- Department of Fish and Game
- Department of Law

Note: The FOSC and the SOSC are the lead agencies for the Federal government and the State of Alaska, respectively. As part of the Unified Command, the FOSC and SOSC are the ultimate decision-makers (for federal and state agencies, respectively) on response matters.

2.8.1 Trustee Activities During an Emergency Response: Principal trustee activities include:

- **Identify/ Prioritize Resources at Risk:** Trustees can supplement the OSC's information on sensitive resources found in the federal/state subarea plans and industry contingency plans. The trustees provide local expertise and up-to-date information relevant to the specifics of the incident. Trustees also may assist the OSC in priorities in the plans for sensitive habitat and resources requiring protection.
- **Evaluate Protective Measures and Clean-up Strategies:** Trustees can advise the OSC on determination of cleanup endpoints (i.e., how clean is clean). For Federal lands or resources, the land/resource manager may have an integral role in determining the cleanup endpoint.
- **Participate in Team Assessing Clean-up (Shoreline Clean-up Assessment Team (SCAT) in coastal areas):** Trustees can provide resource experts to assist in assessment of clean-up activities. For Federal lands or resources, representatives of land/resources manager(s) may participate in clean-up assessment. Observations relevant to natural resource injury determination made by members of the clean-up assessment team may be provided to trustee representatives with NRDA responsibility.
- **Participate in Post Clean-up Inspection (Sign-off Team):** Trustee participation on inspection teams at proposed completion of cleanup activities can assist the OSC in determining adequacy of cleanup. For Federal lands or resources, a representative of the land/resource manager may participate on the sign-off team.
- **Wildlife Rehabilitation:** Trustee representatives participate through the ICS regarding appropriate response actions for injured wildlife. Trustee representatives ensure proper rehabilitation organizations are contacted and necessary permits have been obtained. They provide oversight to ensure wildlife response plans are implemented appropriately. Trustees also maintain chain of custody for wildlife that cannot be rehabilitated. Trustee representatives are responsible for development and implementation of wildlife release protocols.

2.8.2 Natural Resource Trustee Participation in ICS/ UC in Support of Response: Depending on the nature of the incident, trustee representatives, acting as natural resource or land managers, may participate in one or more ICS units

- **Planning:** Trustee representatives can provide information about sensitive resources and appropriate response techniques through the Environmental Unit of this section. The Environmental Unit is likely to be the most common location for trustee participation in the ICS. Trustee representatives may participate and assist in activities affecting lands and resources under their jurisdiction. For example, trustee representatives may identify changes in protection priorities or response activities that could prevent or minimize adverse effects to natural resources.
- **Operations:** Trustee representatives may participate and assist in implementation of wildlife response efforts. This is particularly important to ensure these efforts are in compliance with relevant laws. Trustee representatives may participate and assist in activities affecting lands and resources under their jurisdiction.
- **Command:** For incidents with significant effect or the potential for significant effect on trust resources (e.g., critical habitat for threatened and endangered species), having a trustee representative in Command may help to ensure that information on these resources is available to and used appropriately in decision making. For incidents that threaten or affect Federal lands or resources, depending on the management agency and the laws it operates under, it may be advisable to have a representative from the affected agency as part of Command. This representative may provide guidance/concurrence on response and protection strategies commensurate with the special status of the affected or threatened lands or resources. (Note the presence of this representative does not change the OSC's authority to direct, monitor, and coordinate response actions. The FOSC in every case retains the response authorities consistent with the NCP, 40 CFR 300.120 and 300.125. While it is highly desirable to obtain concurrence, consultation with trustee representatives does not mean the FOSC must have such concurrence. The FOSC is the ultimate decision-maker within the Unified Command and represents all federal agencies for response matters.)

- **Logistics:** When trustees have significant equipment and vehicle resources or facilities to contribute to the response, it may be useful to have trustee representatives in this section. This might be the case when a spill occurs on or threatens Federal land.
- **Finance/ Administration:** If there is significant trustee agency participation in the response, a trustee representative in this section may assist in supporting trustee personnel. This could involve dealing with time-record documents for personnel and equipment, handling cost estimates and records for trustee agency personnel, etc.

Figure 2-6: ON-SCENE COORDINATOR'S RELATIONSHIP TO PLANS

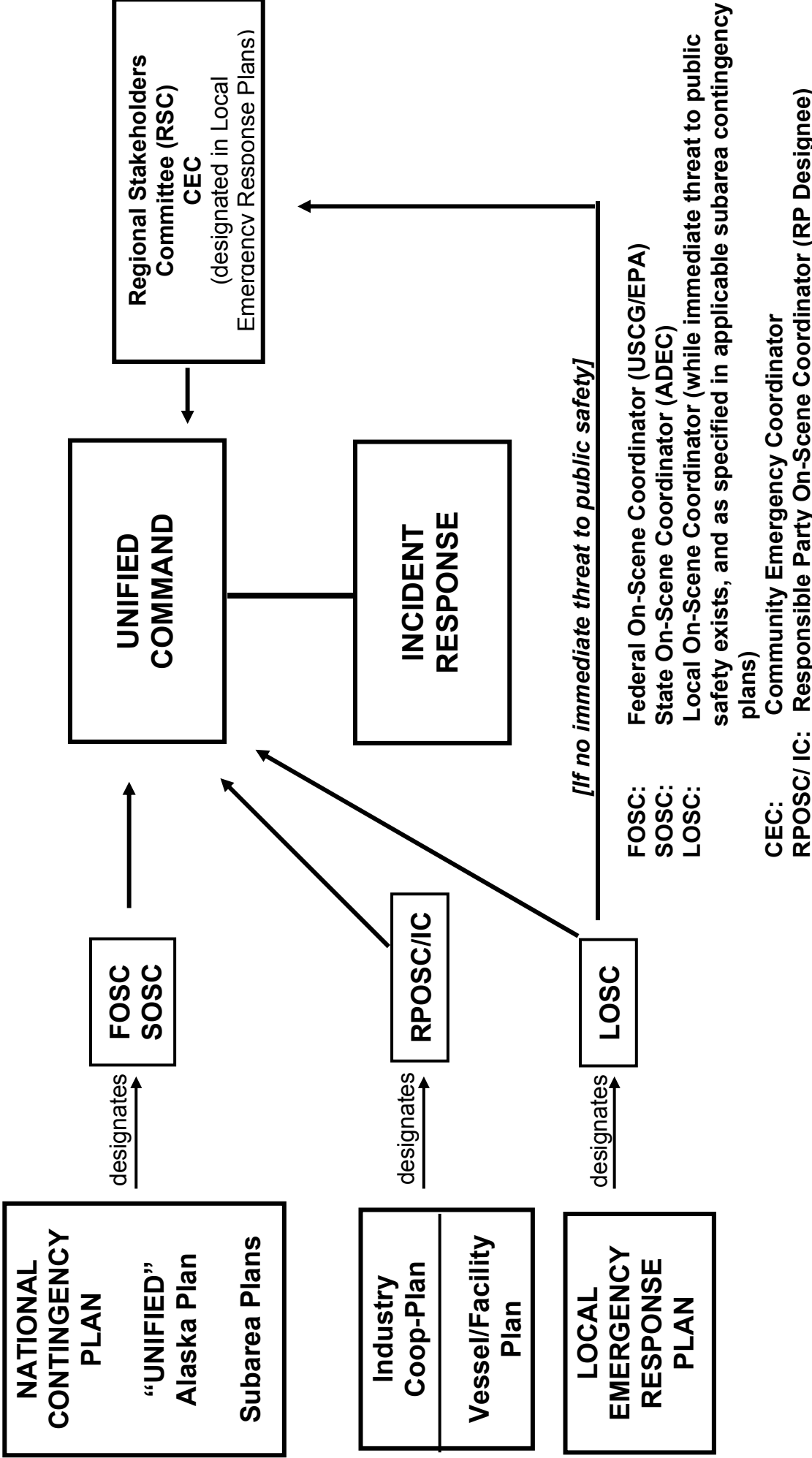
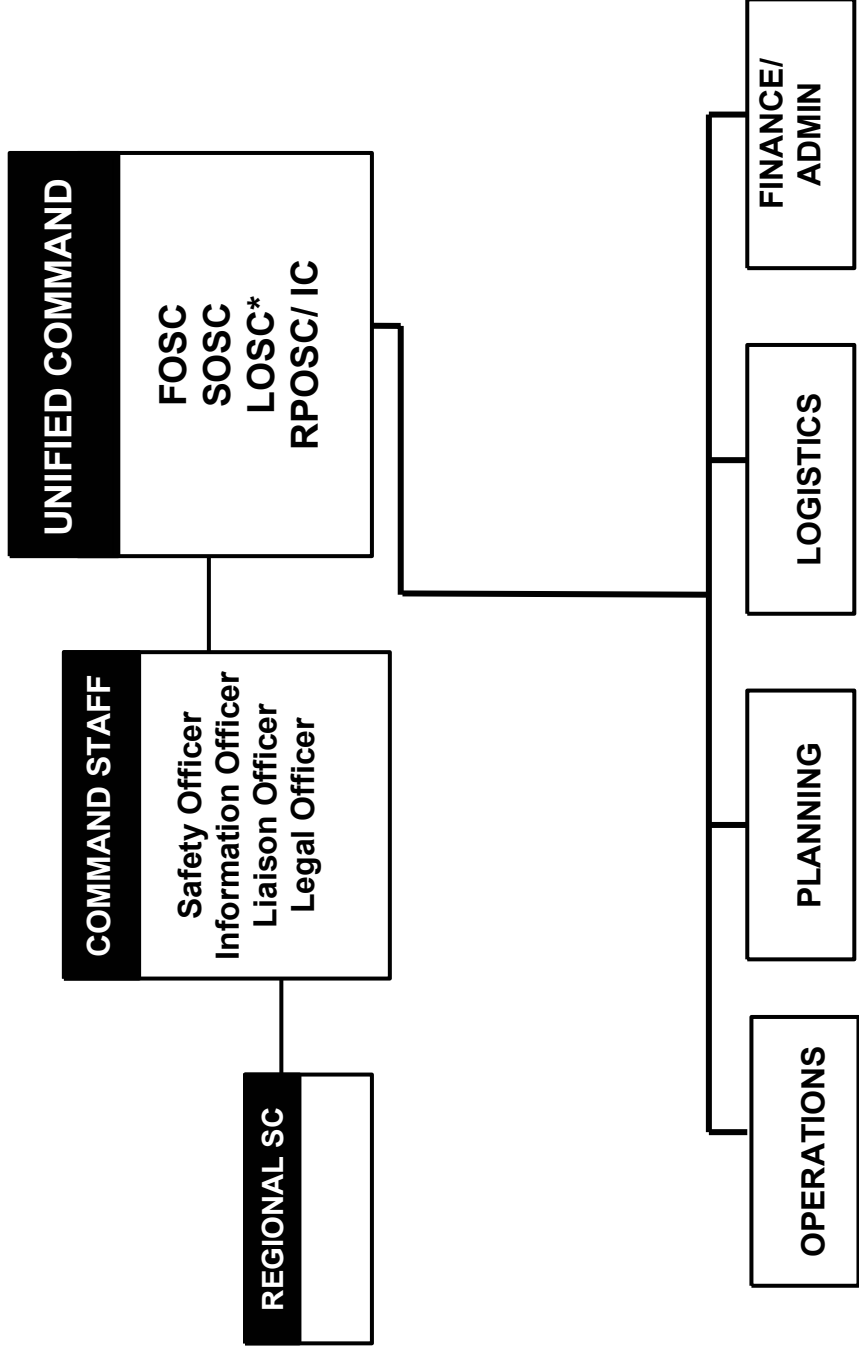
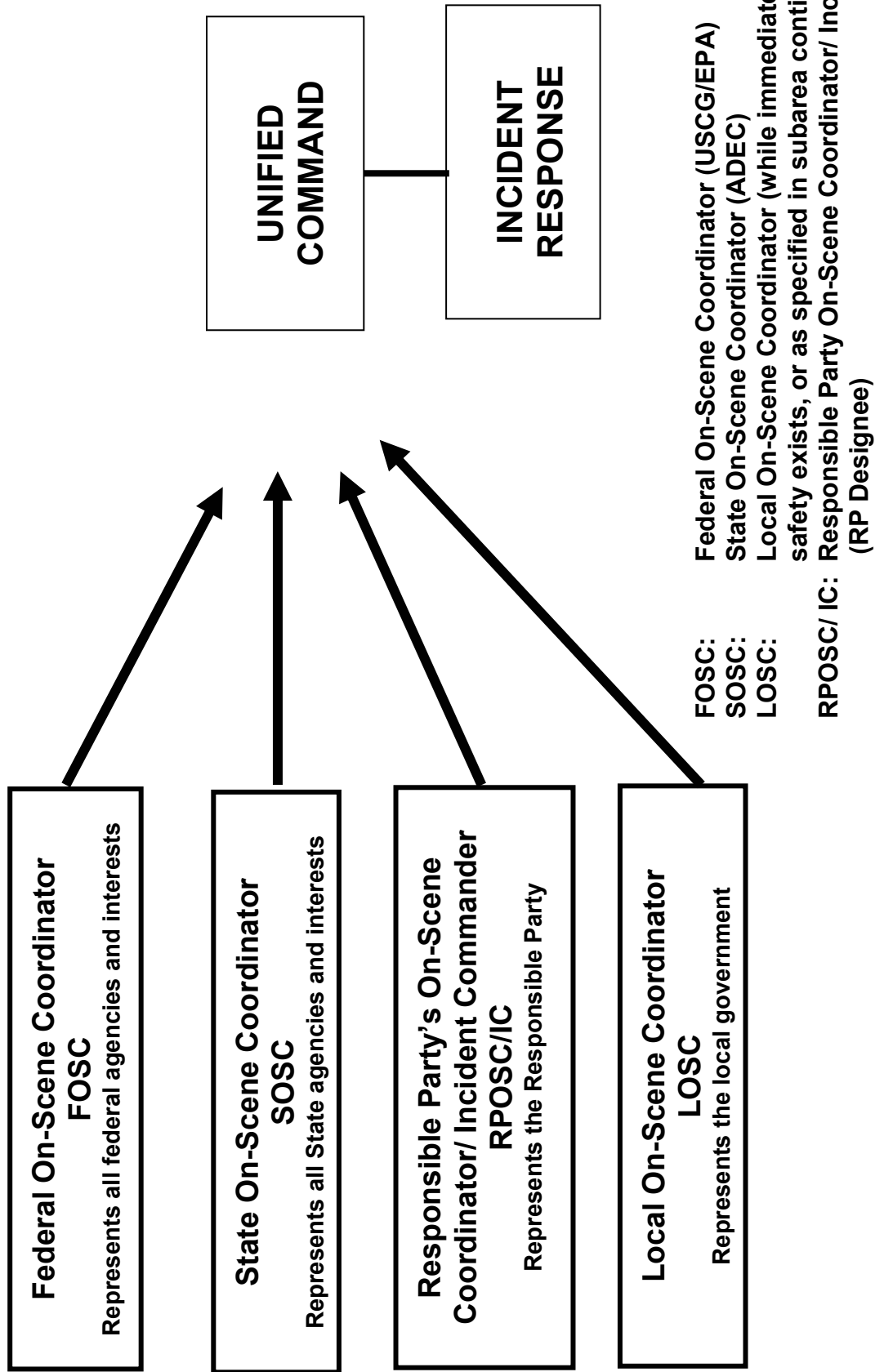


Figure 2-7: INCIDENT COMMANDER



- FOSC: Federal On-Scene Coordinator (US Coast Guard/EPA)
- SOSC: State On-Scene Coordinator (ADEC)
- *LOSC: Local On-Scene Coordinator (while immediate threat to public safety exists, or as specified in subarea contingency plans)
- RPOSC/ IC: Responsible Party On-Scene Coordinator (Spiller Designee)

Figure 2-8: UNIFIED COMMAND



End of Section 2