

ALASKA REGION NATIONAL PARK SERVICE

**GENERIC PARK OIL AND HAZARDOUS SUBSTANCES
SPILL PREVENTION AND EMERGENCY RESPONSE PLAN**

March 1991

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GENERIC PARK OIL AND HAZARDOUS SUBSTANCES
SPILL PREVENTION AND EMERGENCY RESPONSE PLAN

I. INTRODUCTION

Purpose of Park Spill Prevention/Response Plan

The (name of park) Oil and Hazardous Substances Spill Prevention and Emergency Response Plan (Park Spill Prevention/Response Plan) was prepared in response to federal legislation and policy which require the development of a comprehensive emergency network from the national to local level to address oil and hazardous substances pollution. The plan will provide guidance to park staff and other government agency personnel concerning oil/hazardous substance discharge prevention and emergency response planning for the park.

Relationship to the National Park Service (NPS) Alaska Region Oil and Hazardous Substances Spill Prevention and Emergency Response Plan

The NPS Alaska Region Spill Prevention and Emergency Response Plan (NPS Regional Spill Prevention/Response Plan) will serve as a supplement to the Park Spill Prevention/Response Plan. The NPS Regional Spill Prevention/Response Plan provides an overview of NPS responsibilities, pre-emergency planning and emergency response procedures. It also gives general direction for NPS personnel when confronting pollution incidents which may affect the park.

The Park Spill Prevention/Response Plan provides detailed guidance and policies specific to the park.

Consideration of Other Discharge Contingency Plans

The following local oil/hazardous substance contingency plans were considered in the preparation of the Park Spill Prevention/Response Plan.

- 1.
- 2.
- 3.
- 4.

NPS Responsibilities

Park personnel are responsible for taking preventive measures to minimize the potential for a discharge of oil or a hazardous substance from facilities under NPS jurisdiction. The NPS must be prepared to respond in a responsible manner to any discharge from a facility or vessel under its jurisdiction.

In addition, NPS contingency planning must anticipate that park may be affected by a discharge from non-NPS facilities and vessels.

The NPS may also be asked to provide park resources or other assistance for utilization in a federal response operation in the general vicinity of the park.

II. PRE-EMERGENCY PLANNING

Park Spill Prevention and Emergency Response Organization

The (position title) will serve as the **Park Spill Prevention/Response Coordinator**. The (position title) will act as **alternate**. Additional permanent and seasonal staff will participate as necessary.

Staff Responsibilities

A. **Park Spill Prevention/Response Coordinator**

1. Primary responsibility: pre-emergency planning and coordination of park response activities.
2. Duties include:
 - a. Maintain up-to-date information on the following subjects:
 1. The location of sensitive natural and cultural coastal resources (Appendix A).
 2. An inventory of potential threats: including NPS and non-NPS oil and hazardous substances (Appendix B).
 3. The location of sites suitable for response support activities (Appendix C).
 4. Private contractors and qualified NPS/non-NPS response personnel (Appendices D and F).

- b. Identify specific oil spill scenarios to which park staff will be prepared to respond and the appropriate response procedures (Appendix E).
- c. Develop a roster of qualified park personnel available to participate in response activities (Appendix F).
- d. Develop a training program for park personnel (Appendix G).
- e. Maintain an inventory of NPS equipment and supplies appropriate for specific oil spill scenarios (Appendix H).
- f. Develop agreements with public/private facility managers located within and adjacent to park for use of equipment, supplies and human resources to respond to an incident threatening park/preserve resources (Appendix I).
- g. Maintain a record of incidents within and adjacent to the park/preserve (Appendix J).
- h. Be familiar with non-NPS facilities located within and adjacent to park which require an SPCC Plan (Appendix K).
- i. Ensure consideration of principles embodied in 40 CFR 112 during NPS facility planning and design.
- j. Provide for the timely preparation, implementation, review and revision of NPS SPCC Plans.
- k. Maintain multiple copies of the up-to-date SPCC plan at the facility site, park office, and the Alaska Regional Office (ARO).
- l. Use "best management" facility operation and maintenance practices which minimize the potential for discharge.
- m. Develop shut-off and containment procedures for NPS facilities to minimize the effect of a discharge (Appendix L).
- n. Monitor maintenance practices to ensure spill prevention procedures are being followed routinely.

- o. Monitor or participate in the development of local contingency plans.
- p. Prepare and submit the Alaska Region Incident Report (Appendix M) and other follow-up reports in a timely manner.

B. Alternate

1. Duties include:

- a. Document all NPS response activities and maintain a record of expenditures (see NPS Regional Plan, Chapter VII, page 60).
- b. Conduct Damage Assessment according to Departmental procedures (see NPS Regional Plan, Chapter IX and Appendix P).

C. Other Staff

NPS personnel will report unsafe procedures and the potential discharge of oil or a hazardous substance to the Park Spill Prevention/Response Coordinator. Personnel will follow discharge prevention and emergency response procedures developed for the park.

Sensitive Resources

See Appendix A for the identification of sensitive cultural and natural resources within the park.

Potential Threats

Oil and hazardous substances are located within, adjacent to, and are routinely transported through the park. An inventory is contained in Appendix B.

A record of discharge incidents is contained in Appendix J.

Facility Spill Prevention Control and Countermeasure (SPCC) Plan

A. Facilities under NPS jurisdiction

The park will comply with the requirements of 40 CFR 112 (see NPS Regional Spill Prevention/Response Plan, pages 24-30 and Appendix E).

Emergency response procedures contained in the SPCC Plan(s) will conform to federal/state requirements and be consistent with the Park Spill Prevention/Response Plan and other appropriate local contingency plans.

The Park Spill Prevention/Response Coordinator will:

1. Provide for appropriate instruction of facility personnel about discharge prevention and emergency response procedures.
2. Maintain copies of the updated SPCC Plan at the facility site and park office.
3. Ensure that the ARO has a copy of the updated SPCC Plan.

B. Non-NPS facilities

The Park Spill Prevention/Response Coordinator will maintain an inventory of non-NPS facilities located within or in close proximity of the park which are required to have an SPCC Plan (40 CFR 112).

The Park Spill Prevention/Response Coordinator will consult the Environmental Protection Agency (EPA) and/or the Alaska Department of Environmental Coordination (ADEC) regarding the adequacy of the SPCC Plan. In addition, the Park Spill Prevention/Response Coordinator will periodically inspect the facility and/or contact the facility operator to ensure that:

1. The required spill containment facilities are being adequately maintained to protect park resources.
2. The Park Spill Prevention/Response Coordinator is included in the emergency response notification list.

A description of the facilities and a record of site inspections, and consultation with the facility operator, EPA and/or ADEC is contained in Appendix K.

Coordination with Local Public/Private Facility Managers

The park will investigate the opportunities and benefits of entering into agreements with public/private facility managers for use of equipment, supplies and human resources during incident response operations. The agreements are contained in Appendix J.

Oil/Hazardous Substance Discharge Scenarios

- A. The following oil/hazardous substance discharge scenarios could affect the park:
1. Discharge from an NPS or non-NPS oil storage tank/fuel line in service within the park (see Appendix B).
 2. Discharge of oil within or adjacent to the park during its transport via aircraft, vessel, truck, pipeline or rollagon.
 3. Discharge from non-NPS oil storage/transfer facility located outside the park.
 4. Oil discharged into coastal or inland waters that spreads to the park.
 - 5.

(What is the status of facility safety/emergency prevention/response planning? Is it adequate to protect NPS interests?)

NPS Emergency Response Resources

- A. Incident scenarios to which park personnel will respond.

Park personnel and material resources available for use in oil/hazardous substance discharge emergencies are limited. Therefore, park staff will primarily prepare for limited oil spills from NPS facilities and non-NPS facilities when park resources are threatened (see Appendix E). In addition, NPS assistance may be requested for a federal pollution response operation.

- B. Equipment available for response activities.

Equipment will be available to effectively respond to the identified scenarios. The park will maintain an adequate supply of spill containment/cleanup equipment and materials in locations familiar to staff. The inventory identified in Appendix H will be checked at least twice a year to assure its state of readiness.

Non-NPS Emergency Resources

Private contractors or other qualified non-NPS personnel will be utilized for containment/cleanup of a hazardous substance or an oil discharge for which the park is unprepared to respond.

Contractors shall initiate containment response as soon as possible. This may include, but is not limited to, the deployment of approved containment booms, skimmers, absorbent equipment and containers. All recovered material will be removed from the park. Federal/state regulatory requirements/procedures will be enforced.

The EPA, U.S. Coast Guard and/or the Alaska Regional Plan (Appendix N) will be consulted regarding contractors who service Southcentral Alaska. The roster of contractors and personnel to be used is contained in Appendix D.

Sites Suitable for Staging Response Operations

The park will maintain an up-to-date inventory of sites suitable for staging response operations (see Appendix C).

Activities Which Require Park Superintendent Approval

A. Park Superintendent approval is required for the following activities:

1. Park participation in response activities associated with a non-NPS oil discharge scenario not previously cleared by this plan.
2. Emergency response support activities which involve:
 - a. Ground disturbance (see NPS Regional Plan, page 58).
 - (1) Construction of new roads, camps, staging areas.
 - (2) Beach access.
 - (3) Use of all-terrain vehicles.
 - (4) Use of earth-moving equipment.
 - b. Helicopter use within the park.

The majority of park lands are designated wilderness. Should an incident occur in a wilderness area, the use

of helicopters and other motorized equipment will be approved on a case by case basis.

(Park policy should be consistent with the "Draft" Regional Policy.)

3. Utilization of volunteers.

(The use of volunteers will be considered on a case by case basis.)

Federal On-Scene Coordinator (OSC) guidelines for the use of volunteers will be developed. The present federal response operation policy contained in the Alaska Region Oil and Hazardous Substances Pollution Contingency Plan (Annex XI) states:

"Unless specifically requested by the OSC, volunteers will not be used for physical removal and/or remedial activities. If, in the judgment of the OSC, dangerous conditions exist, volunteers shall be restricted from on-scene operations. There are, however, several areas in which volunteers can be very useful. Specific areas such as amateur radio communications, beach surveillance, logistical support, and bird and wildlife treatment, should be identified in both local emergency plans and Federal local contingency plans to allow for well-organized and safe use of volunteers."

Volunteers will be considered for the capturing and cleaning of wildlife. Volunteers would be selected based on their knowledge of the area and experience with cleanup procedures.

III. Emergency Response Procedures

Incident Reporting Requirements

The federal and state reporting requirements for the discharge of oil and hazardous substances are contained in Appendix N. Additional local reporting requirements will be incorporated as necessary.

Incident Response Procedures

A. Notification of Park Spill Prevention/Response Coordinator.

Any discharge or threatening situation involving oil or a hazardous substance will be reported as soon as possible to the Park Spill Prevention/Response Coordinator (or alternate).

- * **Park personnel will not participate in the containment and cleanup of a hazardous substance. The discharge will be reported and steps will be taken to provide for public safety.**

Park Spill Prevention/Response Coordinator
(Position - Name of Staff)

Office number _____
Home number _____

Alternate
(Position - Name of Staff)

Office number _____
Home number _____

B. Response Procedures of the Park Spill Prevention/Response Coordinator (or alternate):

- 1. Notify park Superintendent.**
- 2. Provide for the safety of park personnel and the general public.**

The personal safety of park personnel and the general public will be of the highest priority. Visitors will be evacuated immediately if a spill threatens public safety. No resource threat or damage is worth an injury or loss of life. Safety will be considered in all decisions and actions taken during the response. On-scene operations will be conducted by trained, qualified personnel using all available safety equipment. The assistance of a designated safety officer may be requested depending on the nature of the incident.

- 3. Review federal/state notification requirements to see if discharge must be reported.**
- 4. Notify the National Response Center (NRC) (800-424-8802) as directed by federal reporting requirements.**
 - a. Consult Appendix O about the kind of information to report.**
 - b. Confirm that NRC staff or you will contact local U.S. Coast Guard or EPA personnel.**
- 5. Provide for adequate coordination with the ARO:**
 - a. Notify the Regional Spill Response Coordinator (or alternate).**

Regional Spill Response Coordinator - William Lawrence
Office 257-2648, Home 346-3771

Alternate, Larry Wright, office 257-2649, home 688-4060

(The Regional Spill Response Coordinator will notify the Regional Directorate and the DOI Regional Environmental Officer.)

- b. Continue communications, as necessary, with the ARO for the duration of the emergency response.
 - c. Complete the Alaska Region Incident Response Report form (Appendix M) and send it to the Regional Spill Response Coordinator as soon as possible.
6. **Notify the Alaska Department of Environmental Conservation as directed by state reporting requirements.**
- a. Consult Appendix P about the information to report.
7. **Notify local agencies or facility managers as necessary.**
8. **Consider and implement measures to minimize harm to park resources.**
- a. Prioritize sensitive cultural and natural resources that are to be protected (consult Appendix A).

Be prepared to give this information to the Regional Spill Prevention/Response Coordinator as soon as possible.

- b. Consult with the park Superintendent as required.
- c. Consult with the Regional Archeologist.

The Regional Archeologist will be consulted regarding emergency response activities proposed for the park. Coordination with the Regional Archeologist will be documented.

9. **Identify the personnel and equipment to be committed to the emergency response.**
- a. Park resources (consult Appendices F and H).

- b. Private contractors and/or other qualified personnel and equipment (consult Appendix D).
10. **Direct/monitor the park emergency response activities.**
- a. Lead the park containment and countermeasure activities.
 - b. Evaluate the potential effect of response activities on park natural and cultural resources.
 - c. Coordinate, as required, with the ARO, DOI-Alaska Regional Response Team or federal OSC representative.

Containment and Countermeasure Strategy

Once the source of the oil discharge has been located, the discharge should be stopped as soon as possible after public health and safety concerns have been properly addressed. The discharge should be confined to the smallest area possible. The NPS Regional Spill Prevention/Response Plan, page 49 and Appendix H, should be consulted about containment and countermeasure strategy.

- * Park personnel will not participate in the containment and cleanup of a hazardous substance. The discharge will be reported and steps will be taken to provide for public safety. Private contractors and/or qualified non-NPS personnel will be contacted to respond to a hazardous substance emergency.**

The Park Spill Prevention/Response Coordinator, in consultation with the park Superintendent and Regional Archeologist, will determine the appropriate containment/countermeasure strategy to be adopted.

Cleanup Strategy

The primary response objective is to protect the public health, welfare, and environment. This objective is best attained if it is possible to completely remove the pollutant from the environment. The NPS Regional Spill Prevention/Response Plan, page 53 and Appendix I, should be consulted about cleanup strategy.

- * Dispersants and chemical cleaning agents are not to be used within the park. Questions should be directed to the Regional Spill Response Coordinator.**

Due to the unique nature of each discharge, the choice of techniques (mechanical/physical or chemical methods) is left to the discretion of the pre-designated federal OSC as limited by 33 CFR 153 and subpart H of the National Contingency Plan. The use of mechanical methods and sorbents is preferred over chemical.

The Park Spill Prevention/Response Coordinator, in consultation with the park Superintendent and Regional Archeologist, will determine the appropriate cleanup strategy to be adopted.

Wildlife Conservation Strategy

Purposes for the establishment of the park include the protection of habitat for and populations of fish and wildlife. Therefore the conservation of wildlife will be an important consideration in any response. To accomplish this the park staff will:

- A. Develop and use acceptable procedures for capturing/detering wildlife.
- B. Develop and use approved procedures for treating or rehabilitating oiled wildlife.
- C. Consult the ARRT Wildlife Protection Guidelines.
- D. Coordinate with DOI oiled wildlife working group representatives. (See the list of oiled wildlife response coordinators in the NPS Regional Spill Prevention/Response Plan - Appendix O).

The use of volunteers for cleaning oiled wildlife will be considered on a case by case basis.

IV. POST-EMERGENCY ACTIVITIES

Disposal of Contaminated Material

Procedures that conform to federal/state/local disposal requirements will be used. Private contractors will be utilized as necessary. See NPS Regional Spill Prevention/Response Plan Appendix I (disposal strategy/techniques).

Damage Assessment

The DOI natural resource damage assessment regulations (43 CFR 11) establish procedures to be used by NPS. Damage assessments will be used in court actions and administrative proceedings when compensation is sought from injuries to natural resources resulting from a discharge. This is compensation for

injuries to natural resources that have not been nor are expected to be addressed by the response actions. Assessments are not intended to replace response actions which have as their primary purpose the protection of human health. A claim for the recovery of damages must be made within three years of the discovery of the loss and its association with the discharge.

The thorough assessment of the immediate and long-term damage to park resources from a non-NPS caused discharge is very important. Park staff need to determine the type and extent of post spill monitoring that will be required. A thorough assessment of the environmental damages is necessary. The NPS Regional Spill Prevention/Response Plan, page 59 and Appendix P, DOI Natural Resource Damage Assessment regulations, and the Regional Spill Response Coordinator should be consulted regarding any damage assessment work planned by park staff.

Documentation and Cost Recovery

Documentation of non-NPS caused discharges should be as complete as possible. NPS documentation may form the basis for a civil or criminal action or be the basis for NPS cost recovery. Uniform procedures will be followed in the collection of samples, information and the taking of photographs.

The NPS Regional Spill Prevention/Response Plan (page 60 and Appendices J, K) and the Regional Spill Response Coordinator will be consulted.

Follow-up Reporting/Incident Review

In addition to completing the Alaska Region Incident Report (Appendix M), all reportable spills and any NPS response will be documented on a Case Incident Report (Form 10-343). Additional federal/state documentation will be completed as required.

If requested, the Park Spill Prevention/Response Coordinator will prepare a follow-up briefing report for the park Superintendent and/or the Regional Directorate. A follow-up report will likely be required if there is a major commitment of, or damage to, park resources. The report should address incident cause, preventative measures to be adopted, the effectiveness of NPS response actions and how they might be improved.

In addition, if the park Superintendent or Regional Director decide that further review is necessary, an incident review board, comprised of park and ARO staff, will be convened.

APPENDIX A

Sensitive Resources

The following resources are particularly sensitive to the discharge of oil or hazardous substance and the potentially destructive actions associated with emergency response activities.

(Narrative descriptions and maps should be used to identify resource location.)

A. Cultural resources inventory.

*** Consult Regional Archeologist.**

- 1.
- 2.
- 3.

B. Natural resources inventory.

1. Threatened/endangered species:

- a.
- b.

2. Anadromous fish streams:

- a.
- b.
- c.
- d.

3. Most sensitive coastal waters.

- a.
- b.

4. Areas particularly important to park visitors:

- a.
- b.
- c.

APPENDIX B

Inventory of Potential Threats

A. Inventory of NPS oil and hazardous substances:

1. NPS oil:

a. Underground storage tanks:
(List location, capacity, type of fuel)

b. Above ground storage tanks:
(List location, capacity, type of fuel)

2. NPS hazardous substances:
(List name of material, amount and location)

B. Non-NPS oil and hazardous substances located within,
adjacent to, or transported through the park:

(List name of material, amount and location)

APPENDIX C

Sites Suitable for Staging Response Operations

(This inventory should include narrative descriptions or maps.)

A. Sites within the park:

1.

2.

B. Sites adjacent to the park:

1.

2.

C. Other:

1.

2.

APPENDIX D

Private Contractors and Qualified Non-NPS Response Personnel

	<u>Individual/Company</u>	<u>Specialty</u>	<u>Address</u>	<u>Telephone</u>
1.				
2.				
3.				
4.				
5.				
6.				

APPENDIX E

Oil Spill Response Scenarios/Park Procedures

- I. Discharge of oil from a facility under NPS jurisdiction.
 - A. Discharge associated with the facility operation.
 1. Damaged/defective oil storage tank, valve or fuel line.

(Identify appropriate response procedures.)
 2. Damaged/defective fuel tank/line in vehicle, airplane or boat.
 3. Overfilling of oil storage tank due to equipment malfunction or human error.
 4. Accidental damage to portable fuel containers and/or the appliances which use the fuel.
 - B. Discharge resulting from earthquake or weather-related accidents.
 1. Above ground storage tank shaken off its support system.
 2. Damaged fuel line.
- II. Limited discharge of oil from a non-NPS facility within or adjacent to the park when:
 - A. It is apparent the discharger is unable to effectively contain the spill and:
 1. The discharge is a serious threat to public health and safety.
 2. The discharge affects or threatens sensitive resources of the park.
 3. It is apparent that park resources can be used safely and effectively.

APPENDIX F

Park Qualified Response Personnel Roster

Name	Title	Specialty	Telephone Office - Home
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

APPENDIX G

Training Program

- A. Purpose/objectives of the training program:

- B. Opportunities for training:

- C. Identify park personnel to be trained:

- D. Establish a reasonable training schedule:

APPENDIX H

Inventory of Response Equipment/Materials

A. Inventory of park equipment/materials:

	<u>Item</u>	<u>Quantity</u>	<u>Location</u>
1.	Sorbent pads		
2.	Impermeable sheeting		
3.	Shovels and rakes		
4.	Protective outerwear		
5.	Vehicles		
6.	Absorbent boom		
7.	Deflection boom		
8.	Boats		
10.	Airplanes		

B. Inventory of non-NPS equipment available for use by the park:

	<u>Item</u>	<u>Location</u>	<u>Contact Person</u>
1.			
2.			
3.			
4.			

C. Inventory of non-NPS equipment/materials maintained in area:

	<u>Item</u>	<u>Location</u>	<u>Agency/Company Contact</u>
1.			
2.			
3.			
4.			
5.			

APPENDIX I

Agreements with Public/Private Facility Managers

APPENDIX J

Record Of Incidents

1. a. Date of incident:
b. Substances involved:
c. Incident cause:
d. Known damage to park resources:
e. Actions taken to prevent recurrence:

2. a. Date of incident:
b. Substances involved:
c. Incident cause:
d. Known damage to park resources:
e. Actions taken to prevent recurrence:

APPENDIX K

Non-NPS SPCC Plan/Facility Evaluation Record

The following facilities are a potential threat to the park. Facility owners/operators are required to develop a SPCC Plan according to 40 CFR 112. Park personnel will periodically contact the facility managers, inspect the facilities, or consult EPA and/or ADEC to ensure that NPS interests are adequately protected.

A. (Name of facility)

1. Facility description:

(Include facility purpose, location, storage capacity.)

2. Type(s) of oil:

3. Containment strategy:

(Describe containment measures and natural threats, if any.)

4. Date of consultation with Facility Manager/inspection.

a. SPCC Plan.

(Is there an up-to-date SPCC Plan?)

b. Maintenance of containment facilities.

(Is the maintenance adequate?)

c. Emergency Notification List

(Is the Park Spill Prevention/Response Coordinator and telephone number included on the list?)

5. Consultation with EPA or ADEC.

a. Date plan inspected by EPA/ADEC.

b. Date facility inspected by EPA/ADEC.

c. EPA/ADEC evaluation of plan and containment facilities.

APPENDIX L

NPS Facility Shut-off and Containment Procedures

A. Above ground storage tanks (**identify by size and location**).

1. Shut-off procedures:

a.

b.

c.

d.

2. Containment procedures:

a.

b.

c.

d.

B. Underground storage tanks (**identify by size and location**).

1. Shut-off procedures:

a.

b.

c.

d.

2. Containment procedures:

a.

b.

c.

d.

APPENDIX M

Alaska Region Incident Report

Time/date of discovery _____
Estimated time/date incident occurred _____
Location of discharge/release _____

