Northern Michigan
Area Contingency Plan

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1000 INTRODUCTION

This Area Contingency Plan (ACP) describes the strategy for a coordinated federal, state and local response to a discharge or substantial threat of discharge of oil, a release of a hazardous substance or a fire from a vessel, offshore facility, or onshore facility operating within the boundaries of the coastal and inland area of Northern Michigan. This plan addresses the response to a most probable discharge, a maximum most probable discharge and a worst-case discharge, including discharges from fire or explosion. Planning for these scenarios covers the expected range of spills possible in this area.

For purposes of this plan, the **average most probable discharge (33 CFR 155.1020; 33 CFR 154.1020)** is the size of the average spill in the area based on the historical data available. The **maximum most probable discharge (33 CFR 155.1020; 33 CFR 154.1020)** is also based on historical spill data and is the size of the discharge most likely to occur taking into account such factors as the size of the largest recorded spill, traffic flow through the area, hazard assessment, risk assessment, seasonal considerations, spill histories and operating records of facilities and transport modes (vessels, rail, etc.) in the area. The **worst-case discharge for a vessel** is a discharge of its entire cargo in adverse weather conditions **(33 CFR 155.3030; 33 CFR 155.1020).** The **worst-case discharge from a facility** is the largest foreseeable discharge in adverse weather conditions **(33 CFR 154.1020; 33 CFR 154.1029).** In addition, approximately 500 miles of oil product transmission pipelines run through this area from northwest Canada and Wisconsin through the Upper Peninsula of Michigan and Northern Lower Michigan to points south. The **worst-case discharge from a pipeline** would be its entire contents between two automatic shut-off locations as the pipeline transits along, over, under or through a navigable water or adjacent shoreline **(49 CFR 194).** Finally, over 1200 miles of railroad pass through this area. The **worst-case discharge for a rail shipment** would be the discharge of the entire contents of a unit train, for planning purposes estimated at 1,000,000 gallons.

This plan shall be used as a framework for response mechanisms to evaluate shortfalls and weakness in the response structure before an incident, and as a guide for reviewing vessel and facility response plans required by the Oil Pollution Act of 1990 (OPA 90), to ensure consistency with those requirements. The review for consistency should address, at a minimum, the economically and environmentally sensitive areas within the area, the response equipment (quantity and type) available within the area (this includes federal, state and local government equipment and industry-owned equipment); response personnel available; equipment and personnel needs compared to those available; protection strategies, etc. This plan is written in conjunction with National Oil and Hazardous Substances Contingency Plan (NCP) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

1100 AUTHORITY

Section 4202 of OPA 90 amended subsection (j) of Section 311 of the Federal Water Pollution Control Act (FWPCA) [33 U.S.C. 1321 (j)] to address the development of a National Planning and Response System. As part of this system, Section 4202 of OPA 90 called for Area Committees are to be established for each area designated by the President. These Area Committees are comprised of qualified personnel from federal, state and local agencies.

Each Area Committee, under the direction of the Federal On-Scene Coordinators (FOSCs) for the area, is responsible for developing an ACP which, when implemented in conjunction with the NCP, shall be adequate to remove a worst case discharge of oil or a hazardous substance and to mitigate a substantial threat of such a discharge, from a vessel, offshore facility or onshore facility operating in or near the geographic area. Each Area Committee is also responsible for working with state and local officials to pre-plan for joint response efforts, including appropriate procedures for mechanical recovery, dispersal, shoreline cleanup, protection of sensitive environmental areas, and protection, rescue, and rehabilitation of fisheries and wildlife. The Area Committee is also required to work with state and local officials to expedite decisions for the use of dispersants and other mitigating substances and devices.

The functions of designating areas, appointing Area Committee members, determining the information to be included in ACPs, and reviewing and approving ACPs have been delegated by Executive Order 12777 of 22 October 1991, to the Commandant of the U.S. Coast Guard (USCG) for the coastal zone and to the Administrator of the U.S. Environmental Protection Agency (EPA) for the inland zone. The coastal zone and inland zone are defined in the NCP (40 CFR 300.5) as follows: The term "coastal zone" is defined to mean all United States waters subject to the tide; United States waters of the Great Lakes; specified ports and harbors on inland rivers; and the waters of the Exclusive Economic Zone (EEZ). The term "inland zone" is defined in the NCP to mean the environment inland of the coastal zone excluding the Great Lakes and specified ports and harbors on inland rivers. Precise boundaries are determined by EPA/USCG agreements and identified in federal regional contingency plans.

USCG has designated those portions of the Captain of the Port (COTP) zones that are within the coastal zone as Areas for which Area Committees will prepare ACPs. The COTP zones are further described in USCG regulations (33 CFR Part 3). EPA has designated Sub-Areas and established Area Committees in Region 5 based upon inland zone areas close to major bodies of water, including the Great Lakes, Mississippi River and Ohio River.

1110 POLLUTION INVESTIGATION AUTHORITY

Several federal, state and local agencies have a direct role in the enforcement of applicable laws and regulations associated with a discharge, or substantial threat of a discharge, of oil or hazardous substances into the environment. Investigations into alleged violations of the many applicable laws and regulations require a coordinated effort among the agencies involved. As a preliminary step to enhance the effectiveness of investigative activities and limit the potential negative impact of these activities and the cleanup and removal actions associated with an incident, the following agencies have been identified as having a direct, field-oriented role in the initial stages of these events:

- U.S. Coast Guard
- U.S. Environmental Protection Agency
- Michigan Department of Environmental Quality
- Michigan State Police
- Michigan Department of Natural Resources

1120 GUIDING PRINCIPLES

The following general statements summarize the primary guiding principles associated with these direct, field-oriented investigations:

Investigative and response actions must interfere with each other as little as possible. Investigative efforts often involve the collection of evidence in a timely manner. This requires investigative efforts and evidence gathering during the high-intensity emergency phase of removal actions. Every effort must be made to coordinate investigative activities through the Incident Command System (ICS) to minimize the impact on response and removal efforts. Simply separating investigative and removal functions amongst distinct and different individuals or groups does little to mitigate any potential interference one activity may have on the other. Individual investigations must understand the concerns of those directing response efforts to minimize the impact of the incident on public health, welfare, and the environment.

Coordination of investigative activities is very important. Any number of mechanisms exists to coordinate efforts on-site during an incident. Periodic coordination meetings greatly enhance command, control and communications amongst different parties. Lead agencies may carry the dual role of conducting an investigation and coordinating these meetings.

Investigations into, for example, cause, liability, and violations of applicable laws and regulations are a reality. The various federal, state and local agencies discussed above will be involved in an investigative role as applicable.

Investigative roles, efforts and degree of interest will vary from incident to incident. Investigative interest and activity will be a function of the scope, size, impact, location and causes of the incident.

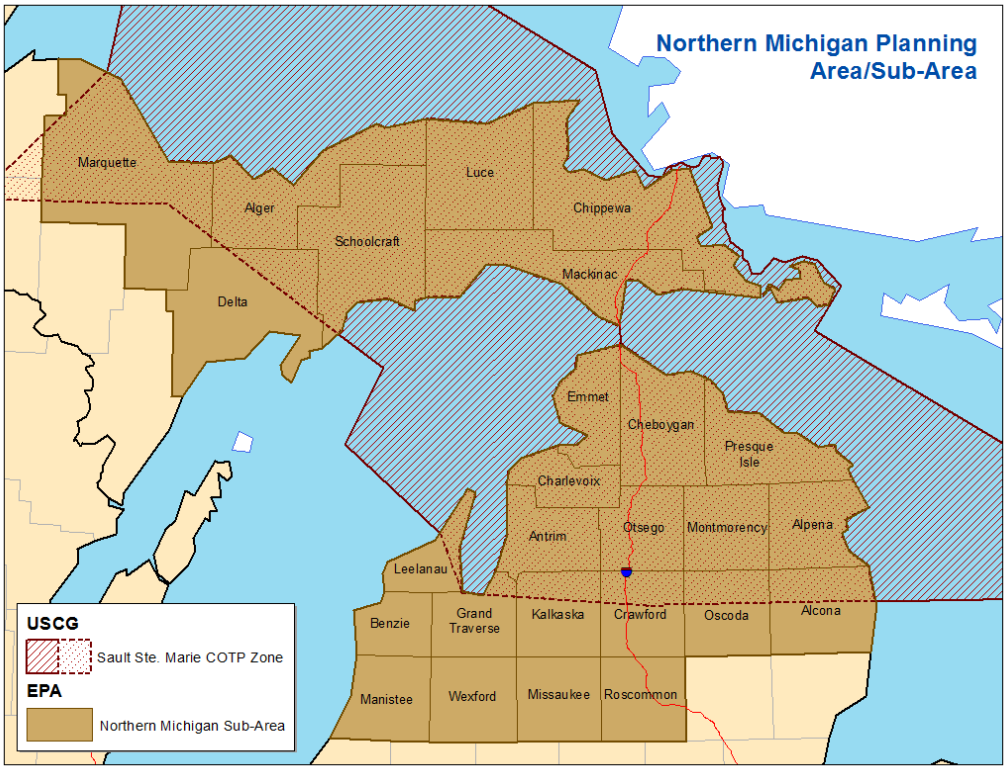
Understanding each agency's role increases the efficiency of investigative activities. There is a need for a strong commitment to develop necessary interagency understandings and working agreements that contribute towards this goal. In addition, these efforts facilitate the smooth acquisition of necessary information and evidence on an on-going basis. The emphasis on this element is to make these improvements before an incident occurs.

1200 GEOGRAPHIC BOUNDARIES

USCG Sault Sainte Marie COTP Zone: The eastern portion of the Sector Sault Sainte Marie AOR, the Sector Sault Sainte Marie COTP Zone, comprises all navigable waters of the United States and contiguous land areas within an area starting from a point at latitude 44°43'00" N on the international boundary within Lake Huron; proceeding due west to longitude 85°40'00" W; thence northwest to the eastern shore of Lake Michigan at latitude 45°01'00" N; thence northwest to latitude 45°22'30" N, longitude 86°19'00" W; thence northeast to latitude 45°41'00" N, longitude 86°06'00" W; thence northwest to latitude 46°20'00" N, longitude 87°22'00" W; thence west to 46°20'00" N, longitude 88°30'00" W; thence northeast to 47°59'23" N, longitude 87°35'10" W; thence north to a point near Manitou Island Light at latitude 47°25'09" N, longitude 87°35'10" W; thence north to 47°59'23" N, longitude 87°35'10" W; thence east along the international boundary to the starting point. The entire COTP Zone is covered by this plan.

EPA Region 5 Northern Michigan Subarea: The Region as a whole includes the following six states: Minnesota, Wisconsin, Michigan, Ohio, Illinois, and Indiana. The Northern Michigan Subarea consists of the following counties of Northern Michigan. Several are located outside the boundaries of the Sault Sainte Marie COTP Zone, but all are included in the area of responsibility covered by this plan:

Alcona	**Benzie**	**Crawford**	**Kalkaska**	**Manistee**	**Otsego**	**Wexford**
Alger	**Charlevoix**	**Delta**	**Leelanau**	**Marquette**	**Presque Isle**	
Alpena	**Cheboygan**	**Emmet**	**Luce**	**Missaukee**	**Roscommon**	
Antrim	**Chippewa**	**Grand Traverse**	**Mackinac**	**Oscoda**	**Schoolcraft**	



Geographic Description

Per the Region 5 Regional Contingency Plan, Section 1: Introductions, Subsection 1.4: Jurisdictions, the COTP Sault Ste. Marie will assume responsibility for providing FOSCs in the aforementioned area of operations for the following waters, described in more detail below: Lake Superior, the St. Marys River, portions of Lake Huron and portions of Lake Michigan. In the descriptions that follow, the term "adjoining shoreline" is taken to mean the shoreline up to and including the Ordinary High Water Mark as defined under Section 404 of the Clean Water Act: "…that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

Lake Superior: The waters, bays, tributaries, and adjoining shoreline of Lake Superior within U.S. territory, eastward from the westernmost boundary of the Area of Operations (AOR) to a line between Point Iroquois running northeast to Gros Cap Reef Light on the International Boundary. Included:

1. Houghton Canal and adjoining waters: Including Portage Lake, Torch Bay and Torch Lake
2. Ontonagon River: Upstream to the M-64/Greenland Road Bridge at Ontonagon

St. Marys River: The waters, bays, tributaries, and adjoining shoreline of the St. Marys River within U.S. territory, from a line between Point Iroquois and Gros Cap Reef Light southward to a line between Detour Reef Light and Crab Island Shoal Light, including the waters of Potagannissing Bay.

Lake Huron: The waters, bays, tributaries, and adjoining shoreline of Lake Huron within U.S. territory, northward from the southernmost boundary of the AOR, west to the Straits of Mackinaw Bridge. Included:

1. Cheboygan River (Cheboygan, MI): Upstream to the West State Street bridge
2. Thunder Bay River (Alpena, MI): Upstream to the 9th Street dam

Lake Michigan: The waters, bays, tributaries, and adjoining shoreline of Lake Michigan, eastward from the westernmost boundary of the AOR, to the Straits of Mackinaw Bridge. Included:

1. Lake Charlevoix: Upstream to the North Lake Street Bridge at Boyne City, Michigan
2. Lake Charlevoix, South Arm: Upstream to the Mill Street Bridge at East Jordan, Michigan
3. Cedar River (Menominee County, MI): Upstream to the M-35 bridge

USCG furnishes the FOSC for incidents originating in the coastal zone while EPA supplies the FOSC for incidents originating in the inland zone. It is important to note that the FOSC, while having specific responsibilities and authority under the NCP, will be part of a "Unified Command" (UC) made up of the appropriate federal, state, local, and responsible party (RP) representatives.

During incidents that require federal presence, the first USCG or EPA official on scene will assume the role of FOSC and integrate into the existing command structure established by the local or state government. If the incident occurs in the EPA zone but a USCG official is first on scene, USCG will act as the FOSC until relieved by an EPA official. If the incident occurs in the USCG zone but an EPA official is first on scene, EPA will act as the FOSC until relieved by a USCG official.

1210 RELATIONSHIP TO OTHER PLANS OR BOUNDARIES

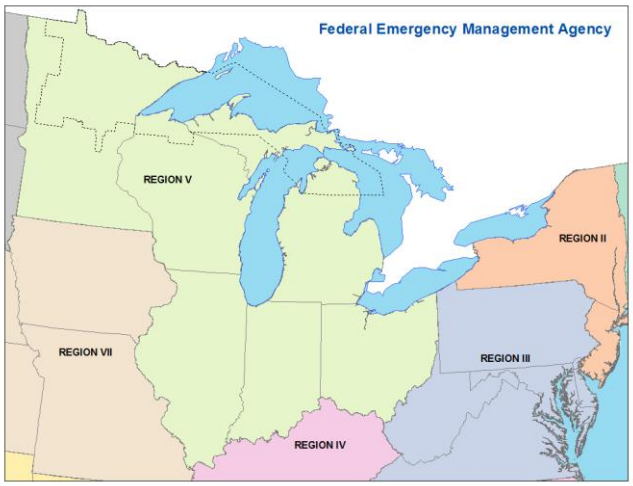
1210.1 RELATIONSHIP TO OTHER PLANS

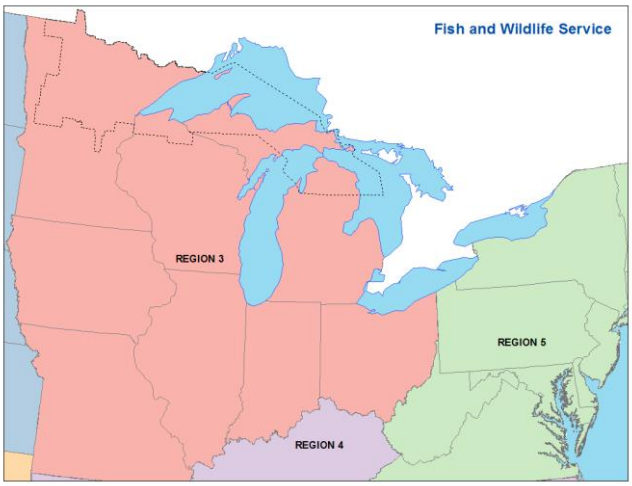
This ACP is an element of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR 300) (NCP) and enhances or is supported by the following additional contingency plans and regulations:

- National Response Framework (NRF)
- Sault Area Maritime Security Committee
- Western Lake Superior Area Contingency Plan
- Southeast Michigan Area Contingency Plan
- Sector Lake Michigan Area Contingency Plan
- Sector Lake Michigan Green Bay Quadrant Geographic Response Plan
- Sector Lake Michigan Grand Haven Quadrant Geographic Response Plan
- EPA Region 5 Oil and Hazardous Substances Regional Contingency Plan/Area Contingency Plan (RCP/ACP)
- Western Michigan Sub-Area Contingency Plan
- Southeast Michigan Sub-Area Contingency Plan
- Green Bay Sub-Area Contingency Plan
- Western Lake Superior Sub-Area Plan
- Joint U.S./Canada Marine Pollution Contingency Plan
- Joint U.S./Canadian Inland Contingency Plan
- Title III Local Emergency Response Plans
- Various Facility & Vessel Response Plans that operate in this zone

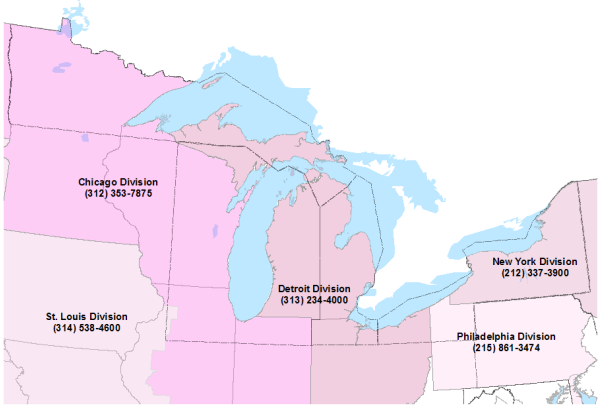
1210.2 OTHER FEDERAL JURISDICTIONAL BOUNDARIES

The following maps detail other federal jurisdictional boundaries in relation to the Sault Ste. Marie COTP Zone/Northern Michigan Sub-Area.

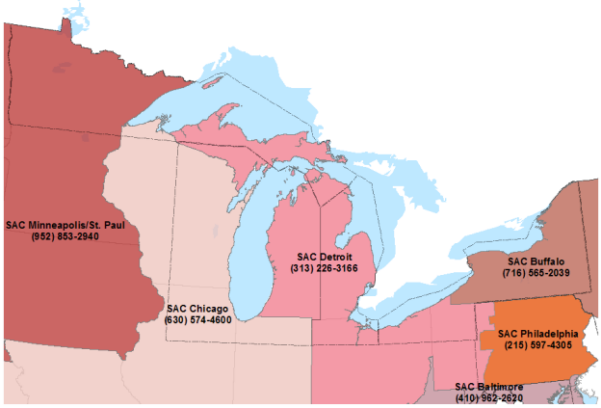




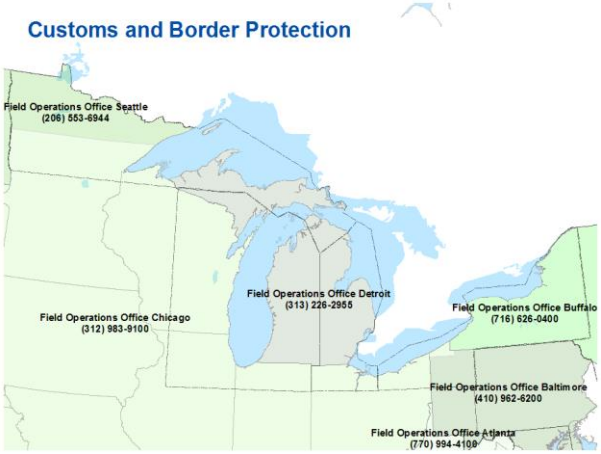
Drug Enforcement Administration



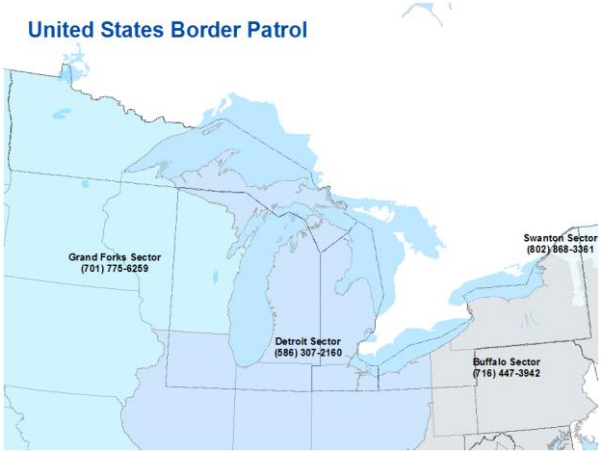
Immigration Customs Enforcement



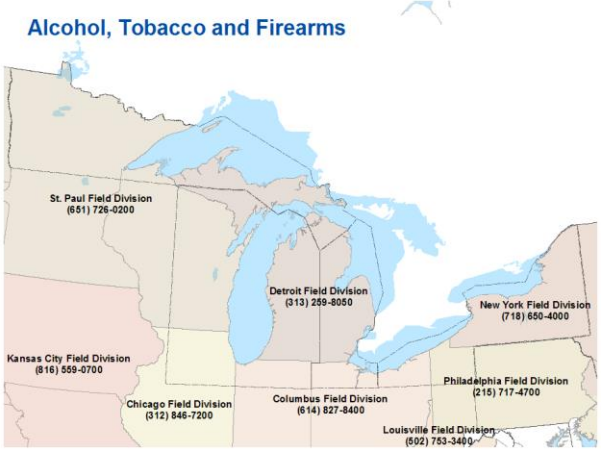
Customs and Border Protection



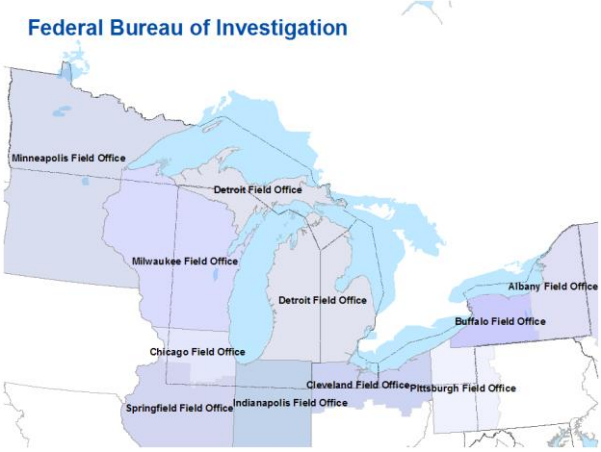
United States Border Patrol



Alcohol, Tobacco and Firearms



Federal Bureau of Investigation



1300 AREA COMMITTEE

1310 PURPOSE

The Northern Michigan Area Committee is a planning and preparedness organization, although individual members may have a response role. The planning role is required by Sections 311(a)(18) and (j)(4) of the CWA, as amended by the OPA 90 which tasks the Area Committee to prepare and submit for approval an ACP, as mandated by Sections 311(a)(19) and (j)(4) of the CWA. The USCG and EPA FOSCs and OSCs will coordinate the activities of the Area Committee. Development of a comprehensive ACP that is consistent with the NCP will take place with assistance from the Michigan State Police Division of Emergency Management and Homeland Security and the Michigan Department of Environmental Quality (MDEQ). In addition, County Emergency Management Coordinators will coordinate the activities within their respective county and participate in development of the plan.

1320 ORGANIZATION

The EPA and USCG, as chairs of the Area Committees, provide overall direction and coordination of the planning effort. The membership comes from qualified federal, state, local government personnel and organizations, and private industry that can contribute to the Area Committee. The members of the Area Committee may also fill individual functional roles in the area response organization.

1330 AREA COMMITTEE MEMBERS

Federal

- COTP Sault Ste. Marie
- U.S. EPA Region 5
- National Oceanic and Atmospheric Administration
- U.S. Army Corps of Engineers
- U.S. National Park Service (Pictured Rocks National Lake Shore)
- US Forest Service (Hiawatha National Forest)
- U.S. Fish and Wildlife Service
- U.S. Customs and Border Protection
- U.S. Pipeline and Hazardous Materials Safety Administration
- U.S. Federal Railroad Administration

State and Tribal

- Michigan Department of Environmental Quality
- Michigan Department of Natural Resources
- Michigan State Police, Division of Emergency Management and Homeland Security (Region 7 and 8)
- Bay Mills Chippewa Indian Community
- Grand Traverse Band of Ottawa and Chippewa Indians
- Little River Band of Ottawa Indians
- Little Traverse Bay Band of Odawa Indians
- Sault Ste. Marie Tribe of Chippewa Indians

- Chippewa-Ottawa Resource Authority
- Lake Superior State University

Local

- County Emergency Services:

Alcona County	Crawford County	Marquette County
Alger County	Delta County	Missaukee County
Alpena County	Emmet County	Montmorency County
Antrim County	Grand Traverse County	Oscoda County
Benzie County	Kalkaska County	Otsego County
Charlevoix County	Leelanau County	Presque Isle County
Cheboygan County	Luce County	Roscommon County
Chippewa County	Mackinac County	Schoolcraft County
Crawford County	Manistee County	Wexford County

Non-governmental

- Eastern Upper Peninsula Transit Authority
- Enbridge
- Great Lakes Captain's Association
- Mackinac Environmental Technology
- Marine Pollution Control
- Markwest Energy Partners
- Northern A-1
- Sault Ste. Marie Harbormaster
- SemFuel
- T&T Marine
- Tip of the Mitt Watershed Council
- US Oil
- UP Environmental

1330.1 SUBCOMMITTEES, TITLES AND MEMBERS

The Northern Michigan Area Committee (NMAC) consists of two co-chairpersons, a vice chairperson, an executive secretary and general membership. The NMAC co-chairs may form and dissolve ad-hoc subcommittees as required when issues need to be discussed in greater detail than what can be accomplished at an Area Committee meeting. The subcommittees listed below are standing subcommittees:

NMAC Chairman and Vice Chairman – The NMAC is established and maintained under the two FOSCs' direction; therefore, the Commander, USCG Sector Sault Ste. Marie, and the EPA FOSC, Northern Michigan Sub-Area, shall co-chair the committee. The co-chairs coordinate and assist the area committee in the development and maintenance of the ACP.

Executive Steering Committee – The Executive Steering Committee is made up of two federal, one state, one tribal, one local and one non-governmental member. This committee is responsible for the oversight and direction of the Area Committee. Under the Executive Steering Committee, the Area Committee will include three separate standing sub-committees. General membership is encouraged to participate in one or more standing sub-committee.

Exercise Sub-Committee – The Exercise Sub-Committee is responsible for maintaining the National Preparedness for Response Exercise Program (PREP). The Exercise Sub-Committee will also capture lessons learned from exercises and, where applicable, work with the plan review committee to incorporate improvements to the ACP and response preparedness.

Plan Review Sub-Committee – The ACP is a living document. Updates and revisions will be conducted by the Plan Review Sub-Committee on an ongoing basis throughout the year. Suggestions and comments about the plan are welcome at any time. A formal review will be conducted annually by the Plan Review Sub-Committee. The Plan Review Sub-Committee is responsible for maintaining the Record of Changes and updating the plan on Homeport and on the RRT website (http://www.rrt5.org). The RRT website is an internet portal maintained as an information clearinghouse for members of the RRT and the general public.

Ad-Hoc Sub-Committees – Ad-hoc sub-committees are temporary and may be established for a limited period of time to deal with issues that need to be discussed in greater detail than can be accomplished at an Area Committee meeting or within the scope of the standing sub-committees. Ad-hoc sub-committees may be established by any NMAC member's recommendation and the approval of the NMAC general membership. Examples of ad-hoc sub-committees include: sensitive area assessment, communications and notifications, and operational response.

Executive Secretary – The executive secretary is responsible for the administrative duties of the NMAC, such as maintaining designation letters, publishing meeting agendas, identifying adequate meeting locations, recording meeting minutes and maintaining current editions of the NMACP, including digital versions. Sector Sault Ste. Marie's planning department will assume this role.

Area Committee General Membership – The NMAC will not have less than seven members and will be comprised of federal, state, local and tribal agencies; stakeholders; industry representatives (facility owner/operators, shipping companies, response companies, etc.); non-government organizations; emergency response officials; marine pilot associations; academia; environmental groups; and consultants.

1400 NATIONAL AND AREA RESPONSE SYSTEMS

1410 NATIONAL RESPONSE SYSTEM

The National Response System (NRS) was developed to coordinate all government agencies with responsibility for environmental protection, in a focused response strategy for the immediate and effective cleanup of oil or hazardous substance discharges. The NRS is a tiered response and preparedness mechanism that supports the pre-designated FOSC in coordinating national, regional and local government agencies, industry, and the RP during a response.

Most local agencies that respond to emergencies utilize some form of the Incident Command System (ICS) to interface with other local agencies. In larger incidents, which oil spills can easily become, a broader Unified Command Structure (UCS) is implemented. UCS is in fact an element of ICS. They are identical with the exception of designation of the Incident Commander (IC). In ICS, one individual, usually the first arriving fire company officer, assumes the role of IC. In events with a more expansive scope, such as large oil spills, UCS is utilized. Here the federal and state OSCs, the local agency IC and the RP's Incident Manager work together to resolve the incident.

ICS and UCS provide a method for different agencies, organizations and individuals to work together toward a common goal, in an organized, productive, efficient and effective manner during emergencies. The systems consist of procedures for controlling personnel, facilities, equipment and communications during all phases of an incident. Both are designed to evolve from the time an incident begins, through initial attack and stabilization, to long-term control, and finally, to the resolution of the incident. These systems are adaptable to any type of incident, whether fire, explosion, hazardous materials release, or oil spill. Structure can be established and rapidly expanded depending on the changing conditions of the incident.

Solving any problem, especially one as complex as a major oil spill, is easier to do if broken down into parts. Under these systems the incident organization structure develops in a modular fashion based on the size of the incident. The incident's staff builds from the top down and additional sections or functions are added as required by the scope of the incident. One person usually can manage small incidents, where larger operations require independent management of the various command responsibilities. If the number of divisions and groups exceeds the IC's span of control, branches can be utilized to further organizationally divide the incident into manageable areas. Divisions and groups can be assigned to various branch directors. ICS allows response agencies to operate with a common, consistent and pre-established organizational structure and with standard operating procedures. Pre-determined standard names and terminology are used for organizational elements. Plain English is used instead of complicated codes for radio communications. Incident communications are planned, controlled and managed using a communications network.

1410.1 SONS

A Spill of National Significance (SONS) is that rare, catastrophic spill event which captures the nation's attention due to its actual damage or significant potential for adverse environmental impact. A SONS is defined as a spill which greatly exceeds the response capability at the local and regional levels and which, due to its size, location and actual or potential adverse impact on the environment is so complex, it requires

extraordinary coordination of federal, state, local and private resources to contain and clean up. As per the NCP (40 CFR 300.323), a discharge may be classified as a SONS only by the Administrator of the EPA for discharges occurring in the inland zone and only by the Commandant of the USCG for discharges occurring in the coastal zone:

> 300.323 Spills of national significance.
>
> (a) A discharge may be classified as a spill of national significance (SONS) by the Administrator of EPA for discharges occurring in the inland zone and the Commandant of the USCG for discharges occurring in the coastal zone.
>
> (b) For a SONS in the inland zone, the EPA Administrator may name a senior Agency official to assist the OSC in communicating with affected parties and the public and coordinating federal, state, local, and international resources at the national level. This strategic coordination will involve, as appropriate, the NRT, RRT(s), the Governor(s) of affected state(s), and the mayor(s) or other chief executive(s) of local government(s).
>
> (c) For a SONS in the coastal zone, the USCG Commandant may name a National Incident Commander (NIC) who will assume the role of the OSC in communicating with affected parties and the public, and coordinating federal, state, local, and international resources at the national level. This strategic coordination will involve, as appropriate, the NRT, RRT(s), the Governor(s) of affected state(s), and the mayor(s) or other chief executive(s) of local government(s).

The response to a SONS event must be a coordinated response that integrates the FOSC's response organization with the SONS response organization. If a discharge is classified as a substantial threat to the public health or welfare of the United States (40 CFR 300.320(a)(2)), or the necessary response effort is so complex that it requires extraordinary coordination of federal, state, local and RP resources to contain and clean up the discharge, the USCG Commandant or EPA Administrator may classify the incident as a SONS under the NCP.

The NCP describes the Federal government's responsibility for strategic coordination and support of FOSCs when responding to a SONS. To meet these responsibilities, USCG or EPA may establish an Area Command for their respective zone of responsibility.

As described in 40 CFR 300.323, when a SONS is declared in the inland zone, the EPA Administrator may name a senior Agency official to assist the OSC in communicating with affected parties and the public and coordinating federal, state, local, and international resources at the national level. When a SONS is declared in the coastal zone, the Commandant of the USCG may name a National Incident Commander who will assume the role of the OSC in communicating with affected parties and the public, and coordinating federal, state, local, and international resources at the national level.

If the complexity of the incident and incident management span-of-control considerations so dictate, an Area Command is established. Generally, the administrator(s) of the agency having jurisdictional responsibility for the incident makes the decision to establish an Area Command. The purpose of an Area

Command is either to oversee the management of multiple incidents that are each being handled by a separate ICS organization or to oversee the management of a very large or complex incident that has multiple incident management teams engaged. Area Command organization and functions under the National Incident Management System are described in Section 1450.1.

1420 NATIONAL RESPONSE FRAMEWORK

The NRF is a guide to how the nation conducts all-hazards response. It is built upon scalable, flexible and adaptable coordinating structures to align key roles and responsibilities across the Nation. The NRF presents the guiding principles that enable all response partners to prepare for and provide a unified national response to disasters and emergencies – from the smallest incident to the largest catastrophe. The NRF defines the key principles, roles and structures that organize the way we respond as a Nation. It describes how communities, tribes, States, the Federal Government, and private sector and non-governmental partners apply these principles for a coordinated, effective national response. The NRF is always in effect, and elements can be implemented at any level at any time.

The NRF also includes Incident Annexes that address specific categories of contingencies or hazard situations requiring specialized application of NRF mechanisms. The Incident Annexes are available on the NRF Resource Center at http://www.fema.gov/NRF. Details relating to requesting and receiving assistance, as well as the authorities under which assistance is provided, are available on the NRF Resource Center. Response Partner Guides, information on Stafford Act and non-Stafford Act assistance, all annexes, and a listing of legal authorities are available on the website.

1430 REGIONAL RESPONSE TEAM STRUCTURE

A Regional Response Team (RRT) is a Region-specific advisory group for spill response planning and preparedness activities, as well as for coordination of assistance and advice to the OSC during responses to site-specific incidents. The Co-Chairs of the Region 5 RRT are the Chief of the Emergency Response Branch, EPA Region 5; and the Chief of the Response Division, Ninth Coast Guard District. The Region 5 RRT membership includes representatives appointed by the Governor from each State and the designated regional representatives of the following agencies:

- Department of Agriculture (DOA)
- Department of Commerce (DOC)
- Department of Defense (DOD)
- Department of Energy (DOE)
- Federal Emergency Management Agency (FEMA)
- General Services Administration (GSA)
- Department of Health and Human Services (HHS)
- Department of Interior (DOI)
- Department of Justice (DOJ)
- Department of Labor (DOL)
- Nuclear Regulatory Commission (NRC)
- Department of State (DOS)
- Department of Transportation (DOT)

The principal components of the Region 5 RRT are a standing RRT and incident-specific RRTs. The standing RRT consists of designated representatives from each participating federal agency listed above and each State. Each incident-specific RRT is formed from the standing team when the RRT is activated for a response and consists of representatives of appropriate local governments, state agencies and federal agencies.

Activation of the RRT: An incident-specific RRT may be activated upon request from the OSC, or from any RRT representative, to the Co-Chair of the RRT, when a discharge or release:

- Exceeds the response capabilities available to the OSC in the place where it occurs;
- Transects state, regional and/or international boundaries; or
- Poses a substantial threat to public health or welfare, to the environment, or to regionally significant amounts of property.

Requests for RRT activation shall subsequently be confirmed in writing. Local requests for RRT activation must be made through the State RRT member. The Region 5 Regional Response Team maintains the Region 5 Regional Contingency Plan/Area Contingency Plan (RCP/ACP). More information on the Region 5 RRT and the Region 5 RCP/ACP can be found on the Region 5 RRT website at http://rrt5.org/RCPACPMain.aspx.

Current RRT Members (listed on the following pages): (Last Update June 30, 2015)

The most current Region 5 RRT Roster can be found at www.rrt5.org

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Primary Alan Kersnick Department of Defense Regional NOSC NAVFAC MIDLANT Norfolk, VA	24 hour: Office: 757-341-0449 Email: alan.kersnick@navy.mil
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Department of State (NRT/RRT Representative)	
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Department of Transportation	
Shirely McNew U.S. DOT – PHMSA Office of Hazardous Materials Initiatives & Training, Central Region 2300 East Devon Avenue, Ste. 478 Des Plaines, IL 60018	Phone: 847-294-8580 Email: shirley.mcnew@dot.gov
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State of Ohio	
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1440 AREA RESPONSE STRUCTURE

1440.1 U.S. COAST GUARD SECTOR SAULT SAINTE MARIE, MI

Captain of the Port, Sault Ste. Marie, MI is the pre-designated FOSC for oil and hazardous materials incidents in the Eastern Lake Superior, St. Marys River and Straits of Mackinac coastal zone. The FOSC commands and is supported by personnel assigned to USCG Sector Sault Ste. Marie. Sector Sault Ste. Marie's Response Department personnel respond to all oil spills in the coastal zone as the direct representative of the FOSC.

These personnel will integrate within the command structure of the local officials, providing federal resources and funding mechanism to support the removal activities. The RP, if identified, is responsible for all cleanup activities. Sector Sault Ste. Marie personnel will monitor from the Sector or the local incident command post all hazardous material releases. In the event the incident exceeds state or local response capabilities, the FOSC will call in national response resources and may assume the role of IC or serve within the UC.

1440.2 U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 5

EPA Region 5 is the pre-designated FOSC for oil and hazardous materials incidents in the Northern Michigan Sub-Area. The EPA FOSC for the Northern Michigan Sub-Area is stationed in Traverse City. Additional EPA Region 5 offices located near the Sub-Area include the regional headquarters in Chicago, IL, and satellite offices in Grosse Ile, MI. EPA FOSCs are available to respond to chemical and oil incidents from all three of these offices. In addition, EPA can provide additional contractor services at the scene of a chemical or oil incident. These services include technical assistance and clean-up contractor capabilities.

EPA and contractor personnel will integrate within the command structure of the local and state officials. If a RP is identified, they will be expected to assume all EPA and contractor cleanup costs. If no RP is identified and the scope of the oil or chemical incident exceeds local or state response capabilities while presenting an imminent and substantial threat to human health and/or the environment, the EPA FOSC can call in federal response and funding resources.

1440.3 U.S.–CANADA INTERNATIONAL AGREEMENTS

Joint Marine Pollution Contingency Plan / Joint Inland Pollution Contingency Plan. Two international plans have been adopted by Canada and the United States to provide a cooperative mechanism for ensuring appropriate preparedness for, notification of and response to any significant oil release or hazardous substance emergency along or near shared boundaries. The Canada-United States Joint Marine Pollution Contingency Plan (JMCP) and the Canada-United States Joint Inland Pollution Contingency Plan (JICP) are intended to enable and facilitate coordinated and integrated response to pollution incidents in the Great Lakes System by responsible federal, state, provincial and local agencies. They provide non-binding guidance to Canadian and U.S. federal agencies and also provide a mechanism for cooperative responses among all levels of government. The plans provide non-binding guidance to supplement the national, provincial and regional plans of the parties. They also facilitate assistance between the countries when the polluting incident is large but only affects one country.

CANUSLAK. Annex One of the JMCP (CANUSLAK) is maintained in force for the Great Lakes by the Canadian Coast Guard and USCG, in cooperation with other affected parties. CANUSLAK identifies and provides detailed Supplements for areas of high risk and of particular concern in augmentation of CANUSLAK. It is the responsibility of USCG and the Canadian Coast Guard to coordinate and to maintain the Plan and the Supplements appended thereto.

CANUSCENT. Annex III of the JICP (CANUSCENT) applies to that portion of the Canada-U.S. inland boundary between the Province of Ontario and the States of New York, Michigan and Minnesota. Responsibility for maintenance of CANUSCENT lies with Environment Canada–Ontario Region and U.S. EPA Regions 2 and 5.

1440.4 STATE ROLE IN INCIDENT RESPONSE

See Section 1110 and 1120 for State Pollution Investigation Authority and Guiding Principles. See Section 1500 for State and Local Response Systems.

1450 INCIDENT COMMAND SYSTEM (ICS)

USCG and EPA have adopted ICS as their primary response structure. The incident management system is based on an incident manager's limited span of control and a common terminology. This system is designed to allow an IC or FOSC to "grow" a response organization that is appropriate in size and scope to respond to any given pollution or hazardous materials incident.

The Homeland Security Act of 2002 and Homeland Security Presidential Directive Five (HSPD-5) "Management of Domestic Incidents," fundamentally changed how the U.S. prepares for and responds to domestic incidents. As the primary documents for implementing HSPD-5, NIMS and the NRF established a comprehensive approach to incident management and instituted a new national policy and procedures for response. NIMS ICS is a standardized, all hazard-all risk approach to managing crisis response operations as well as non-crisis events. ICS principles can be applied to all types of incidents. The Department of Homeland Security required all Federal departments and agencies to adopt and fully implement NIMS ICS by September 2005.

HSPD-5 policy is to prevent, prepare for, respond to and recover from terrorist attacks, major disasters and other emergencies, the United States Government shall establish a single, comprehensive approach to domestic incident management. The objective of the United States Government is to ensure that all levels of government across the Nation have the capability to work efficiently and effectively together, using a national approach to domestic incident management. In these efforts, with regard to domestic incidents, the United States Government treats crisis management and consequence management as a single, integrated function, rather than as two separate functions.

HSPD-5 tasking states the Secretary shall develop, submit for review to the Homeland Security Council, and administer a National Incident Management System (NIMS). This system will provide a consistent nationwide approach for Federal, State and local governments to work effectively and efficiently together to prepare for, respond to and recover from domestic incidents, regardless of cause, size, or complexity. To provide for interoperability and compatibility among Federal, State and local capabilities, the NIMS

will include a core set of concepts, principles, terminology and technologies covering ICS; multi-agency coordination systems; UC; training; identification and management of resources (including systems for classifying types of resources); qualifications and certification; and the collection, tracking and reporting of incident information and incident resources.

Title I of the Superfund Amendments and Reauthorization Act of 1986 (SARA) directed OSHA to draft a standard to protect workers and emergency responders from exposure to hazardous materials. This standard (29 CFR 1910.120) calls for the use of ICS for incident response. Two principle ICS references are the Field Operations Guide (FOG) (electronic version available for download at http://www.usfa.fema.gov/downloads/pdf/publications/field_operations_guide.pdf) and the Incident Management Handbook (IMH) (electronic version available for download at http://www.aphis.usda.gov/emergency_response/downloads/hazard/Incident%20Management%20Handbook6-09.pdf). The IMH technically replaces the FOG, but both documents are excellent references to keep and use during a response

1450.1 NIMS AND NRF ORGANIZATIONAL STRUCTURES

Incident Command Post (ICP). The field location at which the primary tactical-level, on-scene incident command functions are performed. The ICP may be collocated with the incident base or other incident facilities.

Emergency Operations Center (EOC). The physical location at which the coordination of information and resources to support incident management (on-scene operations) activities normally take place. An EOC may be a temporary facility or may be located in a more central or permanently established facility, perhaps at a higher level of organization within the jurisdiction. EOCs may be organized by major functional disciplines (e.g., fire, law enforcement, medical services), by jurisdiction (e.g., Federal, State, regional, tribal, city, county), or some combination thereof.

Area Command. Area Commands are established to (1) oversee the management of multiple incidents that are each being handled by an ICS Incident Management Team (IMT) organization, or (2) oversee the management of large or multiple incidents to which several IMTs have been assigned. Area Command has the responsibility to set overall strategy and priorities, allocate critical resources according to priorities, ensure that incidents are properly managed, and ensure that objective are met and strategies followed. Generally, the administrator(s) of the agency having responsibility over the incident make(s) the decision to establish an Area Command.

NIMS Area Commands are distinct from, and not to be confused with, USCG Area Commands or EPA Sub-Areas. For the purpose of this discussion, the term Area Command refers to the Area Command under NIMS and the NRF. Where both NIMS and USCG or EPA command structures are mentioned, an appropriate clarification is included in the text.

NIMS Area Command is generally used when there are a number of incidents in the same geographic area and of the same type, such as multiple hazardous material (HAZMAT) releases or fires, as these are the kinds of incidents that may compete for the same resources. When incidents are of different types and/or do not have similar resource demands, they are usually handled as separate incidents or are coordinated through an Emergency Operations Center (EOC). If the incidents under the responsibility of the Area

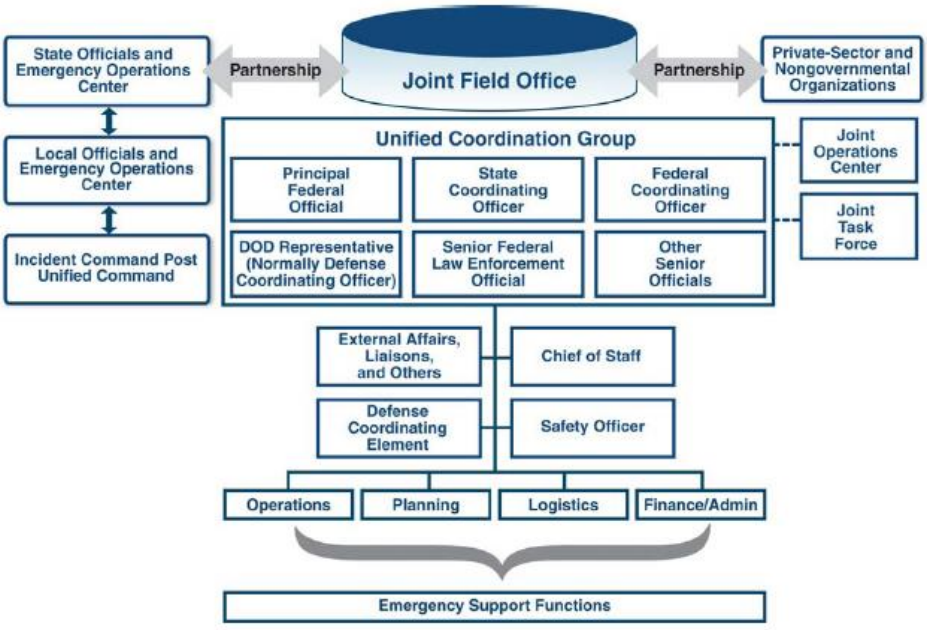
Command span multiple jurisdictions, a Unified Area Command should be established. This allows each agency or organization involved to have appropriate representation in the Area Command.

The NIMS Area Command develops an action plan detailing incident management priorities, needs and objectives. This plan should clearly state policies, objectives and priorities; provide a structural organization with clear lines of authority and communications; and identify incident management functions to be performed by the Area Command (i.e., support, public communications).

Joint Field Office (JFO). The JFO is the primary Federal incident management field structure. The JFO is a temporary Federal facility that provides a central location for the coordination of Federal, State, tribal and local governments and private-sector and nongovernmental organizations with primary responsibility for response and recovery. The JFO structure is organized, staffed and managed in a manner consistent with NIMS principles and is led by the Unified Coordination Group. Although the JFO uses an ICS structure, the JFO does not manage on-scene operations. Instead, the JFO focuses on providing support to on-scene efforts and conducting broader support operations that may extend beyond the incident site.

Personnel from Federal and State departments and agencies, other jurisdictional entities, the private sector and NGOs may be requested to staff various levels of the JFO, depending on the requirements of the incident. When incidents impact the entire Nation or multiple States or localities, multiple JFOs may be established. In these situations, coordination will occur following the principles of Unified Area Command. The physical location of such a coordination entity depends on the situation. As the primary field structure, the JFO provides the organizing structure to integrate diverse Federal authorities and capabilities and coordinate Federal response and recovery operations. For additional information on staffing and procedures see the JFO Standard Operating Procedure. The JFO is internally organized and operated using the concepts and principles of NIMS.

The figure below represents an overview of the JFO and its key components.



Unified Coordination Group. The JFO is led by the Unified Coordination Group, which is comprised of specified senior leaders representing State and Federal interests and, in certain circumstances, tribal governments, local jurisdictions, the private sector or NGOs. The Unified Coordination Group typically consists of the Principal Federal Official (if designated), Federal Coordinating Officer (FCO), State Coordinating Officer, and senior officials form other entities with primary statutory or jurisdictional responsibility and significant operational responsibility for an aspect of an incident (e.g., the Senior Health Official, Department of Defense representative, or Senior Federal Law Enforcement Official, if assigned). Within the Unified Coordination Group, the FCO is the primary Federal Official responsible for coordinating, integrating and synchronizing Federal Response activities.

Coordination between the On-scene Incident Command Post and the Joint Field Office. In a response where there is no federal presence in the UC, a FOSC will be assigned and integrated into the Unified Incident Command (UIC) as soon as practical. In situations where there is a federal presence in the UC (such as terrorist incidents and oil/hazmat releases), the JFO will coordinate directly with the Unified Command/Area Command. For an effective response, the JFO and the on-scene Incident Command must work together in a cooperative environment. Coordination will take place both at the senior level (i.e., between the UC and JFO Coordination Group) and at the staff levels (e.g., between the Incident Command Post (ICP) Planning Section and the JFO Planning Section, Safety Officer and Safety Coordinator, etc.). Based on the incident objectives and Incident Action Plan (IAP) established by the UC, the JFO establishes broader objectives and creates a Coordination Plan. While developing the broader objectives and Coordination Plan, the JFO Coordination Group must also consider the national strategy and concerns of the Interagency Incident Management Group (IIMG). The Coordination Plan includes objectives established by the JFO Coordination Group, synopsis of agency and Incident Command actions, assigned coordination activities, information-sharing procedures, and a safety plan.

To facilitate cooperation, the on-scene UC should provide the JFO with:

- Incident priorities;
- Copy of IAP per operational period;
- Progress updates along with hindrances;
- Critical needs/Critical resource shortfalls (and impact of not receiving required resources);
- Political, social, economic and environmental impacts;
- Long term projections;
- Contact directory; and
- Meeting schedules.

The Joint Field Office should provide the on-scene UC with:

- Status of resources that were requested;
- Addresses resource and policy issues raised by the UC;
- Synchronizes planning cycle with UC planning cycle, as appropriate;
- Distributes an overall contact directory; and
- Provides copy of the Coordination Plan.

Emergency Support Functions (ESF). ESFs provide the structure for coordinating Federal interagency support for a Federal response to an incident. They are mechanisms for grouping functions most

frequently used to provide Federal support to States and Federal-to-Federal support, both for declared disasters and emergencies under the Stafford Act and for non-Stafford Act Incidents

ICS provides for the flexibility to assign ESF and other stakeholder resources according to their capabilities, tasking, and requirements to augment and support the other sections of the JFO/Regional Response Coordination Center (RRCC) or National Response Coordination Center (NRCC), in order to respond to incidents in a more collaborative and cross-cutting manner.

While ESFs are typically assigned to a specific section at the NRCC or in the JFO/RRCC for management purposes, resources may be assigned anywhere within the Unified Coordination structure. Regardless of the section in which an ESF may reside, that entity works in conjunction with other JFO sections to ensure that appropriate planning and execution of missions occur. Detailed NRF ESF information is available at: http://www.fema.gov/emergency/nrf/siteindex.htm. The below table is an excerpt from the NRF identifying ESF Coordinator and Primary and Support Agencies.

ESF COORDINATING, PRIMARY, AND SUPPORT DESIGNATIONS

Table 2. Designation of ESF Coordinator and Primary and Support Agencies

	Emergency Support Functions														
Agency	#1 - Transportation	#2 - Communications	#3 - Public Works and Engineering	#4 - Firefighting	#5 - Emergency Management	#6 - Mass Care, Emergency Assistance, Housing, and Human Services	#7 - Logistics Management and Resource Support	#8 - Public Health and Medical Services	#9 - Search and Rescue	#10 - Oil and Hazardous Materials Response	#11 - Agriculture and Natural Resources	#12 - Energy	#13 - Public Safety and Security	#14 - Long-Term Community Recovery	#15 - External Affairs
USDA			S		S	S	S	S		S	C/P/S	S		P	S
USDA/FS	S	S	S	C/P		S	S	S	S	S			S		
DOC	S	S	S	S	S		S	S	S	S	S	S	S	S	S
DOD	S	S	S	S	S	S	S	S	P	S	S	S	S	S	S
DOD/USACE	S		C/P	S		S	S	S	S	S	S	S	S	S	
ED					S										S
DOE	S		S		S		S	S		S	S	C/P	S	S	S
HHS			S		S	S	S	C/P	S	S	S			S	S
DHS	S	S	S		S		S	S	S	S	S	S	S	P	C
DHS/FEMA	S	P	P	S	C/P	C/P/S	C/P	S	C/P	S	S			C/P	P
DHS/NCS		C/P					S					S			
DHS/USCG	S		S	S				S	P	P			S		
HUD					S	S								P	S
DOI	S	S	S	S	S	S	S	S	P	S	P/S	S	S	S	S
DOJ	S				S	S		S	S	S	S		C/P		S
DOL			S		S	S	S	S	S	S	S	S		S	S
DOS	S		S	S	S			S		S	S	S			S

C = ESF coordinator P = Primary agency S = Support agency

Note: Components or offices within a department or agency are not listed on this chart unless they are the ESF coordinator or a primary agency. Refer to the ESF Annexes for details.

USCG and EPA Roles Relative to ESFs:

ESF #1 – Transportation.
The ESF Coordinator and primary agency for ESF #1 is the Department of Transportation. DHS is a

support agency. The Department of Homeland Security identifies and arranges for the use of USCG assets and resources in support of the ESF–1 mission. ESF #1 plays a significant role in the repair and recovery of transportation systems. If this ESF is activated, the cognizant USCG District Commander will arrange resource support as available. Staffing this ESF by District personnel will depend on the magnitude of the incident. Staffing support from other Districts should be considered.

ESF #3 – Public Works and Engineering.
Department of Defense/U.S. Army Corps of Engineers is designated as the ESF coordinator and primary agency for ESF #3. As a support agency, USCG may be called upon to coordinate the marking and removal of obstructions declared to be hazards to navigation and provide assistance in debris and contaminated debris management activities when debris or runoff impact navigable waters. This includes coordinating and/or providing resources, assessments, expertise, technical assistance, monitoring, and other appropriate support.

ESF #4 – Firefighting.
The Department of Agriculture/Forest Service is the ESF coordinator and primary agency for ESF #4. Staffing for this ESF would be provided by DHS. USCG provides support for marine firefighting incidents. Marine firefighting support includes USCG resources, technical expertise, as well as implementing a port's Marine Fire Fighting Contingency Plan. This support would be operational in nature in that any USCG support would most likely be immediately requested of the MSO or Sector. No ESF staffing is expected.

ESF #8 – Public Health and Medical Services.
The Department of Health and Human Services is the ESF coordinator and primary agency for ESF #8. DHS, through ESF #1, identifies and arranges for the use of USCG aircraft and other assets in providing urgent airlift and other transportation support. No direct ESF staffing is expected. Requests for USCG assets should be made through the cognizant District Commander.

ESF #9 – Search and Rescue.
The ESF coordinator and primary agency for ESF #9 is DHS-FEMA. DHS-USCG and the DOI is also a primary agency for ESF #9. The USCG assists in water rescue in areas of inundation and provides aircraft and boat assets. In the event the incident involves damaged buildings with hazardous materials or hazardous environments, the National Strike Force may be requested in support of this ESF, or through ESF #10, if activated. In cases of widespread flooding where this ESF has been established and long-term USCG support of the operation is envisioned, the cognizant District should directly staff this ESF (most likely collocated with the JFO).

ESF #10 – Oil and Hazardous Materials Responses.
The EPA is ESF #10 coordinator and a primary agency. The USCG can also be a primary agency. The lead for ESF #10 is based on EPA and USCG FOSC jurisdictions, which are delineated in Regional and Area Contingency Plans. An ESF #10 activation could be the result of a Stafford Act declaration, terrorism incident, or if warranted, complex oil or hazardous material releases that may or may not be considered Incidents of National Significance. The NRF Oil and Hazardous Material Annex addresses those oil and hazardous material Incidents of National Significance that are managed through concurrent implementation of the NRF and the NCP, but are not ESF #10 activations. For any oil or hazardous substance release, the NCP and its supporting plans will be utilized. The most likely activations of this

ESF would be for a natural disaster that has significant oil and/or hazardous material contamination or a terrorism-involved hazardous substance incident(s). In either case, if the response and recovery area is within the USCG FOSC area of responsibility, USCG must provide leadership of this ESF. For incidents that impact both Coast Guard and EPA jurisdictions, EPA may lead this ESF and USCG will serve as deputy.

ESF #13 – Public Safety and Security.
The Department of Justice is the ESF coordinator and the primary agencies for ESF #13. The USCG provides support within this ESF through its authorities under the Ports and Waterways Safety Act (PWSA), Magnuson Act (50 U.S.C. 191), and Maritime Transportation Safety Act (MTSA) of 2002 authorities and resources. This includes coordination of local maritime security planning efforts, the application of various port security plans, establishment of safety and security zones, and control of vessel movement. USCG is also tasked to provide certain specialized rapid response forces for maritime interdiction and law enforcement, detection of weapons of mass destruction, commercial port protection and anti-sabotage, and other maritime security activities. ESF #13 will require District staffing to ensure mission assignments are carried out expeditiously and that USCG operational activities are monitored and relayed. Supplemental staffing with subject matter experts may also be appropriate if specialized capabilities are required.

National Response Framework Components.
The following text summarizes the content of NRF annexes:

NRF Incident Annexes. The Incident Annexes describe the concept of operations to address specific contingency or hazard situations or an element of an incident requiring specialized application of the *Framework*. The overarching nature of functions described in these annexes frequently involves either support to or cooperation of all Federal departments and agencies involved in incident management efforts to ensure seamless integration of and transitions between preparedness, prevention, response, recovery and mitigation activities.

NRF Support Annexes. The Support Annexes describe how Federal departments and agencies, the private sector, volunteer organizations and NGOs coordinate and execute the common support processes and administrative tasks required during an incident. The actions described in the Support Annexes are not limited to particular types of events, but are overarching in nature and applicable to nearly every type of incident. In addition, they may support several ESFs. The Support Annexes provide a starting point to understand support needed under the *Framework.* Further assessment is required to evaluate essential local, tribal, State, Federal and private-sector resources needed to execute the capabilities specified by the *National Preparedness Guidelines*.

Training. Training will continue to be conducted in accordance with existing program guidance. Incident Command System training will be in accordance with *United States Coast Guard National Incident Management System (NIMS) and the National Response Framework (NRF).*

Exercises. Exercises will continue to be conducted in accordance with existing program guidance, including the PREP Guidelines. Specific elements of the SONS program will be exercised but may be incorporated into certain Top Officials (TOPOFF) exercises. Spill of National Significance exercises can occur on a biannual or triennial basis depending on their relationship to other national level exercises.

Funding Mechanisms. The NRF does not create any new funding sources. The primary emergency response funding mechanisms are the Oil Spill Liability Trust Fund (OSLTF), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/SUPERFUND, and the Robert T. Stafford Disaster Relief and Emergency Assistance Act. Absent the use of these three funding mechanisms, agencies are expected to support any NRF incident or operation from their own budgets.

Fund Management. Fund management for NRF incidents where USCG provides personnel, equipment, or support shall follow existing policy as stated below. It is imperative that USCG operational commanders are familiar with the National Pollution Funds Center (NPFC) User Reference Guide and the USCG Marine Safety Manual Vol. 9, COMDTINST 16000.14.

Commandant (CG-83) manages any funding received for:

- ESFs #1 through #9 and #11 through #15;
- Any NRF Support Annexes;

NRF Incident Annexes specified below:

- Biological Incident
- Catastrophic Incident
- Cyber Incident
- Food and Agriculture Incident
- Nuclear/Radiological Incident
- Terrorism Incident Law Enforcement and Investigation

The NPFC manages funding received for:

- ESF #10 – Oil and Hazardous Materials Response Annex

The NPFC will continue to manage funds from the pollution trust funds under the NCP.

PLANS UNDER THE NATIONAL RESPONSE FRAMEWORK. Figure 1 (next page) depicts how the primary incident management and security plans support and relate to one another; and, ultimately support the NRF. The vast majority of incidents USCG manages are covered by existing plans and do not rise to the level of the NRF. The NRF comes to bear only during Incidents of National Significance.

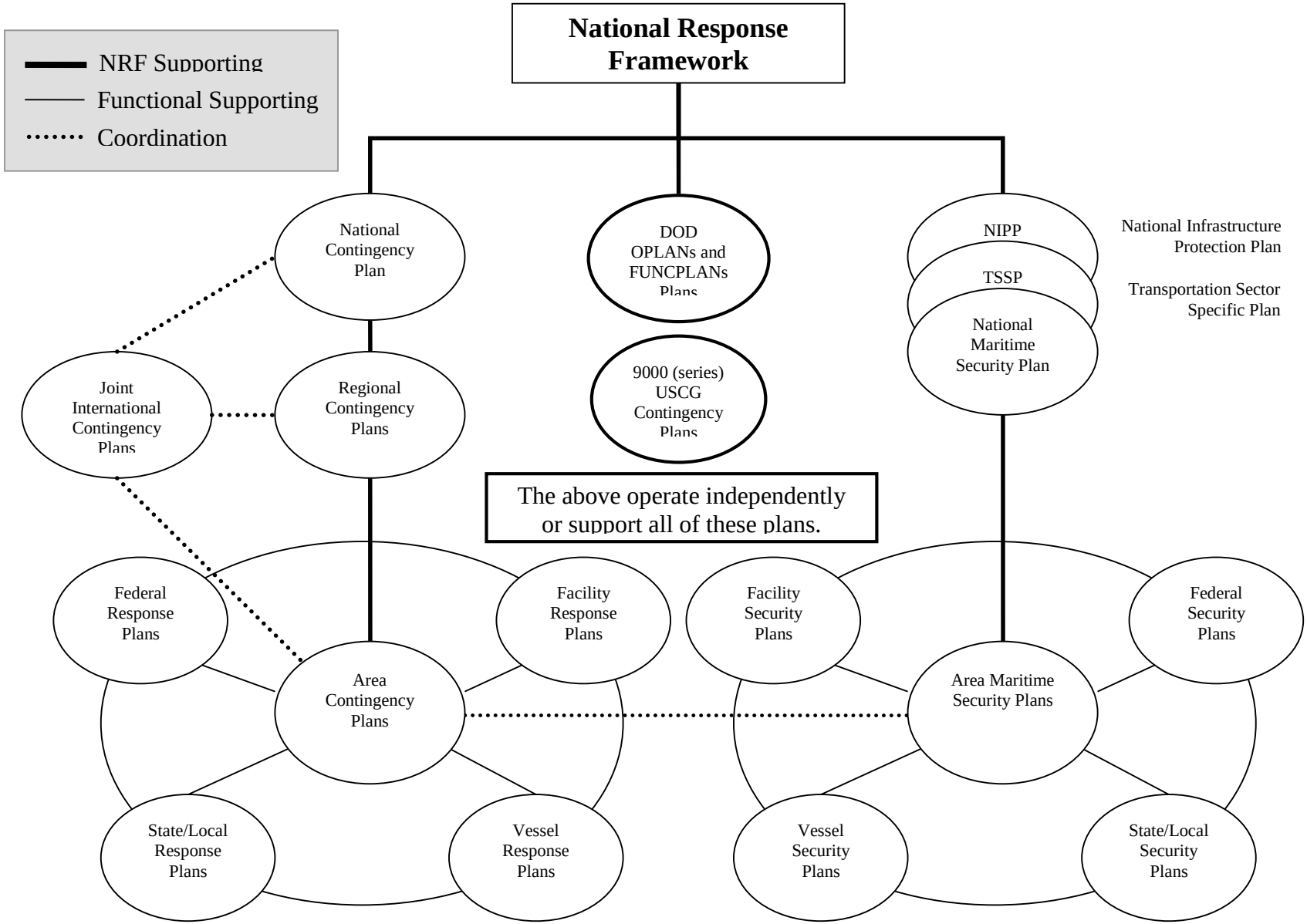


Figure 1: NRF Relationships.

1450.2 SAR PROCEDURES IN RELATION TO NIMS

Search and Rescue (SAR) efforts primarily focus on finding and assisting persons in actual or apparent distress and are carried out within a well defined SAR response system as per reference (a-d) of USCG Incident Management Handbook (IMH) – Chapter 18 Search and Rescue. These references have their basis in international law that U.S. SAR services are obligated to follow and have practical benefits that are intended to maximize the effectiveness of SAR operations, particularly when working with other military services, SAR authorities of other nations, and with ships or aircraft at sea.

When an emergency warrants responses in addition to SAR, the NIMS Incident Command System (ICS) organizational structure shall be used for overall response management IAW references (e) and (f) of Chapter 18 of the USCG IMH. Examples of activities which are not SAR but closely related include: search and recovery, salvage, investigation, fire-fighting, pollution response, etc.

For incidents that actually or potentially involve both SAR and non-SAR response activities the SAR mission coordinator (SMC), who is designated by the SAR response system will initiate action and coordinate the overall SAR response iaw IMH Chapter 18 references (a-d).

In general, USCG personnel with SAR responsibilities should receive sufficient NIMS ICS training to enable them to carry out their respective duties in ICS response organizations.

1450.3 STRUCTURE FOR NRF COORDINATION

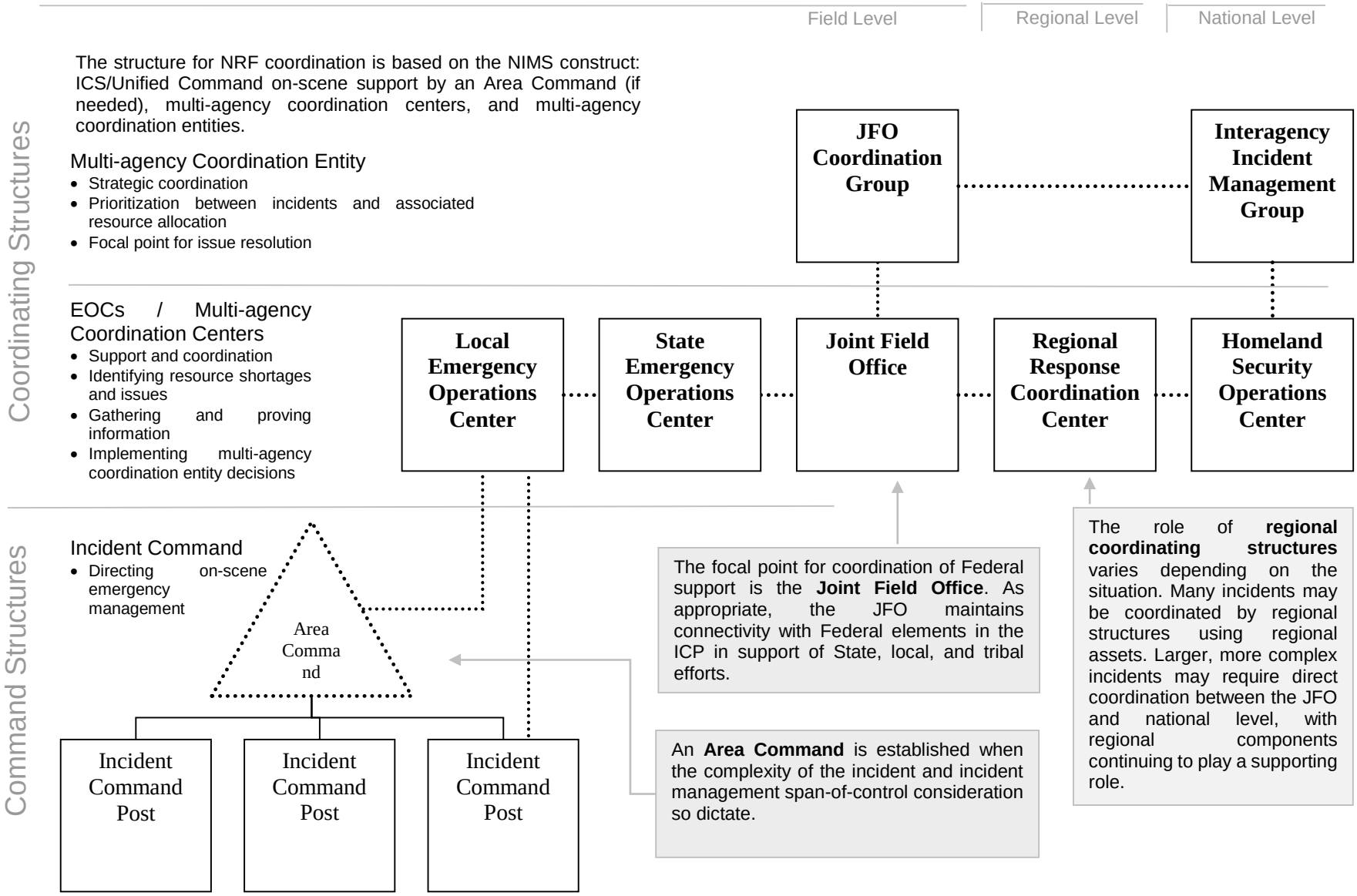


Figure 2 Coordinating structures from the National Response Framework

1460 AREA EXERCISE MECHANISM

Opportunities to exercise this plan and components of this plan are provided by the National Preparedness for Response Exercise Program (PREP). The PREP guidelines apply to facilities, vessels and pipelines. The PREP was developed to establish a workable exercise program which meets the intent of OPA 90 for spill preparedness. PREP was developed to provide a mechanism for compliance with exercise requirements while being economically feasible for the government and oil industry to adopt and sustain. PREP is a unified federal effort and satisfies the exercise requirements for all federal agencies, which adheres to its guidelines. PREP represents the minimum guidelines for ensuring adequate response preparedness. Guidelines for PREP participation became effective January 1, 1994.

The Area exercises are divided into two classification categories: internal and external. The internal exercises are:

- Notification Exercise (quarterly), PREP 7-2;
- Spill Management Team Tabletop Exercises (annually) PREP 7-4
- Equipment Deployment Exercises (annually), PREP 7-6

The external exercises are government-led Area Exercises and industry-led Area Exercises. They are on a triennial cycle for each area, alternating government-led and industry-led each time. The OSC is responsible for planning, designing and executing the internal exercises. USCG Headquarters (CG-535), Office of Contingency Exercises, and EPA Office of Emergency Management are responsible for scheduling the external exercises. The appropriate OSC remains involved in the planning, design and execution of the government-led Area Exercises. The OSC will consult in exercise development and will participate as appropriate in the industry-led Area Exercises.

The scope and objectives of internal and external Area Exercises are detailed in the PREP guidelines. Members of the Area Committee and response community will be involved in each type of exercise to some degree, varying from the confirmation of a phone number to assisting in the design of a scenario and performing as a controller or evaluator of the exercise. Participating in the PREP and utilization of the PREP guidance will ensure that all federal exercise requirements mandated by OPA 90 have been met.

Commercial vessel and facility response plan holders are required to meet the pollution response exercise requirements under OPA 90. Although participation in the PREP satisfies these requirements, PREP is a strictly voluntary program. Plan holders are not required to follow the PREP guidelines and, if they choose not to, may develop their own exercise program that complies with the regulatory exercise requirements. Area Contingency Plan holders (USCG/EPA) are required to follow PREP guidelines.

The PREP Guidelines outline the frequency and types of exercises plan holders should conduct to meet the exercise requirements of the appropriate response plan regulations and how plan holders can take credit for internal exercises when they respond to an actual incident.

1500 STATE/LOCAL RESPONSE SYSTEMS

State and local public safety agencies are ordinarily the first government representatives at the scene of a discharge or release. They are expected to initiate public safety measures that are necessary to protect public health and welfare and that are consistent with containment and cleanup requirements as stated in the NCP. Michigan has emergency management and environmental departments within its government. The health, safety and welfare of each state's citizens and natural resources are of paramount concern. Michigan is responsible for the control of pollutants that may impact the air, waters and lands within the state.

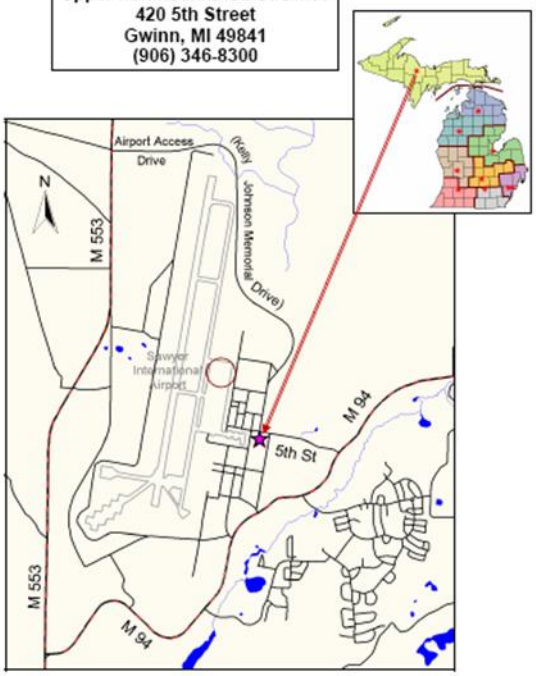
1510 MICHIGAN

Michigan Department of Environmental Quality

Michigan Department of Environmental Quality (MDEQ) is the primary environmental emergency response agency in the state. MDEQ administers programs and enforces laws that protect public health and promote the appropriate use of, limit the adverse effects on, and restore the quality of the environment. The Upper Peninsula District Office, in Gwinn, MI, covers all Michigan areas within the Upper Peninsula of Michigan as it relates to Sault Ste. Marie's COTP zone. The Cadillac District Office, in Cadillac, MI, covers all Michigan areas within the Northern Lower Peninsula of Michigan as it relates to Sault Ste. Marie's COTP zone. A field office is located in Gaylord, MI.

MDEQ has personnel located in eight Field Operations Districts, which are situated throughout the state. The primary response role of MDEQ is one of technical advisor. These personnel are responsible for complaint investigation and emergency spill response and generally oversee the environmental aspects of spill containment, control and mitigation. Appropriately trained staff within MDEQ can provide hands-on response with absorbents and skirt boom if the situation requires this type of response. It is anticipated, however, that local units of government and the various Hazardous Material Response teams located throughout the state, although predominantly in the lower third of the peninsula, will conduct all "first responder" response. Environmental mitigation associated with material spills will generally be conducted by the RP. If the RP cannot be identified or is reluctant to adequately address mitigation needs, the state can hire contractors to perform the mitigation. A limited amount of money is available through funds administered by the MDEQ Remediation and Redevelopment Division. The state can also access the Federal Fund administered under OPA 90 in accordance with federal guidelines and regulations. The State of Michigan has a responder immunity act. MDEQ, in conjunction with the Department of Attorney General, is the designated Natural Resources Trustee for the state. More information on MDEQ can be found at the following website: http://www.michigan.gov/deq

Upper Peninsula District Office
420 5th Street
Gwinn, MI 49841
(906) 346-8300



Cadillac District Office
120 W. Chapin St.
Cadillac, MI 49601-2158
(231) 775-3960

Gaylord Field Office
2100 West M-32
Gaylord, MI 49735-9282
989-731-4920

MDEQ Offices and Contacts		
Michigan Pollution Emergency Alert System (PEAS)	24 hr Emergency Notification: Non-emergency Assistance:	1-800-292-4706 1-800-662-9278
Director, Michigan Department of Environmental Quality (MDEQ)	Dan Wyant wyantd@michigan.gov	517-284-6700
Chief, MDEQ Water Resources Division	Bill Creal crealw@michigan.gov	517-284-5567
Chief, MDEQ/MDNR Law Enforcement Division	Gary Hagler haglerg@michigan.gov	517-284-6017
MDEQ Field Operations Section – Lakes Michigan and Superior	Mike Masterson mastersonm@michigan.gov Mike Worm wormm@michigan.gov	517-243-4045 616-350-3395
MDEQ Water Quality Unit Upper Peninsula District Office (Marquette, Michigan)	Chris Conn concc@michigan.gov Main Office Number	906-202-1439 906-228-4653
MDEQ Water Quality Unit Cadillac District Office (Cadillac, Michigan)	Brian Jankowski Main Office Number	231-429-0982 231-775-3960
MDEQ Water Quality Unit Gaylord Field Office (Gaylord, Michigan)	Joe Haas Main Office Number	989-705-3450 989-731-4920

Michigan Department of Natural Resources

The Michigan Department of Natural Resources (MDNR) is the lead agency for the state in decisions involving fish and wildlife issues during a spill response working cooperatively with MDEQ State OSC. MDNR enforces Michigan's hunting, fishing and natural resource laws and regulations. Their conservation officers are fully commissioned law enforcement officers who are responsible for protection of all natural resources and the environment, as well as the health and safety of the public. There are three MDNR Operations Service Centers within COTP Sault Ste. Marie Zone. Locations are Marquette, Newberry, and Gaylord, Michigan. Additional information on MDNR can be found at the following website: http://www.michigan.gov/dnr/

MDNR Offices and Contacts		
Director, MDNR (Lansing, MI)	Keith Creagh dnr-director@michigan.gov	517-284-6367
Chief, MDEQ/MDNR Law Enforcement Division	Gary Hagler haglerg@michigan.gov	517-284-6017
Upper Peninsula Field Deputy (Baraga, MI)	Wade Hamilton hamiltonw2@michigan.gov	231-922-5280
Emergency Management Division (Lansing, MI)	Jen Wolf wolfj1@michigan.gov	517-284-6231
Marquette Operations Service Center		906-228-6561
Newberry Operations Service Center		906-293-5131
Gaylord Operations Service Center		989-732-3541

Gwinn Field Office		906-346-9201
Naubinway Field Office		906-447-6048
Sault Ste. Marie Field Office		906-635-6161
Shingleton Field Office		906-452-6236

Michigan State Police

The Michigan State Police (MSP) Emergency Management and Homeland Security Division (EMHSD) serves as the designated emergency/disaster response coordination agency for the state and as the primary state contact point in the event of a declared disaster resulting in the activation of the State Emergency Management Plan. MSP as a department in the Michigan State Government, has statewide law enforcement and public safety authority and is charged with a very broad spectrum of responsibility, spanning from traffic safety through all types of criminal investigations to emergency management and homeland security. The Homeland Security Coordinator is in Lansing, MI and the Emergency Management Coordinators with responsibility within COTP Sault Ste. Marie Zone are based in Marquette and Gaylord, Michigan. Within the COTP Sault Ste. Marie Zone there are Posts in Negaunee, Munising, Newberry, Sault Ste. Marie, St. Ignace, Gaylord, Petoskey, and Cheboygan, Michigan. More information on MSP can be found at the following website: http://www.michigan.gov/msp.

MSP Offices and Contacts		
Michigan State Police Emergency Operations Center	24 hr Emergency Notification	1-800-292-4706
Commander, MSP Emergency Management & Homeland Security Division	Capt. Chris Kelenske	517-333-5042
EMHSD Coordinator, District 8 (Marquette)	Lt. Don Brown brownd43@michigan.gov	906-225-7030
EMHSD Coordinator, District 7 (Gaylord)	Lt. Michael de Castro decastrom@michigan.gov	989-705-3805
MSP 8th District Headquarters (Marquette)	Capt. John Halpin	906-225-7030
Negaunee Post #81		906-475-9922
Sault Ste. Marie Post #82		906-632-2217
St. Ignace Post #83		906-643-7582
MSP 7th District Headquarters (Gaylord)	Capt Robert Lesneski	989-705-3800
Cadillac Post #71		231-779-6040
Houghton Lake Post #72		989-422-5103
Gaylord Post #73		989-732-2778
Alpena Post #74		989-354 4101

Michigan Emergency Management Assistance Compact (MEMAC)

The Michigan Emergency Management Assistance Compact (MEMAC) is a statewide mutual-aid assistance compact authorized under 1976 PA 390, as amended, that allows participating jurisdictions to render or receive assistance in time of crisis and share vital public safety services and resources more effectively and efficiently. MEMAC is designed specifically for those situations in which a participating jurisdiction has exhausted its local resources (including those available through local / regional mutual aid or reciprocal aid compacts or agreements), or its resources are inadequate or overwhelmed in response to a threat or event being faced, and it requires additional resources (provided in a timely manner) to protect public health and safety, property or the environment.

The MSP/EMHSD administers MEMAC on behalf of the state of Michigan and is responsible for processing requests for resources by participating jurisdictions. Requests for assistance under MEMAC by a participating jurisdiction are communicated to the MSP operations center, which then notifies EMHSD of the request. MSP/EMHSD processes the request by conducting a search of available and relevant resources, contacting other participating jurisdictions or mobilizing state assets for assistance, and coordinating the mobilization of the assistance. MSP/EMHSD also administers the reimbursement process between the requesting and assistance-providing jurisdictions in accordance with the procedures established in the Compact.

Michigan Department of Agriculture

The Michigan Department of Agriculture (MDA) is the lead agency in spill response involving agricultural chemicals and/or fertilizers other than spills to Waters of the State (WOS) of Michigan. The primary State response agency for spills of agricultural chemicals and/or fertilizers to WOS is the MDEQ. The mission of MDA is, "To protect, promote and preserve the food, agricultural, environmental and economic interests of the people of Michigan." Additional information on MDA can be found at: http://www.michigan.gov/mda.

Michigan Emergency Response Commission

The Michigan Emergency Response Commission (MERC) is the primary coordination agency and liaison with the Local Emergency Planning Commissions (LEPCs) throughout the state. MERC is co-chaired by MSP-EMHSD and MDEQ.

1520 COUNTY EMERGENCY MANAGEMENT SYSTEMS

Most County Emergency Management Systems consist of a manager of the incident, an *all-hazard emergency mitigation plan*, single points of contact at each level of government and within each department, and utilization of an EOC whenever an incident occurs requiring the coordination of local agencies. The designation of the Incident Commander (IC), the extent of coordination necessary, and the type of emergency coordination facility to be established depends on the nature and severity of the incident. The designated Incident Commander works within this emergency management system in implementing this emergency operations plan, relating standard operating procedures, and responding to the incident scene. Capabilities of the local agencies that respond to pollution incidents vary from county to county. Many of the counties participate in planning, coordination and notification activities associated with hazardous chemical spills and other emergencies, including natural disasters. Traditional

field response capabilities of fire and police departments, including traffic control, communications, and equipment support, are often useful during responses. County EMC contacts are listed in Section 5220.

1520.1 ALCONA COUNTY, MI

Reserved for Alger County.

1520.2 ALGER COUNTY, MI

Reserved for Alger County.

1520.3 ALPENA COUNTY, MI

Reserved for Alpena County.

1520.4 ANTRIM COUNTY, MI

Reserved for Antrim County.

1520.5 BENZIE COUNTY, MI

Reserved for Alger County.

1520.6 CHARLEVOIX, CHEBOYGAN, EMMET COUNTIES (CCE)

Consolidated Dispatch Center.
For local emergencies that can and are handled through the activation of individual agency's (jurisdiction) resources, the Incident Command system is used. SOP procedures call for standup of mutual aid departments in the event that the IC needs them. As CCE is a consolidated dispatch center serving three counties, the IC can have any or all of the participating agencies or jurisdiction's resources.

For certain calls, the EMC is contacted by the 911 center. These calls typically include major events for which the EMC's technical assistance may be needed, or for which the EOC may be needed.

Each of these counties is unique. The capacity to meet the target capabilities necessary to respond to and recover from a specific threat or incident varies depending upon resources available, mutual aid agreements and level of training. For this reason, CCE has chosen to take the EAG approach for county emergency plans. Key players will be assembled with the requisite expertise to draft the incident action plan. Chief elected officials participate in the decision making process and have a high degree of confidence in the recommendations of staff.

The following section is an excerpt from the Emergency Action Guidelines of Charlevoix, Cheboygan, and Emmet Counties. Additional information on these counties can be found at the following websites:

Charlevoix County: http://www.charlevoixcounty.org/
Cheboygan County: http://www.cheboygancounty.net/pages/home/
Emmet County: http://www.co.emmet.mi.us/.

Response Procedures and the Disaster Declaration Process.

Generally, police, emergency medical and fire services are first to respond to an emergency or disaster. They initially analyze the situation and determine the appropriate response.

If routine response is necessary, the incident is generally handled within any of these three agencies, often working together. If the incident requires the involvement and coordination of various agencies or requires a somewhat unique response, the Emergency Management Coordinator (EMC) may become involved.

The EMC keeps the Chief Executive and the municipality liaisons informed.

The Chief Executive is responsible for coping with emergency or disaster situations that affect the jurisdiction. The EMC assists the Chief Executive in managing the overall response.

The EMC may recommend that a "local state of emergency" be declared by the Chief Executive Official. This declaration provides certain authorities as described in the local resolution and Public Act 390, of 1976, as amended. A "Local State of Emergency" is terminated by the Chief Executive Official after a period not exceeding *seven days* except with the consent of the governing body of the county or municipality.

Local government and other agencies included in this plan are mobilized as necessary to mitigate the incident.

Unless previously agreed upon in written Mutual Aid Agreements, if a municipality requests county resources, the county will provide them and absorb the cost. If the county requests the use of municipal resources, the municipality will provide them and absorb the cost.

Existing agencies of local government, other local agencies, volunteer agencies and the private sector, augmented by State and Federal agencies, constitute the basic response framework. Some of these agencies must perform special activities related to response and recovery. Individuals designated to perform these activities are detached from their regular assignment when activated. Mutual aid agreements are also relied upon.

Continuity of Government.

It is important that the executive, legislative and judicial branches of government continue to function under emergency conditions. In severe disaster situations, continuity of government may be jeopardized. Provisions have been made for emergency authorities and succession of these branches of government. For example, if the Chief Executive Official (Chairperson of the Board of Commissioners) is unavailable or unable to exercise the powers and duties of the office, the next in the line of succession for this position is the Vice Chairperson of the Board of Commissioners. This line of succession provides for continuous leadership, authority and responsibility.

Governor's Declaration of a "State of Emergency".

If the disaster or emergency is considered to be beyond the control of the local jurisdiction, the Chief Executive may request that the Governor declare a "State of Disaster" or "State of Emergency" so that State assistance can be made available to the local jurisdiction. This request is made through the EMHSD District Coordinator. Affected municipalities may also request this assistance on an individual basis

through the county channels addressed above. NOTE: The Chief Executive must declare a "Local State of Emergency" prior to requesting a Governor's Declaration of Emergency or Disaster.

The Department of State Police, EMHSD District Coordinator, in conjunction with the local EMC, analyzes the incident to determine necessary actions. The EMHSD makes recommendations and, through channels, this information is reported to the Governor, who may declare a "State of Disaster" or a "State of Emergency". The Governor may take action deemed necessary within the authority granted in Act 390, P.A. 1976, as amended, and other applicable statutes. Appropriate state agencies may be notified and mobilized. Local Emergency Action Guidelines (EAG) may be activated if not activated previously. At this time, local government assigns and makes available for duty employees, property, or equipment for disaster relief purposes if requested by the Governor. The Governor utilizes these resources as is reasonably necessary to cope with the disaster. The District Coordinator coordinates State response and recovery activities at the scene with the EMC. The declaration of emergency or disaster remains in effect for *fourteen days* or unless terminated or extended by the executive order or proclamation and approved by the legislature.

If the Governor determines that Federal assistance is necessary to supplement the efforts and available resources of State and local governments, he may request that the President of the United States declare a major disaster or emergency for the affected area under provisions of the appropriate Federal law.

More detailed information on specific tasks and execution can be found in the Charlevoix, Cheboygan, and Emmet County Emergency Action Guidelines (EAG).

1520.7 CHEBOYGAN COUNTY, MI

See section 1520.6 CHARLEVOIX, CHEBOYGAN, EMMET COUNTIES (CCE)

1520.8 CHIPPEWA COUNTY, MI

Reserved for Chippewa County.

1520.9 CRAWFORD COUNTY, MI

Reserved for Crawford County.

1520.10 DELTA COUNTY, MI

Reserved for Delta County.

1520.11 EMMET COUNTY, MI

See section 1520.6 CHARLEVOIX, CHEBOYGAN, EMMET COUNTIES (CCE)

1520.12 GRAND TRAVERSE COUNTY, MI

Reserved for Grand Traverse County.

1520.13 KALKASKA COUNTY, MI

Reserved for Kalkaska County.

1520.14 LEELANAU COUNTY, MI

Reserved for Leelanau County.

1520.15 LUCE COUNTY, MI

Reserved for Luce County.

1520.16 MACKINAC COUNTY, MI

Reserved for Mackinac County.

1520.17 MANISTEE COUNTY, MI

Reserved for Manistee County.

1520.18 MARQUETTE COUNTY, MI

Organization

The Emergency Management office of Marquette County is a central point of contact for a wide range of emergency management activities. Emergency management staff is dedicated to working with public officials to improve our county's preparedness and increase our ability to respond to emergencies of all types. The ranking fire officer on scene will serve as the tactical Incident Commander (IC) and direct the on-scene tactical operations and coordinate efforts of all agencies involved in on-site emergency operations related to the incident. Hazardous materials incidents shall be managed utilizing the National Incident Management System (NIMS). In Marquette County, the basic unified command structure and organization will consist of:

- The Fire Department with jurisdiction for the incident site (Tactical Incident Commander).
- Local and County Emergency Management officials (Community Emergency Coordinators).
- Marquette County Health Department official(s).
- The licensed Emergency Medical Services and rescue organization having jurisdiction, including EMS Medical Control.
- The Law Enforcement agency having jurisdiction.
- The Michigan Department of Environmental Quality will be requested to report to the incident scene, at which time he/she will be assigned to the Incident Command staff.
- The person or official in charge of involved facility (Facility Emergency Coordinator).
- Additional agencies as their involvement in the incident increases.

The Fire Department (IC), Emergency Management, Health Department, Law Enforcement, EMS, and DEQ representatives should be co-located at the Incident Command Post with direct access to the IC. Additional information on Marquette County can be accessed at: http://www.marquette.org/. Information on Marquette County Emergency Management can be found at: http://www.co.marquette.mi.us/centraldispatch/emergency.htm.

Direction and Control

Overall management of an emergency or disaster situation will be accomplished from an emergency management facility, such as a command post (CP) or emergency operations center (EOC). A command post (CP) shall be established at the scene of any emergency incident to coordinate site response activities and resources. The following resources are available and may be requested to supplement local command post operations when additional facilities and communications capabilities are indicated:

- Marquette County Sheriff's Mobile Command Unit
- Michigan State Police Mobile Command and Communications Vehicle (Lansing, MI)

For localized incidents, personnel from the agency(s) with primary jurisdiction for incident command will be responsible for arranging necessary staffing of the on-scene command post. If an EOC has not been activated, the officials or representatives designated by each of the responding agencies may coordinate their agency's response from the command post. If an EOC has been activated, these representatives will generally report to the EOC and assign individual(s) to the command post to coordinate and oversee on-scene tactical operations and response activities.

The use of a city or township level emergency operating center (EOC) should be considered if the situation is limited to a single jurisdiction and does not warrant county wide response. An EOC should be established for an emergency situation whenever the incident command post is not appropriate.

Upon receipt of information, the Marquette County Central Dispatch Center or other responsible agency, shall immediately contact the Marquette County Emergency Management Coordinator. If the situation is deemed to be of the magnitude that may require activation of the county EOC, the County Emergency Management Coordinator shall advise the Chairperson of the County Board and authorize activation of the county EOC.

EOCs for local units of government and Marquette County should be prepared for operations and staffed to the degree necessary:

- When the Chief Executive Official for the jurisdiction and/or local emergency management officials require an overview of an emergency situation, or when centralized strategic policy making, planning, support, information, and coordination is required to properly mitigate emergency or disaster conditions.
- Whenever natural or human caused conditions threaten to cause wide spread damage or significant harm and loss of life.
- When directed by the Governor of Michigan or the Emergency Management Homeland Security Division, Michigan State Police.
- Whenever national security emergency conditions are implemented by federal authorities.

County and local EOCs should be capable of functioning continuously for the duration of the emergency. Each position within the EOC should have at least one alternate assigned. Shift changes will generally occur every eight to twelve hours.

Response Procedures

When an oil or hazardous materials incident occurs, notification of the incident can be received in several ways. Most incidents will be reported via 911 to the Marquette County Central Dispatch Center. The initial responding units (whether law enforcement, EMS, or fire) will be responsible for assessing the incident for potential hazards and immediately notifying the Marquette County Central Dispatch of an actual or suspected hazardous materials incident.

The first arriving emergency service units must immediately evaluate the situation for its potential danger to the safety and health of the initial responders and the at risk population in the immediate incident area. The area will be restricted immediately by law enforcement, fire, rescue, and EMS agencies until the danger or potential hazard can be more thoroughly assessed. A command post will generally be established at or near this site. All services and agency representatives initially called to the scene should be directed to this control point, or the designated staging area.

More detailed information on specific tasks and execution can be found in the Marquette County Emergency Action Guidelines (EAG).

Reference:Marquette County Emergency Action Guidelines

1520.19 MENOMINEE COUNTY, MI

Reserved for Menominee County.

1520.20 MISSAUKEE COUNTY, MI

Reserved for Missaukee County.

1520.21 MONTMORENCY COUNTY, MI

Reserved for Montmorency County.

1520.22 OSCODA COUNTY, MI

Reserved for Oscoda County.

1520.23 OTSEGO COUNTY, MI

Reserved for Otsego County.

1520.24 PRESQUE ISLE COUNTY, MI

Reserved for Presque Isle County

1520.25 ROSCOMMON COUNTY, MI

Reserved for Roscommon County.

1520.26 SCHOOLCRAFT COUNTY, MI

Reserved for Schoolcraft County.

1520.27 WEXFORD COUNTY, MI

Reserved for Wexford County.

1600 NATIONAL POLICY & DOCTRINE

1610 PUBLIC AND PRIVATE RESOURCE UTILIZATION

OPA 90 reaffirmed the basic principle that the primary source of an oil spill preparedness and response system in the U.S. should be implemented and maintained by the private sector. It is not, nor should it be, USCG's or EPA's intent to compete with the commercial oil and hazardous materials pollution response industry. The utilization of government resources in lieu of commercial resources can place the government in a competitive environment. This is not the intent of OPA 90, as it defeats the incentive for commercial enterprise to maintain equipment and trained personnel in a competitive market. USCG and EPA pre-positioned response equipment, other publicly owned response equipment, and other initiatives under USCG's and EPA's oil spill response programs may be used if the commercial industry does not have readily available resources, and only until such time that the FOSC or the UC decides to release the resources.

The FOSC has the authority and responsibility to contain, control and carry out response activities for the removal of a discharge where a substantial threat to public health or welfare, or where natural resources are endangered. At the direction and discretion of the FOSC and the UC, when the RP executes a suitable response, any government equipment deployed should be withdrawn as commercial equipment becomes available and is placed into service.

The FOSC may consider using USCG, EPA, DOD or Oil Spill Cooperative resources in such instances when the spill has been federalized and/or private sector resources cannot respond to the incident in a timely manner, or when there are certain specific resources not available from the private sector.

1620 BEST RESPONSE CONCEPT

The term "Best Response" means that a response organization will effectively, efficiently and safely respond to oil spills, minimizing the consequences of pollution incidents and to protecting national environmental and economic interests.

"Best Response" equals a successful response based on achievement of certain key success factors (i.e. the things that a response must accomplish to be considered successful) as follows:

- **Human Health**
  - No public injuries
  - No worker injuries
- **Natural Environment**
  - Source of discharge minimized
  - Source contained
  - Sensitive areas protected
  - Resource damage minimized
- **Economy**
  - Economic impact minimized
- **Public Communication**
  - Positive media coverage
  - Positive public perception
- **Stakeholders Support**
  - Minimize stakeholder impact
  - Stakeholders well informed
  - Positive meetings
  - Prompt Handling of claims
- **Organization**
  - Standard Response Mgmt Syst
  - Sufficient/Efficient resources

When conducting an oil spill response, Incident Commanders and their Command and General Staffs should always consider the "Best Response" concept while managing operational and support/coordination functions. Additional information on "Best Response" Concept is listed in Chapter 19 of the USCG IMH.

Incident Commanders and their Command and General Staffs need to closely monitor how well the incident objectives, strategies and tactics are addressing "Best Response" and key response functions, and to make appropriate adjustments where necessary to ensure the maximum potential for success.

1630 FISH AND WILDLIFE ACTS COMPLIANCE

1630.1 ENDANGERED SPECIES ACT

The Endangered Species Act (ESA) requires that federal agencies ensure that the actions they authorize, fund or carry out are not likely to jeopardize listed species or destroy or adversely modify their designated critical habitat. Response to an oil spill is an emergency; however, this does not relieve the responding federal agencies of their responsibilities under the ESA. During emergencies, this responsibility can be fulfilled by the responding agency relatively quickly through informal consultation, with formal consultation being completed if needed after the emergency response is complete and the case is closed. The NCP requires that Area Committees and FOSCs consult with the US Fish and Wildlife Service (FWS) and NOAA and other interested natural resource management agencies and parties during planning for sensitive areas (40 CFR 300.210(c)(4)(i) and during response (40 CFR 300.305(e)). The Memorandum of Agreement for Spill Planning and Response Activities under the NCP and ESA (http://www.nrt.org/Production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-259ESAMOU/$File/ESAMOA.pdf?OpenElement
or
http://www.nrt.org/production/NRT/RRT3.nsf/Resources/Section7/$File/MOATrainingManualVersion02_1.pdf) provides guidance for implementing these provisions as well as the emergency consultation provisions in the interagency regulations implementing Section 7 of the ESA (50 CFR 402.05). The DOI requires notification for any oil/hazmat discharge that may impact any endangered species, any

properties or facilities that are managed by the DOI, or that may result in the death of migratory birds or fish.

- Fish and Wildlife and Sensitive Environments Annex (prepared by U.S. Department of Interior, Office of Environmental Policy and Compliance and the U.S. Fish and Wildlife Service, Region 3.
- Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act (signed by representatives of the U.S. Coast Guard, U.S. EPA, U.S. Fish and Wildlife Service, NOAA – National Marine Fisheries Service and National Ocean Service, and DOI – Office of Environmental Policy and Compliance, May 2001).

Note: See Section 4730 for Endangered Species Protection during Oil Discharge Emergency Response Operations

1640 PROTECTION OF HISTORIC PROPERTIES (NATIONAL HISTORIC PRESERVATION ACT)

Section 106 of the National Historic Preservation Act (NHPA) provides that federal agencies are to take into account the effects of "federal or federally assisted undertakings" on historic properties that are listed in or eligible for inclusion in the National Register of Historic Places. An "undertaking" includes an environmental response coordinated by an FOSC. The NCP does not provide specific guidance for taking historic properties into account during emergency response to an actual or threatened release of a hazardous substance, pollutant or contaminant or to the discharge of oil or other pollutants. Also, emergency provisions contained in the regulations implementing Section 106 of the NHPA do not directly address requirements for such emergency responses.

As a result, several federal departments and agencies entered into a Programmatic Agreement (http://www.achp.gov/NCP-PA.html) on the Protection of Historic Properties During emergency response under the NCP to ensure that historic properties are taken into account in their planning for and conduct of the emergency response under the NCP. Generally, during pre-incident planning, historic properties and exclusions are identified to the fullest extent possible; notification lists are generated; and emergency response strategies are developed. During a federally-led emergency response in an area that has not been excluded, the FOSC will activate the agreed-upon mechanism for addressing historic properties, including notification of the identified parties, consult with them regarding historic properties that may be affected, assess the potential effects of emergency response, and develop and implement response activities. Note that if it is clear to the FOSC that no historical property is involved, then there is no need to obtain expertise or hire a Historic Properties Specialists to make such a determination. It is recognized that historic properties is only one of the many issues that FOSC's take into account when responding to a spill. The DOI requires notification when any DOI facility that is protected under the NHPA has been or may be impacted by a discharge of oil/hazmat.

The NHPA also requires that each state have a State Historic Preservation Officer (SHPO). The SHPO can provide many important services to local governments and historic preservation commissions.

Under National Park Service (NPS) regulations, a staff of appropriate preservation officials, in most cases including historians, architectural historians, historical architects and archaeologists, must assist each SHPO. Academic institutions, historical and archeological societies, and other preservation-oriented groups also assist many SHPOs through contracts or cooperative agreements.

NHPA established certain SHPO responsibilities. These include the following:

- Ensuring comprehensive statewide historic preservation planning;
- Conducting a statewide survey to identify historic properties;
- Nominating properties to the National Register of Historic Places;
- Assisting local governments in developing historic preservation programs and in becoming certified to participate in the national program;
- Advising and assisting in federal, state and local historic preservation projects;
- Participating in review of federal, state and local undertakings that may affect historic properties;
- Providing public information, education, training and technical assistance in historic preservation.

Under National Park Service (NPS) regulations, SHPOs may also participate in NPS certification of properties and projects for historic preservation tax incentives. In addition, SHPOs carry out duties under state laws and seek to advance the interests of historic preservation generally in their states. For example, many SHPOs:

- Conduct preservation conferences and workshops;
- Distribute state grants and loans for preservation;
- Maintain and interpret state-owned historic properties;
- Conduct programs to acquire and administer historic preservation easements;
- Administer state legislation to protect historic properties from non-federal construction and land-use projects;
- Administer state legislation relating to archeological resources, shipwrecks and other special kinds of historic properties;
- Publish newsletters, scholarly publications, and popular books and brochures;
- Administer state history museums and conservation laboratories;
- Develop and support state and local preservation statutes;
- Help state and local authorities use preservation in primary and secondary curricula, and in public education generally; and
- Provide technical assistance to owners of historic properties.

Note: See Section 4740 for Protection of Historic Properties during Emergency Response Operations under the National Oil and Hazardous Substances Pollution Contingency Plan

SHPOs in Northern Michigan Area of Responsibility:

Name	Address	Contact Information
Brian D. Conway, SHPO	State Historic Preservation Office Michigan State Housing Development Authority 735 E. Michigan Ave. P.O. Box 30044Street Lansing, MI 48909	Office: (517) 373-6360 Email: conwayb1@michigan.gov

1650 CLEANUP ASSESSMENT PROTOCOL (HOW CLEAN IS CLEAN?)

40 CFR 300.320 (General Pattern of Response) states: "Removal shall be considered complete when so determined by the FOSC in consultation with the Governor(s) of the affected state(s). When the FOSC considers removal complete the OSLTF removal funding shall end." Due to the differences between one incident and the next, the FOSC will take all issues and agency concerns into consideration prior to making the "Removal Complete" assessment. Any group(s) or individual(s) with issues or concerns regarding an incident clean up should forward them via the Liaison Officer (LO) of the Incident Command Staff or their respective Governor's office.

1650.1 DISPERSANT PRE-APPROVAL/MONITORING/DECISION PROTOCAL

See Appendices F & H. Dispersant use is NOT authorized on/in the waters of the Great Lakes.

1650.2 IN SITU BURN (ISB) APPROVAL/MONITORING/DECISION PROTOCOL

In Situ Burn (ISB) will be considered on a case by case basis on the Great Lakes via consultation involving the FOSC, RP, and applicable state and federal agencies, including federal trustees. The RRT will weigh issues concerning the impact of mechanical cleanup methods on areas oiled by the spill versus ISB, the impact of an ISB on air quality throughout the Great Lakes States and Ontario, Canada, along with general health and safety impacts.

1650.3 BIOREMEDIATION APPROVAL/MONITORING/DECISION PROTOCOL

See Appendix F & H.

1660 ALTERNATIVE RESPONSE TECHNOLOGY EVALUATION SYSTEM (ARTES)

ARTES is designed to provide the FOSC with a method for evaluating optional response countermeasures in advance or during an oil or chemical spill. During an oil or chemical spill, the On-Scene Coordinator (OSC), may be asked to consider using a non-conventional alternative countermeasure (a method, device, or product that hasn't typically been used for spill response). To assess whether a proposed countermeasure could be a useful response tool, it's necessary to quickly collect and evaluate the available information about it. To aid in evaluating non-conventional alternative countermeasures in particular, the Alternative Response Tool Evaluation System (ARTES) was developed. ARTES was designed by Regional Response Teams II and III workgroups.

ARTES can also be used to evaluate proposed conventional countermeasures. It is designed to evaluate potential response tools on their technical merits, rather than on economic factors. Under ARTES, an Alternative Response Tool Team (ARTT) rapidly evaluates a proposed response tool and provides feedback to the OSC in the form of a recommendation. The OSC then can make an informed decision on the use of the proposed tool. Detailed information, forms, flowcharts, etc., on ARTES can be accessed at:
http://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/resources/alternative-response-tool-evaluation-system-artes.html

1670 SPECIALIZED MONITORING OF APPLIED RESPONSE TECHNOLOGY (SMART)

SMART establishes a monitoring system for rapid collection and reporting of real-time, scientifically based information, in order to assist the UC with decision-making during ISB or dispersant operations. SMART recommends monitoring methods, equipment, personnel training, and command and control procedures that strike a balance between the operational demand for rapid response and the Unified Command's need for feedback from the field in order to make informed decisions. SMART is not limited to oil spills. It can be adapted to hazardous substance responses where particulate air emission should be monitored and to hydrocarbon-based chemical spills into fresh or marine water. For additional SMART information, see http://docs.lib.noaa.gov/noaa_documents/648_SMART.pdf.

1680 SENSITIVE SECURITY INFORMATION (SSI) RELATING TO ACPs

Background

In the wake of the Sep 11, 2001, Area Contingency Plans (ACPs) and Regional Contingency Plans (RCPs) were removed from the National Response Team (NRT) Internet website and other websites with the expectation that sensitive information included in the plans would be removed, after which the plans would be reposted. Sensitive information is defined as information that might prove valuable to terrorist organizations intent on harming the United States. This action was recommended by the NRT.

The NRT tasked the NRT Preparedness Committee with developing a list of sensitive information types and implementation guidelines for removing and reposting this information from the ACPs and RCPs so that the public could regain access to the plans. As a result, the attached list of 12 types of sensitive information attempts to make an accommodation between removing all information that terrorists might find helpful and going "too far" by removing information that is of particular value to the incident planning and response communities. The list of 12 types of sensitive information has been reviewed by the NRT, USCG Intelligence, Port Security and web content officials and deemed "reasonable and justifiable."

Implementation

ACPs and RCPs containing any of the itemized types of sensitive information are considered for official use only and may be distributed only at the plan administrator's (e.g., RRT Co-Chair or other individual designated by an RRT Co-Chair) discretion.

Regional Contingency Plans

By December 31, 2003, RRTs should review their RCPs for sensitive information. Any information deemed sensitive should be removed prior to reposting to the Internet. In most cases, revision of RCPs should be relatively less difficult than area plans because almost all of the RCPs are based on the National Contingency Plan format and do not include sensitive information.

Area Contingency Plans

By December 31, 2003, Area Planning Committees should have completed their review of their ACPs for sensitive information, removed information as appropriate, reposted for Internet access (including on the NRT website, where appropriate), and advised their USCG District Area Plan Administrators and EPA RRT coordinators that these steps were completed.

Itemization of Sensitive Information

The following types of sensitive information should be removed from ACPs and RCPs:

1. Personal contact information for agency personnel to include their home addresses and phone numbers (unless this phone number is used as an agency emergency contact notification).

2. Personal contact information of chemical and petro-chemical facility personnel to include their names, home addresses and phone numbers.

3. Petro-chemical and chemical facility information, to include: facility schematics showing pipe and tank locations; products and hazardous materials handled including volumes, types and locations; transfer schedules; and/or security measures.

4. Locations of radiation sources in the region (lists of facilities with licenses and what type of source).

5. Maps or diagrams depicting hazardous material plume trajectories (in the event of a release), based on actual products transported, stored, or manufactured in the area. (Note: Oil spill trajectories as they relate to possible scenarios are not considered sensitive.)

6. Hazardous materials (HazMat) and Weapons of Mass Destruction (WMD) scenarios based on actual products transported, stored, or manufactured in the area.

7. Bulk chemical and liquefied hazardous gas carrier schedules and routes. (Note: Many LNG/LPG vessels have moving and/or fixed Safety Zones [33CFR165] associated with them; however, their routes are not identified in the regulations and likewise should not be made available through an ACP.)

8. Railroad references when detailing bulk HazMat shipments.

9. Oil, chemical and natural gas pipeline diagrams.

10. Locations of public and private drinking water systems including intakes, pumping stations, wells, and other key delivery components.

11. Hazmat and public health resource listings including hospitals able to assist with decontamination and disposal of biologically contaminated material.

12. Terrorism annexes (for ACPs that have included them).

The Port Area Committee will review the Northern Michigan ACP to ensure the 12 types of sensitive information listed above are removed as appropriate and reposted for Internet access in accordance with the NRT ACP-RCP Internet Security Technical Assistance Document of 12 Aug 03.

1700 **RESERVED**

1800 **RESERVED**

1900 **RESERVED FOR AREA/DISTRICT**