

Preparation of Response Plans for Oil Spills from Offshore Facilities

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Contents

	Page
1 Scope and Purpose	1
2 Terms and Definitions	1
3 General Recommendations for Oil Spill Response Plans	6
3.1 Oil Spill Response Plan Content and Layout Concepts	6
3.2 Optional Quick Guide	7
3.3 Regulatory Compliance Cross Reference	8
3.4 Tier Planning	8
3.5 Referencing Other Documents and Information	9
3.6 Other Concepts in Offshore Oil Spill Response Planning	9
4 Oil Spill Response Plan and Quick Guide Templates	11
4.1 Purpose	11
4.2 Template Use	11
4.3 Tables and Figures	12
4.4 Appendices	12
Annex A (informative) Offshore Oil Spill Response Plan Template	13
Annex B (informative) Quick Guide Template	123
Bibliography	131

Figures

Quick Guide Template Contents	124
1 Response Deployment Strategies and Considerations	130

Annex A Figures

1-1 General Pattern of Oil Spill Response	14
2-1 On-Scene Response Actions Sample Flowchart	18
3-1 Sample Notification Flowchart	28
5-1 Team Relationships	43
5-2 Sample Tier 1 Incident Management Team	44
5-3 Sample Tier 2 Incident Management Team	44
5-4 Sample Tier 3 Incident Management Team	45
5-5 Sample Unified Command Structure	48
5-6 Sample Area Command Structure	48
6-1 Sample Spill Response Strategy Decision Guide	50
6-2 Sample Nonmechanical Spill Strategies Authorization Flowchart	55
6-3 Example "Concept of Operations" Diagram	59
6-4a Example Response Strategies Illustration	60
6-4b Example Response Strategies Illustration	61
6-5 Example Mechanical Recovery Tactical Guide	64
6-6 Example Dispersant Tactical Guide	66
6-7 Example In-Situ Burning Tactical Guide	68
C-1 Tier 1 Safety Management Organization	98
C-2 Tier 2 Safety Management Organization	99
C-3 Tier 3 Safety Management Organization	99

Annex A Tables

2-1 Example On-Scene Initial Response Actions	19
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Contents

	Page
2-2 Qualified Individual or Incident Commander Checklist	20
2-3 Sample Oil Volume Tracking Table	25
2-4 Example List of Response Objectives and their Related Strategies.	26
2-5 Sample Response Asset List Table	27
3-1 Sample Notification Contact List	30
4-1 Sample Oil Spill Containment and Removal Resource List	34
5-1 Sample Team Member Roles and Responsibilities	46
6-1 Example “Windows of Opportunity” Table	53
B-1 Sample Oil Discharge Scenario Report	88
B-2 Sample Impact Values	90
B-3 Oil Discharge Scenarios—Consequence Priority Rankings	93
B-4 Worst-Case Discharge Scenarios	94

Introduction

This API Recommended Practice (RP) for the preparation of offshore oil spill response plans was developed for organizations engaged in the oil and gas exploration, production, and transportation (pipeline) industry to capture lessons learned during the response to the 2010 BP/Deepwater Horizon oil spill in the Gulf of Mexico. It was prepared by the API Oil Spill Preparedness and Response Subcommittee - Spill Planning Workgroup which consisted of oil spill planning and response subject matter experts from various API member companies as well as non-member oil and gas companies, consulting firms, Oil Spill Removal Organizations (OSROs) and the regulatory community. It was originally developed as a guidance document but subsequently converted to a Recommended Practice to facilitate wider distribution and utilization.

In developing the original guidance document, the Workgroup identified the types of information and guidance that would be most useful in implementing a response to an offshore oil spill particularly in the initial or reactive phase. Current best practices in oil spill planning and preparedness developed and/or utilized by the Workgroup members were incorporated where practical and appropriate. Lessons learned from the Deepwater Horizon incident, available oil spill planning and preparedness guidelines (both U.S. and International), and current U.S. oil spill planning regulations for offshore and coastal areas were also used to inform the development of the document content and format.

The guidance document was well received by API members resulting in the decision to convert it to an RP. RPs require additional rigor with respect to content and format as well as the involvement, to the extent practical, of external parties including the regulatory community. The aforementioned, more inclusive, Spill Planning Workgroup was then formed and over the course of close to two years, made significant revisions to the original guidance document to incorporate additional best practices and lessons learned as well as to improve the content and format and to comply with API's RP standards.

It is important to note that the use of this RP in the development of an oil spill response plan will not guarantee 100 percent recovery of subsequent oil spills nor will it eliminate all potential environmental impacts. Plans developed using this guidance should, however, increase the chance of an expeditious, well-coordinated and effective response to an oil spill.

The main body of this RP provides general information on references, terminology and considerations that were taken into account when developing this document. The recommendations developed by the Workgroup in Section 3 include a number of features and concepts that were incorporated into the design of this RP. Annex A of the RP contains a template and detailed recommendations for preparing offshore oil spill response plans whereas Annex B contains guidance for the optional "Quick Guide" that often accompanies an oil spill response plan. Annex C contains a bibliography of documents used to inform the development of this RP or that can be used to inform the content for selected sections of an oil spill response plan.

Preparation of Response Plans for Oil Spills from Offshore Facilities

1 Scope and Purpose

This API Recommended Practice (RP) provides information and guidance for the development of oil spill response plans primarily for the offshore U.S. oil and gas exploration, production, and transportation (pipeline) industry. However, the general plan concepts described in Section 3 can be applied to oil spill response plans developed for all types of coastal/marine assets or operations, both in U.S. and international locations. Additionally, this RP, or selected components of it, may be used to inform the development of response plans for any company, organization, or public agency that oversees or conducts the response to oil spills.

The primary purpose of this RP is to compile a series of best practices and other information from workgroup members into a document that can guide the user in the preparation of effective and functional oil spill response plans for offshore facilities. The RP can also be used to modify portions of existing oil spill response plans to enhance effectiveness and functionality.

Although plans prepared or modified using this RP can be used to replace existing response plans required by regulation, the RP is not intended to be a regulatory compliance guideline or to supersede current regulations. The content recommended by this RP was, however, benchmarked against Bureau of Safety and Environmental Enforcement (BSEE) regulations (30 CFR Part 254 and associated guidance in NTL 2012-N06) and found to be in general compliance but will depend on the specific information plan holders include in each section. Conversely, the recommended content is not limited to addressing current BSEE or other regulatory requirements and exceeds those requirements in many areas. Consequently, the incorporation of additional information may be necessary to comply with agency-specific requirements and information not required by regulation can be removed if it does not apply, or add value, to the plan holder.

2 Terms and Definitions

For the purposes of this document, the following definitions apply:

2.1

agency

A division of federal, state, local, or tribal government with a specific oil spill preparedness or response function.

2.2

area command

An organization established to

- a) oversee the management of multiple incidents that are each being handled by an Incident Command System Incident Management Team organization, or
- b) oversee the management of large or multiple incidents to which several incident management teams have been assigned.

NOTE 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 objectives are met and strategies followed (see also: Unified Area Command).

2.3**area contingency plans****ACP**

The plan prepared by an area committee that is developed to be implemented in conjunction with the National Contingency Plan (NCP) and Regional Contingency Plan (RCP), in part to address removal of a worst-case discharge and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility.

2.4**asset**

Any facility, installation, or device installed at a fixed offshore location for the purposes of engaging in oil or natural gas exploration, production, or transportation by pipeline.

NOTE This includes mobile offshore drilling units (MODU's), platforms, subsea oil pipelines, oil/gas wells, flowlines, etc. Also refer to "offshore facility" in applicable regulations.

2.5**boom**

Floating barriers used to contain or control the spread or movement of oil on the surface of the water.

2.6**company**

Any entity engaging in business, such as a proprietorship, partnership, or corporation (either for-profit or not-for-profit).

NOTE A plan holder may be a company, but not all plan holders are necessarily companies.

2.7**decanting**

A process to separate mixtures, such as oil and water, by allowing the mixture of liquids to settle and separate by gravity before pumping or draining the water from the bottom of the container.

2.8**discharge**

Any emission (other than natural seepage) of oil, intentional or unintentional; includes, but is not limited to spilling, leaking, pumping, pouring, emitting, or dumping.

2.9**dispersant**

Chemical agents consisting of surfactants and solvents that facilitate breaking oil into tiny droplets that are dispersed into the adjacent water column by wave or turbulent energy.

2.10**Federal On-Scene Coordinator****FOSC**

The federal official designated to direct and coordinate responses to oil or hazardous-substance releases under the NCP.

2.11**In-situ burning**

The ignition and controlled burning of floating oil, at or near the location of the spill, with the aid of a specially-designed fire-containment boom or other suitable barriers.

2.12**incident action plan****IAP**

A plan containing general incident-response objectives that reflects the overall incident strategy and specific action plans for the next operations period.

2.13**Incident Commander**

The individual with overall authority and responsibility for all incident activities, including the development of strategies and tactics, the ordering and release of resources, and the conducting and management of all incident operations at the incident site.

2.14**incident command post****ICP**

The location at which the primary incident command-and-control functions are performed, and where the Incident Commander is typically stationed.

2.15**incident command system****ICS**

A standardized on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demand of single or multiple incidents, without being hindered by jurisdictional boundaries.

NOTE Refers to the National Incident Management System – Incident Command System.

2.16**Incident Management Team**

The Incident Commander and appropriate Command and General Staff personnel assembled (physically or virtually) to manage the response to an oil spill or other incident, typically following the principals of the Incident Command System (ICS).

2.17**incident**

An occurrence (or event)—either man-made, technological, or natural—that requires action or support by responders to prevent or minimize loss of life or damage to property and/or natural resources.

2.18**Joint Information Center****JIC**

A facility established within or near the ICP where the public information officer (PIO) and staff can coordinate and provide information on the incident to the public, media, and other agencies.

2.19**Local On-Scene Coordinator****LOSC**

A local public representative with jurisdiction over an oil spill incident.

2.20**National Contingency Plan****NCP**

A plan describing the organizational structure and processes that comprise a national approach for managing responses to oil and hazardous substance designed to integrate the efforts and resources of federal, state, local, tribal, private-sector, and nongovernmental organizations.

2.21**National Response Framework****NRF**

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.

2.22**net environmental benefit analysis****NEBA**

A methodology used by the response community for selecting the response option(s) that will minimize the impact of oil spills on people and the environment. It is also known as spill impact mitigation assessment, or SIMA.

2.23**oil**

Oil of any kind or in any form, including, but not limited to, petroleum, crude oil, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil.

2.24**Oil Pollution Act of 1990****OPA 90**

A U.S. federal statute imposing various oil spill preparedness and response requirements, as well as liability for removal costs and damages resulting from an oil discharge into navigable waters, adjoining shorelines, or the exclusive economic zone.

2.25**oil spill removal organization****OSRO**

A company or person(s) who owns or otherwise controls oil spill-removal resources that are designed for, or are capable of, removing oil from the water or shorelines.

2.26**oil spill**

For the purpose of this document, an unauthorized discharge of oil from the confines of an asset, that enters the environment (land or sea).

NOTE Also see “discharge.”

2.27**on-site**

The areal extent of the oil spill, including areas in close proximity, where response actions are conducted or contemplated.

2.28**owner/operator**

Any person, company, organization, or entity that owns or operates an asset, piece of equipment, or vessel applicable to this document.

NOTE 1 When an oil discharge/spill occurs, the owner/operator of an asset will become the responsible party.

NOTE 2 Owners/operators are also plan holders when they develop an oil spill response plan.

2.29**oil spill response vessel**

A marine vessel (or boat) that is designated in its certificate of inspection as such a vessel, or that has been adapted to respond to a discharge of oil or a hazardous material.

2.30**plan holder**

The owner/operator of an asset that requires and develops an oil spill response plan.

2.31**removal**

The containment and removal of oil or hazardous substances from the water and shorelines, or the taking of such other actions as may be necessary to minimize or mitigate damage to the public health or welfare.

2.32**responsible party**

The owner/operator (plan holder) of the facility experiencing the spill, or the lessee or permittee of the area in which the facility is located, that is responsible for responding to an oil spill.

2.33**sensitive areas/resources at risk**

Any location of special socioeconomic or environmental importance.

EXAMPLES Marshes/wetlands, bird rookeries, fish/shellfish spawning/rearing grounds, seasonal migratory waterfowl use areas, water intakes, high-amenity beaches, cultural-use areas, etc.

2.34**shoreline treatment recommendation****STR**

A form used to document shoreline treatment (cleanup) recommendations by the Shoreline Cleanup Assessment Technique (SCAT) team for a specific shoreline segment. The recommendations are then reviewed by Unified Command and, if approved, incorporated into the applicable Incident Action Plan (IAP).

2.35**simultaneous operations****SIMOPS**

The simultaneous execution of two or more tactical operations in response to an oil discharge that occur in the same area or immediately adjacent areas, where special cautions are required to minimize conflicts and safety hazards.

2.36**Spill Impact Mitigation Assessment****SIMA**

A structured process to support the selection of response options resulting in the least overall impacts to environmental, socioeconomic, and cultural resources at risk.

2.37**sorbent**

Inert and insoluble materials that are used to remove oil through adsorption and/or absorption.

2.38**source control**

Action necessary to prevent the continued release of oil into the environment from a point source (e.g., subsea well, pipeline, tank, process equipment, etc.)

2.39**spill of national significance****SONS**

A spill that, due to its severity, size, location, actual or potential impact on public health and welfare or the environment, or the necessary response effort, is so complex that it requires extraordinary

coordination of federal, state, local, and responsible-party resources to contain and clean up the discharge.

2.40

Spill Response Operating Team

SROT

The persons who deploy and operate oil spill–response equipment, and/or contribute skills and services to support tactical oil spill–response operations. These may be asset personnel or third-party contract personnel.

2.41

stakeholder

A person, group, company, or entity that has an interest in an actual or potential oil spill.

2.42

State On-Scene Coordinator

SOSC

A state representative with jurisdiction over an oil spill incident.

2.43

Unified Command

A group consisting of the Incident Commander and federal, state, local, and/or tribal On-Scene Coordinators who work collaboratively to manage the response to an incident.

2.44

vessel

A watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water.

2.45

vessel of opportunity

VOO

Any commercial or private vessel that can benefit the response operation by providing transportation, engaging in containment/removal operations, assisting in wildlife capture/rehabilitation, providing resupply and logistical services, or providing a platform for any other necessary operations.

2.46

worst-case discharge

WCD

The largest foreseeable oil discharge for an asset in adverse weather conditions.

3 General Recommendations for Oil Spill Response Plans

3.1 Oil Spill Response Plan Content and Layout Concepts

This document includes a recommended plan content and layout structure that should provide a useful and effective oil spill response plan template (see Annex A). However, each plan holder should determine the most effective layout, format, and content of their oil spill response plan based on the complexity of their oil spill risks, their regulatory environment, and the nature of their operational assets. Additionally, since these plans are often available to the public, the plan holder should carefully consider the pros and cons of including proprietary or sensitive information.

To maximize effectiveness and functionality, the plan should be organized such that critical response information can be quickly accessed and easily understood. To that end, the primary concepts that underpin the content and layout/organization of the oil spill response plan and Quick Guide templates in

Annexes A and B, respectively, are described below. It is important to note that even if these templates are not utilized, it is recommended that the following concepts are integrated into the development of oil spill response plans regardless of type of operation or location.

- a) Focus on the initial response period, when more specific and detailed guidance is required due to the fast pace of response, personnel resource limitations, and time constraints for response strategies. In subsequent response periods, additional response actions can be developed and directed by the Incident Commander or Unified Command.
- b) Guidance and information on initial response actions should be located near the front of the plan, and key information should be located at or near the front of each section to facilitate quick access.
- c) Plan sections generally follow the pattern of an actual response: Initial Actions, Notifications, Response Resources, Team Organization, Response Strategies, Demobilization, Response Termination, etc.
- d) Place related information in the same section whenever possible to avoid searching through multiple sections to locate all information on a specific topic.
- e) Information can be presented in tabular, checklist, bulleted, or graphical formats to minimize the need to read through several pages of text.
- f) Supplemental, background, and technical information can be referenced in appendices and external documents where appropriate.
- g) Templates and forms for response documentation and response-related action plans are available in the plan.

Plan holders may, at their discretion, re-order, add to, or remove sections of the suggested oil spill response plan template described in Annex A.

3.2 Optional Quick Guide

Since oil spill response plans are comprehensive documents that consider many types of spills and response strategies, as well as detailed asset and resource information, they tend to be rather large documents and, as a result, difficult to utilize by spill response managers in a time-constrained situation. Consequently, many plan holders choose to develop “quick guides” that contain only the information needed by key personnel in the first few hours of a response. Annex B of this document provides a template for such a quick guide, but notes that their content or existence is optional to the plan holder.

If used, it is recommended that the quick guide be placed at the front of the plan and/or as a separately bound document that is easy to carry and readily available to on-site personnel and/or Incident Management Team members. Each plan holder should customize their quick guide to meet the needs of their spill response personnel.

Since the quick guide typically duplicates key response information, including critical contact names and numbers from the oil spill response plan, they must be diligently maintained to ensure consistency between the two documents. There is also the issue of distribution and document control, adding complexity to the maintenance of the quick guide.

3.3 Regulatory Compliance Cross Reference

Oil spill response plans must be compliant with applicable regulations. Most regulations allow for flexibility in the layout of the plan, provided it includes a cross-reference to the appropriate regulatory citations.

Even if not required by regulation, a regulatory cross reference should be prepared to ensure the plan adequately complies with all applicable requirements. The plan should be consistent with “one-plan” or “Integrated Contingency Plan” concepts for plan holders subject to multiple regulatory agency jurisdictions. Regulatory requirements should not, however, detract from developing a plan that is understandable and usable by the personnel responsible for implementation.

3.4 Tier Planning

The content of the oil spill response plan should address all tiers of spill response, from a response lasting a few hours and requiring a small number of resources, up to the plan holder’s worst-case oil spill incident.

Many U.S. and International guidelines and regulations for oil spill response planning recommend a three-tier approach to preparedness, but vary in how the tiers are defined. The tiered approach provides plan holders flexibility in developing response strategies and Incident Management Team structure, instead of a “one-size-fits-all” approach.

In some cases, tiered systems can be volume-based, such as the U.S. National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300). In most oil spill plans, however, the tier definitions are largely dependent on the requirements of the regulatory oversight agency and are based on scenarios, including a worst-case discharge.

This document recommends a three-tier response planning structure similar to the following.

- a) Tier 1—Minor spills, including incipient spills that are quickly controlled, contained, and cleaned up using local (on-site or immediately available) plan holder/contractor owned equipment and personnel resources. For offshore assets, local resources could include those at the asset, on nearby support vessels, or at a designated shore support base or staging area. A Tier 1 spill would typically be resolved within a few hours or days.
- b) Tier 2—Moderate spills, controlled or uncontrolled, requiring activation of significant regional (e.g. Gulf of Mexico) oil spill response resources and all or most of the Incident Management Team. A Tier 2 spill response may continue for several days or weeks.
- c) Tier 3—Major spills, controlled or uncontrolled, requiring activation of large quantities and multiple types of response resources, including those from out of the region, and possibly international sources. The entire Incident Management Team would be required, and would likely be supplemented by outside entities. A Tier 3 spill response may continue for many weeks or months.

These tiers are primarily a planning concept, not a guide or limitation to an actual response. In a real incident, all necessary resources, regardless of the tier, should be mobilized to adequately address the spill response strategies established by the Incident Commander or Unified Command. It is important to note that resources in the donor regions or areas may be dedicated to complying with local planning standards and unavailable for deployment to other areas without a waiver from the jurisdictional regulatory agencies.

3.5 Referencing Other Documents and Information

An oil spill response plan should have enough information to serve as a stand-alone plan for the first period of response (i.e. the first 12–24 hours). This will minimize time spent searching for external documents in an attempt to find critical time-sensitive information. Referencing other documents is more appropriate in subsequent response periods, when there would more personnel and time available to do so.

Referencing information in the oil spill response plan may be appropriate when:

- a) oil spill response plans often cover numerous assets, and referencing/linking to other documents (e.g. environmental impact assessments, exploration plans, etc.) for information required in the first response period may be necessary based on the volume of information, and
- b) planning for large-scale sustained response, when external documents, such as area contingency plans or geographic response plans, can be referenced as needed to reduce unnecessary duplication and minimize the size and complexity of the oil spill response plan.

When referencing electronic documents, an important consideration is that power/Internet outages might disrupt access. Plan holders should have backup strategies in place to access any referenced materials should this occur (such as readily available printed copies).

Another issue when referencing documents—especially documents that the plan holder does not control—is that there may be no way to ensure such documents are updated and accurate. If this information is critical to the first response period, it may be more advantageous for it to be included in the oil spill response plan, where it can be controlled.

If referencing/linking to other documents, the following information should be provided:

- a) document owner
- b) title of document
- c) specific section, page, and/or identifier containing the referenced information
- d) URL that links to the location in the document with the specific information being referenced (if this is an electronic reference)

In general, excessive referencing to small amounts of information should be avoided to make the oil spill response plan more functional as a stand-alone document.

3.6 Other Concepts in Offshore Oil Spill Response Planning

3.6.1 Health and Safety of the Public and Response Personnel

Oil spills present potential inherent hazards to asset personnel, oil spill responders, and the general public. This document seeks to minimize health and safety risks related to common oil spill hazards by recommending guidance for initial incident assessment, and development of a plan appendix containing detailed guidance on oil spill response health and safety. The health and safety appendix in Annex A includes hazard assessment procedures, spill response safety guidelines, and recommended content of an incident-specific Site Safety and Health Plan.

3.6.2 Expanded Notification Procedures

Beyond the regulatory and practical response requirements for internal and external notifications, there are key stakeholders that should be aware of offshore oil spills. Contact information should be provided for notification of all appropriate internal personnel, response resources, law enforcement, federal, state and local officials, wildlife managers, resource stakeholders, and notification of offset (nearby) facilities.

3.6.3 Actionable Plan Content

Oil spill response plans should be based more on specific actions, and less on general methodology. Oil spill plans often have extensive general content on the methods and strategies of oil spill response, but lack detail on how to actually initiate and manage those operations. Flowcharts, checklists, and site-specific actionable content should improve upon those general discussion sections. General methodology and strategy can be referenced, where possible, in such documents as technical manuals, area contingency plans, and other oil spill guidance documents.

3.6.4 Interoperability of Emergency Response, Oil Spill Response, and Source Control

Oil spill response must often be conducted in coordination with search and rescue, fire suppression, salvage, and source control operations. This document contains recommendations on how to describe the relationship of the oil spill response plan to other internal emergency/incident/crisis response plans, and/or source control plan(s).

3.6.5 Risk Assessment and Scenario Planning

U.S. regulatory requirements for oil spill response plans often mandate an emphasis on a plan holder's response to a worst-case discharge. However, smaller operational discharges of fuel and other oils may also occur, and response procedures for those spills should also be addressed in the plan. An asset-based risk assessment should be conducted to identify all types, sources, and volumes of spills, including worst-case discharge(s). If the plan covers multiple facilities, risk assessments can be conducted for groups of similar facilities, with only the key common risks addressed in the plan. Comprehensive, risk-based scenario planning should provide plan holders better insight into planning for all types and sizes of spills.

3.6.6 Source Control Planning and Coordination

Source control refers to efforts to stop the source of the discharge, which can include uncontrolled well flow, pipeline leaks, tank or piping leaks, and other spill sources. The technical aspects of source control, particularly for well control, have typically been covered by separate plans and involve activity that would be performed by specialists using equipment and procedures beyond the scope of most oil spill response plans. The technical specifics of well control should remain outside the scope of an oil spill response plan. Plan holders may address asset-specific source control procedures (other than well control) in the oil spill response plan, or utilize separate source control planning documents, referenced by, and consistent with, the oil spill response plan. At minimum, the oil spill response plan should clearly describe overall aspects of the plan holder's source control procedures and resources, as they are a critical and integral part of the overall response that must be closely coordinated.

3.6.7 Initial Response Procedures

There should be an increased focus on the initial response actions that should be taken in the first minutes or hours of the incident. This includes specific initial checklists for on-site responders and Incident Management Team members. Initial response procedures would address spill assessment, safety, notifications, available resources, sensitive areas that could be impacted within 24 hours of a discharge, and other key information needed to begin an effective response.

3.6.8 Oil Characteristics and Fate

It is critical for oil spill planners and responders to understand the amount of oil involved in the spill, and how that volume will change as the spill weathers in the marine environment. It is equally important to track the amount of oil recovered or otherwise removed from the environment. Information should be included on the characteristics of the specific oils produced or handled at each asset, and tools should be

provided for estimating/predicting changes in oil volume, character, and fate over time. This information is essential during plan development to determine the quantities and capacities of spill response resources that should be available in the event of a spill, and is used for daily planning purposes during an actual response.

3.6.9 Unified Command and Integrated Response

Unified Command is a necessary and effective response management philosophy that has served industry and the public well in oil spill incidents. Close cooperation between industry and government in response planning leads to better coordination when a spill occurs. Plan holders should explain the Unified Command environment in as much detail as necessary to build and maintain an effective joint response management relationship.

3.6.10 Response Information Management Systems and Situational Awareness

Efficient use of resources is a critical component of response management, and having a clear picture of the location of resources, response activities, sensitive areas, etc., and their status (i.e. situational awareness) is essential for offshore oil spill response. Methods for facilitating situational awareness are generally dependent on the incident scope and needs, and range from a simple map to a sophisticated web- and GIS-based common operating picture. The use of a common operating picture should be coordinated with the overall response management system and response documentation forms. Information should also be provided on how external parties can access the common operating picture and what types of information will be available for viewing.

4 Oil Spill Response Plan and Quick Guide Templates

4.1 Purpose

The Oil Spill Response Plan Template in Annex A and the Quick Guide Template in Annex B are designed to assist plan holders in developing functional response documents. The section order, numbering, format, and content provided in the templates are recommendations for the structure of completed documents. Examples of figures and tables are included to suggest methods of effectively communicating concepts, data, and information. Plan holders may, at their discretion, re-order, add to, or remove the recommended sections or content in the templates.

4.2 Template Use

Each template section begins with a “Section Purpose” that provides a summary of what information should be included in that section, as well as a brief explanation why the information should be included. This is followed by a recommended order of subsections, each with a brief explanation of their content. The Section Purpose is, however, only intended as an inform to the plan writer and not meant to be incorporated in the plan itself. In some sections, considerations are provided regarding the types of information to include and/or approach the plan writer should take when completing the section. Examples of specific content based on best practices or other industry guidelines are included where appropriate. It should be noted that all section, figure, and table number references in the templates are for that template and not to sections in this portion of the document.

4.3 Tables and Figures

The tables and figures included throughout the document are samples intended to inform the plan holder on the content and how it should be presented or formatted. When developing an actual oil spill response plan, these sample tables and figures should be modified to accurately represent the plan holder's covered operations and oil spill response policies and procedures.

4.4 Appendices

The appendices in the Oil Spill Response Plan Template are organized in the same manner as sections mentioned above, with a “Purpose of this Appendix” component at the beginning of each appendix, followed by the sub-appendices at various levels along with the suggested content and numbering scheme. Plan holders may include additional appendices as needed to fulfill regulatory requirements or add useful information.

Annex A (informative)

Offshore Oil Spill Response Plan Template

1 Policy, Responsibility, and Planning Systems

Section Purpose: To explain the purpose and scope of the oil spill response plan and provide users clarification on its intended use. This section describes the plan holder's commitment to effective oil spill response and protection of health, safety and the environment. It also provides summaries, where applicable, of plan holder policies regarding health and safety, response priorities, and other response program-related information. It should describe relationships to other related plans, the operations and geographical area covered by this plan, and regulatory requirements the plan is intended to satisfy.

1.1. Introduction

Explain that the oil spill response plan provides the plan holder's response personnel and Incident Management Team with information and guidance for responding to oil spills. The plan identifies potential types and magnitudes of oil spills covered, and their relative potential impact. It provides key steps for initial actions, notification procedures, and important safety information. The plan establishes the Incident Management Team, lists oil spill response resources, identifies the Spill Response Operating Team, describes response facilities, and provides information on implementing oil spill response strategies.

Explain that the plan is consistent with associated operational documents for offshore oil and gas operations such as Permits to Drill, Offshore Development Plans, Environmental Impact Assessments and others as applicable.

Explain that in the event of an actual spill, this oil spill response plan cannot guarantee that all discharged oil will be recovered, or that all sensitive area protection strategies will be successful. However, that the plan incorporates practical information to help achieve the best response possible. Consider including a disclaimer indicating the plan provides guidance on the actions generally taken during a response and the recommended sequence but is not a guarantee they will be implemented exactly as described in the plan.

1.2. Scope

1.2.1. Applicability and Exclusions

Describe the general types of assets and activities/operations covered by the oil spill response plan, as well as any exclusions or limitations of the plan applicability. Refer to **Appendix A** for detailed asset information.

1.2.2. Geographic Response Area

Identify the geographic response area covered by the oil spill response plan. Include a map of the geographic response area boundaries and asset locations (or groups of asset locations) covered by the plan. The geographic response area would include all waters and shorelines that could be threatened by a spill from the offshore assets within a reasonable amount of time. Consideration should be given to utilizing worst-case discharge trajectories from representative assets to bound the geographic response area.

1.3. General Pattern of Spill Response

Describe that the plan organization is aligned with the typical pattern of oil spill response from detection through incident termination, as well as the types and sequence of activities that will normally occur over the duration of a response. Consider including a flowchart and/or diagram such as the example flowchart provided in **Figure 1-1**.

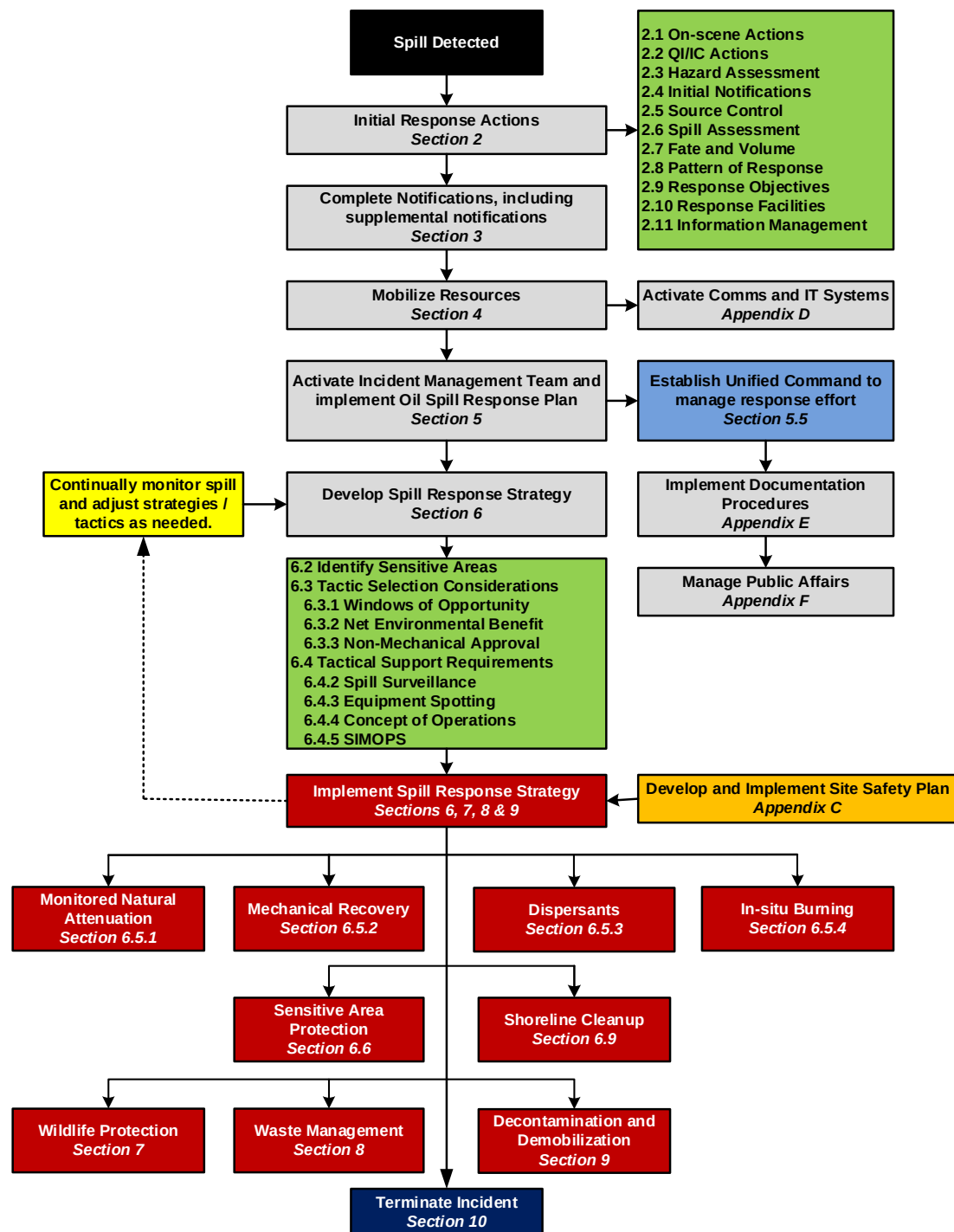


Figure 1-1—General Pattern of Oil Spill Response

1.4. Multi-Tier Oil Spill Response Philosophy

Describe the plan holder's multi-tier oil spill response philosophy. This description should include a definition of each tier level. Response tiers applicable to the plan holder are identified in the risk assessment process, as discussed in **Appendix B**.

A suggested three-tier response planning structure is as follows.

Tier 1—Minor spills, including incipient spills that are quickly controlled, contained, and cleaned up using local (on-site or immediately available) equipment and personnel resources. For offshore assets, local resources could include those at the asset, on nearby support vessels, or at a designated shore support base or staging area. A Tier 1 spill would typically be resolved within a few hours or days.

Tier 2—Moderate spills, with a controlled or uncontrolled source, requiring activation of significant regional (e.g. Gulf of Mexico) oil spill response resources and all or most of the Incident Management Team. A Tier 2 spill response may continue for several days or weeks.

Tier 3—Major spills, with a controlled or uncontrolled source, requiring activation of large quantities and multiple types of response resources, including those from out of the region, and possibly international sources. The entire Incident Management Team would be required, and would likely be supplemented by outside entities. A Tier 3 spill response may continue for many weeks or months.

1.5. Policy

1.5.1. Health, Safety, and Environmental Policy

Include a short summary of how the plan holder's health, safety, and environmental policy applies to oil spill response. Explain the plan holder's commitment to respond to oil spills in a safe and environmentally responsible manner.

1.5.2. Response Priorities

Generally describe the plan holder's priorities of emergency and oil spill response (safety, environment, source control, property, etc.) and how response decisions are made in accordance with those priorities. Explain how adherence to these priorities will help guide decision-making in oil spill response.

1.6. Response Plan Relationships

1.6.1. General

Briefly describe the relationship of this oil spill response plan to other internal and external response plans that may be utilized or accessed during an oil spill response. Consider including a chart or diagram indicating the relationships of these plans.

1.6.2. Emergency Response Plans

Include a description of how the oil spill response plan relates to other, separate emergency response plans that may be implemented concurrently, such as:

- a) Incident and/or Crisis Management Plan
- b) Offshore Facility Emergency Evacuation Plan

- c) Worksite Emergency Action Plan(s)
- d) Source Control Plan(s)—tanks, piping, process equipment, etc.
- e) Source Control/Well Containment Plan— subsea and surface wells/equipment
- f) Fire and Salvage Plan
- g) Hurricane Plan
- h) Business Continuity Plan
- i) Bridging documents

1.6.3. National Contingency Plan

Describe the overall response structure and procedures of the U.S. National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300). Include a brief discussion of a response to a spill of national significance and how it would impact the organization of the Incident Management Team, if such a spill is possible based on the plan holder's hazard/risk analysis.

1.6.4. Area Contingency Plans

Describe how the oil spill response plan is consistent with applicable Area Contingency Plans. List all Area Contingency Plans applicable to the scope of this oil spill response plan, with links or references to their location. Use specific references to applicable content that is of particular relevance to this oil spill response plan.

1.6.5. State and Local Government Plans

List and describe any applicable state or local government oil spill response plans or emergency procedures, and how they may be used in an oil spill incident by responding officials.

1.6.6. Bridging Documents

If the oil spill response plan will cover operations that involve third-party drilling rigs or other vessels/facilities, briefly describe how bridging documents will be utilized to pre-define coordination of response activities, including notifications, between the third party and the plan holder.

1.7. Contracted or Available Response Resources

List and describe any contracts, mutual aid agreements, or other binding arrangements to gain access to oil spill response equipment and other resources that are designated to respond to spills from the asset or group(s) of assets covered by this oil spill response plan. Reference the location of such documents and who (by title) is responsible for their maintenance. Alternatively, and if allowed by regulation, include a signed certification that all necessary oil spill response resources are available by contract or other means, to the extent required by applicable regulations.

1.8. Plan Distribution, Review, and Update

1.8.1. Review and Updating Procedures

Describe plan review requirements (including verification of contact lists and phone numbers), titles of persons responsible for this review, and the review frequency. Include any applicable internal updating or regulatory resubmittal requirements, as well as procedures for revising or updating the plan. Consider developing requirements to review plan content following exercises or actual incidents to ensure deficiencies are corrected and lessons learned are captured.

1.8.2. Record of Amendments

Include a form for documenting the date, description of changes, and person conducting plan updates or revisions.

1.8.3. Plan Distribution

Describe how the oil spill response plan is controlled and distributed, both internally and externally. Also describe how plan updates are distributed to plan holders. Include a table that indicates the locations and owners of plan copies, including the controlled version.

1.8.4. Electronic Plan Access

If the plan will be available electronically, provide appropriate links and instructions for electronic access. Identify the persons to contact for electronic access and their contact information.

2 Initial Oil Spill Response Actions

Section Purpose: To provide key information and guidelines on initial oil spill response actions for first responders (i.e. asset response personnel, Qualified Individuals, and Incident Commanders). These actions should be provided in the general sequence required during a response. Decision guides and checklists should be used whenever possible in lieu of text.

This section should contain the critical information typically required in at least the initial response period or Reactive Phase (i.e. 24–72 hrs.) when the response to most Tier 1 spills will be completed or begin escalating to a Tier 2 or 3 incident. Supplemental response information in the appendices or other documents can be referenced as necessary. The response will then likely transition to the Proactive Phase, wherein Unified Command will be established and begin to direct response activities based on incident circumstances and site-specific conditions. Therefore, it is less critical for detailed response actions to be included in the plan for these later periods, although most other response plan information will still be utilized to inform and support ongoing response activities.

2.1. On-Scene Initial Response Actions

Provide guidelines for the actions to be taken by on-scene personnel immediately upon discovery of an oil discharge, including a quick situation size-up and identification of actual or potential health and safety hazards. Include a flow/decision response strategy guide depicting the initial actions in a prioritized sequence, such as the example provided in **Figure 2-1**.

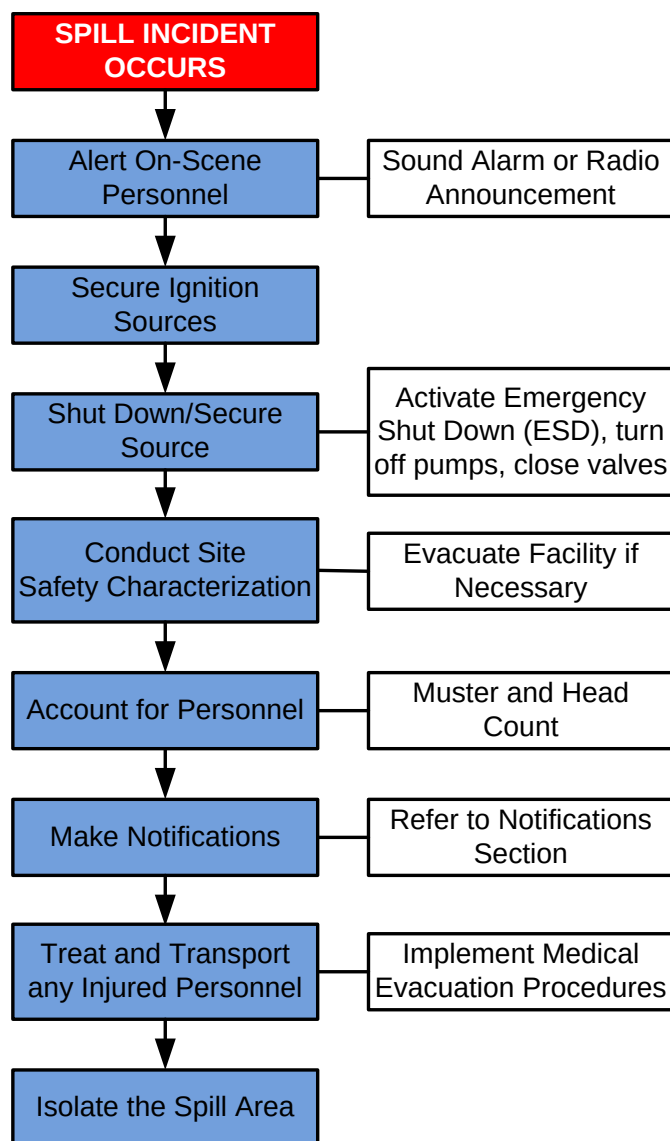


Figure 2-1—On-Scene Response Actions Sample Flowchart

Provide a checklist depicting prioritized initial actions that asset personnel could utilize to ensure key initial response actions are implemented or considered, such as the example in **Table 2-1**.

Table 2-1—Example On-Scene Initial Response Actions

On-Scene Initial Response Actions
Describe the roles of asset personnel at the scene of the incident, including their objectives to save lives, make initial notifications, control the source if safe to do so, and contain the spill if possible. Especially describe the role of the person in charge or senior person available.
Person detecting spill: ☐ notify the person-in-charge; ☐ alert asset personnel/sound alarms; ☐ secure sources of ignition; Person-in-charge: ☐ conduct site safety characterization (hazard assessment), including air monitoring; ☐ evacuate or shelter in place as appropriate; ☐ account for all personnel; ☐ activate asset emergency or spill response operating team (if any); ☐ initiate source control actions (activate emergency shutdown, close blowout preventer, turn valves, shut down pumps, shut down power) ☐ activate firefighting systems or resources if needed; ☐ identify product and estimate quantity or rate of oil released; ☐ complete the Spill Report Form (if time permits); ☐ notify the Qualified Individual and/or Incident Commander; ☐ determine number and severity of injuries and request on-site medical assistance (if any); ☐ secure the spill area (establish exclusion zone); ☐ conduct preliminary incident severity/potential assessment; ☐ implement other asset-specific response procedures.

2.2. Qualified Individual or Incident Commander Initial Actions

Provide checklists for the Qualified Individual, Incident Commander, and/or designated person responsible for initiating notifications and activating first responders. In some cases, the Qualified Individual may also be the Incident Commander, and these actions would apply to both. The checklist would include initial response actions such as notifications, mobilization of oil spill removal organizations, interfacing with government officials, and activating the Incident Management Team. The checklist should follow the intent of any applicable regulations, as well as plan holder policy and procedures. An example is provided in **Table 2-2**.

Table 2-2—Qualified Individual or Incident Commander Checklist

Qualified Individual or Incident Commander
Describe how the Qualified Individual or Incident Commander (QI/IC) serves as the point of contact for notification of spill events requiring response. The QI/IC receives the initial report of the incident and ensures that emergency resources are mobilized. The QI/IC ensures agency notifications are completed as required. The QI/IC is authorized to commit funding for oil spill response and source control resources.
☐ Upon notification of incident, obtain critical information, including: • Personnel status • Number and types of injuries • Evacuation status • Immediate assistance required • Environmental status (i.e. spill data) • Condition of asset (damage) • Status of operations • Actions taken by asset responders • Response resources available or en route ☐ Prepare a Spill/Incident Report Form for initial notification, if necessary ☐ Ensure all required agency notifications are completed ☐ Serve as initial point of contact with agency response personnel ☐ Notify the Incident Commander (if different from QI) ☐ Recommend level of response required based on initial reports ☐ Consider how the situation could escalate and respond accordingly to the incident potential ☐ Engage with the Incident Commander or Unified Command to: ☐ Authorize funding of response resources ☐ Review site hazards and weather conditions ☐ Communicate the response priorities and objectives ☐ Discuss resources available or en route ☐ Determine what additional resources may be mobilized ☐ Attend the initial incident briefing ☐ If requested, and if appropriate, serve as representative in the Unified Command ☐ Continue to coordinate response activities until relieved ☐ Advise the Incident Commander or Unified Command on response strategies and progress ☐ Document all actions and conversations on the ICS 214 Unit Log ☐ Attend all team briefings until demobilized

2.3. Hazards Assessment

Provide specific procedures for conducting air monitoring and other hazard assessment activities prior to any personnel entering the spill area (exclusion zone). Decision guides and checklists should be used where practical to describe the typical release/hazard assessment activities. Criteria and procedures for evacuations, shelter in place, and other actions to protect the health and safety of on-site personnel should also be included. The initial site hazard assessment would be the first step in developing an incident-specific Site Safety and Health Plan.

Include information on oil spill inhalation hazards (such as hydrogen sulfide and benzene), immediate personnel protection strategies, and references to safety data sheets. This section should be specific to the products handled at the asset or groups of assets. Appendix C can be referenced for additional health and safety information.

2.4. Initial Notifications

Describe the need to begin making notifications both internally and externally as soon as practical. Even though the complete notification details and additional information/guidance is located in Section 3, this sub-section is located here to ensure it is not overlooked. Discuss how initial information is compiled by on-scene personnel for inclusion in the spill report form, and how the form is transmitted.

2.5. Source Control Actions

2.5.1. General

Provide an overview of the applicable methods, strategies, and resources to control the source of operational spills, and if applicable, the initial actions of a loss-of-well-control incident. Reference a separate source control/well containment plan and other related documents, if any, for information on sustained source control operations. Include an overview of how source control operations will be managed and coordinated by the Incident Management Team, either as a separate Source Control Section or a Source Control Branch under the Operations Section.

If the plan holder has no separate source control or emergency well control plan(s), that information should be included in this section. Use the information gathered in the risk assessment (**Appendix B**) to identify potential scenarios involving source control to inform the development of this section.

Reference **Section 6.4.5** for information on simultaneous operations and **Section 5.3.4** for organization of the Source Control team.

2.5.2. Production Asset

Generally describe source control strategies for discharges from hoses, pipes, storage vessels/tanks, process equipment, risers, conductors, hydraulic equipment, fuel/lube tanks, etc., on production assets covered by the oil spill response plan.

2.5.3. Pipeline/Flowline

Generally describe source control strategies for discharges from pipelines and flowlines covered by the oil spill response plan. This includes subsea flowlines, lease pipelines, and Right-of-Way (ROW) pipelines. Reference applicable documents if available, or include specific pipeline/flowline source control strategy information in this section.

2.5.4. Well

Generally describe source control strategies for discharges from oil/gas wells covered by the oil spill response plan. Reference a separate source control plan, if available, or include specific information in this section. Such information may include:

- a) activation of well closure devices;
- b) well intervention procedures;

- c) well capping and containment plans;
- d) relief well plan;
- e) organization of Source Control Branch or Source Control Section.

2.6. Spill Assessment

2.6.1. General

Provide an overview of how to assess the oil spill's characteristics and track its movements through spill volume estimations, visual observations, trajectory modeling, and/or aerial or vessel surveillance. Explain how spill assessment results will guide the Incident Management Team in developing the most appropriate response strategy and associated resource requirements. Explain how trajectory modeling is used to anticipate the path of the spill and identify sensitive areas within the potential impact area.

2.6.2. Initial Assessment Activities

Provide spill assessment instructions to those who may be the first to observe the spill, such as asset personnel, nearby vessels, or nearby aircraft. Include instructions for identifying the source of the spill, type of oil, status of discharge (continual or instantaneous), amount of spreading or containment, and size/color of slick.

2.6.3. Spill Volume Estimation

Include instructions on estimating and communicating the spill volume during the initial reporting phase, and include any follow-up reports that may be provided. Provide instructions on using direct measurement when possible, and/or engineering calculations to arrive at an estimate. Explain that most estimates, particularly those based on visual observations, have a high level of uncertainty due to their subjective nature and the limitations of estimation tools.

Describe the chosen methodology and tools that will be used to estimate the spill volume during the initial response. Consider inserting color-metric graphs, pictures, instructions, a sample spill volume estimation chart, and/or other tools from recognized standards.

Sources of color-metric oil spill volume methodologies include:

- a) Bonn Agreement Oil Appearance Code (BAOAC), May 2, 2006
- b) ASTM F2534-12 Standard Guide for Visually Estimating Oil Spill Thickness on Water
- c) U.S. Coast Guard Incident Management Handbook, February 14, 2013

Explain the need to report oil spill volume calculations as estimates, and that it is generally advisable to provide a range of possible volumes versus a specific volume estimate due to the operational, political, and public perception implications of under- or overreporting using a specific volume.

2.6.4. Oil Spill Trajectory Modeling

Describe how the Incident Management Team will gather necessary information and conduct oil spill trajectory modeling during an actual spill. **Appendix B** should be referenced for any pre-spill trajectory modeling that was conducted that could be used to make initial assumptions on oil spill migration. Include

step-by-step instructions on how to mobilize the appropriate oil spill trajectory modeling resources and initiate the process. The following topics should be included:

- a) guidance for initial responders on estimating spill trajectories using vector addition, including instructions and graphics, and referencing any tools or software available to the plan holder;
- b) identifying who will initiate and coordinate oil spill trajectory modeling for the incident;
- c) identifying the source of metocean data that can be used as model inputs;
- d) identifying internal or external resources (consultants, government, academia, etc.) that can conduct computerized trajectory modeling (reference **Section 4.1** for trajectory service contact information);
- e) including data forms for submitting trajectory modeling requests as appropriate.

Explain that spill trajectories have questionable reliability beyond 24 to 48 hours from completion, but are useful for identifying potentially impacted sensitive areas, developing a response strategy, and planning resource deployments.

Reference **Appendix B, Section B.7** for historical metocean data that can be used as trajectory model inputs if real-time data is unavailable.

2.6.5. Oil Spill Surveillance and Tracking

Generally describe that aerial and/or vessel surveillance of oil spills is required to track movements and changes in slick size and characteristics to inform response planning and validate trajectory models. Refer to **Section 6.4.2** for more detailed information on surveillance, tracking, and aerial spotting.

2.7. Oil Weathering, Fate, and Volume Tracking

2.7.1. Oil Weathering and Fate

Describe that after oil is spilled into the environment, a wide variety of natural physical, chemical, and biological processes (collectively known as “weathering”) can significantly affect the volume and viscosity of floating oil, which can influence the type and number of required response resources. Some of these processes (evaporation, natural dispersion, dissolution, etc.) may reduce the volume of oil on the water’s surface while others (emulsification) may increase volume. Emulsification can also increase oil viscosity—requiring specialized pumping/oil transfer equipment—and can affect the applicability of mechanical recovery, dispersants, and in-situ burning. Describe how the ICS 209 Incident Status Summary form should be updated periodically to reflect these changes in oil volume and character.

“Know your Oil” (i.e. how oils produced or handled at each asset are predicted to weather over time) is an important part of the oil spill planning process, and responders may save valuable time and resources by knowing this information in advance. Explanations should be included of how physical and chemical properties (e.g. specific gravity, viscosity, pour point, solubility, volatile and asphaltene content, etc.) of individual oils will change as the oil weathers, as well as how this affects the oil’s behavior on the water and the applicability of various response options. Describe the methodology in place to predict changes in the volume of surface oil due to weathering, such as computer modeling tools. If weathering/fate and persistence studies (physical or modeled) have been conducted on the oil handled by the covered assets, the results should be summarized in this section. Reference **Appendix A** for additional physical and chemical property information for oils handled at operational assets.

2.7.2. Removal Actions and Volume Tracking

Provide guidelines on gathering and tracking data to calculate remaining spill volume balance as response actions are performed, including removal volume in the following categories (as appropriate):

- a) weathering—evaporation, biodegradation, natural dispersion, dissolution, sedimentation, etc.
- b) dispersant application—subsea, surface, aerial (it is suggested that these be separated where possible);
- c) in-situ burning;
- d) mechanical recovery;
- e) direct recovery (well flow-back and capture, pumping, or transfer);
- f) shoreline oil recovery.

Describe how these calculations can be used in the planning process to more accurately estimate the quantity of resources required to implement various response options.

For mechanical recovery operations, include guidelines on tracking volumes of recovered oil in temporary storage for each response period. Include guidelines for determining and tracking the amount of oil in oil/water mixtures that are typically associated with mechanical recovery operations.

Oil fate and recovered oil volume projections can be used in the planning phase to identify response strategies, estimate their effectiveness, and determine the associated resources required for implementation. Estimations of response strategy effectiveness can be made or modeled, and when coupled with changes in oil volume due to weathering, resource requirements can be adjusted up or down, depending on the combined oil volume being removed. **Table 2-3** provides an example of how this combined oil volume reduction can be tracked and displayed to assist the planning process. If utilized, this volume projection method, as well as assumptions and results, should be described in this section. This information is commonly displayed in the ICS 209 Incident Status Summary.

2.7.3. Subsea Oil Discharge Fate and Volume Tracking

The types of information that are needed to calculate the fates and volumes of oil for a subsea oil discharge (subsea blowout or other types of subsea discharges) should be identified in this section, and often include, but are not limited to, the following:

- a) release rate;
- b) oil type;
- c) gas-to-oil ratio;
- d) depth of the water at the wellhead;
- e) temperature of the oil being released;
- f) inside diameter of the well pipe.

Specialists used in determining release rates should be identified in **Section 4.1**. Include formulas, worksheets, and other planning tools that will be utilized as appropriate and available.

Table 2-3—Sample Oil Volume Tracking Table

Oil Spill Volume Tracking <i>(Specify Units—Barrels, Gallons, Cubic Meters)</i>			
	Operational Period One	Operational Period Two	Operational Period Three
Spill volume at beginning of operational period			
Instantaneous or continual discharge volume			
Total Discharged			
Volume Enhancers (add to total discharged volume)			
Emulsification volume increase			
Total Oil Spill Volume			
Volume Reducers (subtract from total oil spill volume)			
Volume removed by direct recovery			
Volume removed by subsea dispersant application			
Volume removed by subsea natural dispersion			
Volume removed by surface evaporation			
Volume removed by surface biodegradation/ dispersion			
Volume removed by surface dispersants			
Volume removed by mechanical recovery			
Volume removed by in-situ burning			
Volume removed by shoreline recovery			
Spill Volume at End of Operational Period			

2.8. Response Objectives and Strategies

Discuss how response decisions are made in accordance with the plan holder's policies and priorities, along with guidance and direction from the Unified Command. Provide a list of possible oil spill response objectives and their corresponding strategies, based on general patterns of a typical response discussed previously in **Section 1.3**. An example is provided in **Table 2-4**, which contains an abbreviated list of response objectives and related strategies.

Table 2-4—Example List of Response Objectives and their Related Strategies

Response Objectives	Related Strategies
Ensure the safety of asset personnel, response personnel and the public	Account for all personnel on-scene
	Identify hazards of any spilled material, including fire potential
	Consider evacuations as needed
	Monitor air in affected areas
	Develop site safety and health plan for response personnel
Search and rescue	Evacuate victims to medical transfer areas or facilities once rescued from immediate peril
	Establish medical triage along with transport to hospital
	Conduct joint agency search and rescue efforts
Control the source of the incident	Complete emergency shutdown
	Conduct firefighting and initiate temporary repairs
	Transfer product to other storage vessels/tanks
Manage a coordinated response effort	Complete or confirm notifications
	Establish a unified command organization and facilities
	Initiate spill response Incident action plans
	Ensure response resources mobilization and tracking
Minimize environmental impacts	Track oil spill movement and develop spill trajectories
	Identify resources at risk in spill vicinity
	Perform net environmental benefit analysis
Treat, or contain and recover spilled material	Prepare and implement dispersant plan if appropriate
	Conduct open-water skimming with vessels
	Prepare and implement in-situ burn plan if appropriate
Keep the public and stakeholders informed of response activities	Prepare news releases
	Establish a Joint Information Center
	Conduct regular news briefings
	Conduct public meetings as appropriate

2.9. Response Facilities

Provide a list and description of the plan holder's pre-designated onshore incident command posts, staging areas, forward command posts (fixed or floating), incident/crisis centers and other response facilities. Consider including a table that identifies each facility, its purpose, description, contact numbers, address, and, if necessary, any activation procedures required for these facilities. See [Table 2-5](#) for a sample table.

Table 2-5—Sample Response Asset List Table

Facility Name	Purpose	Description	Location and Contact Numbers	Activation Procedure

2.10. Response Information Management

2.10.1. Information System

Describe the use of the response information system(s) available to the plan holder that allow efficient development of Incident Action Plans, and how such systems will be utilized by the Incident Management Team. Include electronic links to such systems and where logon information will be maintained. Identify the persons or organizations who can assign logon information or assist with access to the system.

2.10.2. Situational Awareness/Common Operating Picture

Describe how the Incident Management Team will maintain situational awareness of the incident and tactical response operations. If a “common operating picture” will be utilized, list all equipment and resources, including any third-party vendors, who will track and display response activities. Include a discussion of any technologies that will be utilized, such as GIS mapping systems, vessel Automatic Identification System, etc.

Elements that are typically displayed in a “common operating picture” include, but are not limited to:

- a) involved-asset location;
- b) nearby facility locations;
- c) locations of initial incident, current oil slick, and predicted trajectory;
- d) locations and status of major response resources;
- e) sensitive area information;
- f) “areas of operation” boundaries (i.e. source control, high-volume skimming, dispersant, etc.);
- g) jurisdictional boundaries (i.e. federal agency jurisdiction, state waters, military areas, shipping lanes, etc.);
- h) operational limitation areas (such as dispersant pre-approval zones);
- i) navigational aids;
- j) water depths;
- k) metocean data.

Describe how and what situational information will be provided to government agencies and the public, such as current spill and response activity status, trajectories, and safety and security related information. Reference **Appendix D** for IT requirements.

3 Notification Procedures

Section Purpose: To provide a single location in the plan that contains all information and guidance on internal and external oil discharge notifications. A notification flowchart and contact directory should be placed near the front of the section for quick access, followed by detailed contact and other information related to internal and external notification requirements and procedures. Contact information for oil spill removal organizations, equipment suppliers, support services, subject-matter experts, and other resources is provided in **Section 4.1**. This section may be marked with a high-visibility colored divider tab to draw the user's attention in an emergency.

3.1. Notification Procedures

Provide a narrative of the notification process, timeframes, and responsibilities, followed by a notification flowchart or decision tree and sequence of notifications (see example in **Figure 3-1**). Provide clear instructions on external oil spill reporting and notification requirements based on the asset's location and federal, state, and local regulations, as well as who is responsible for making the notifications.

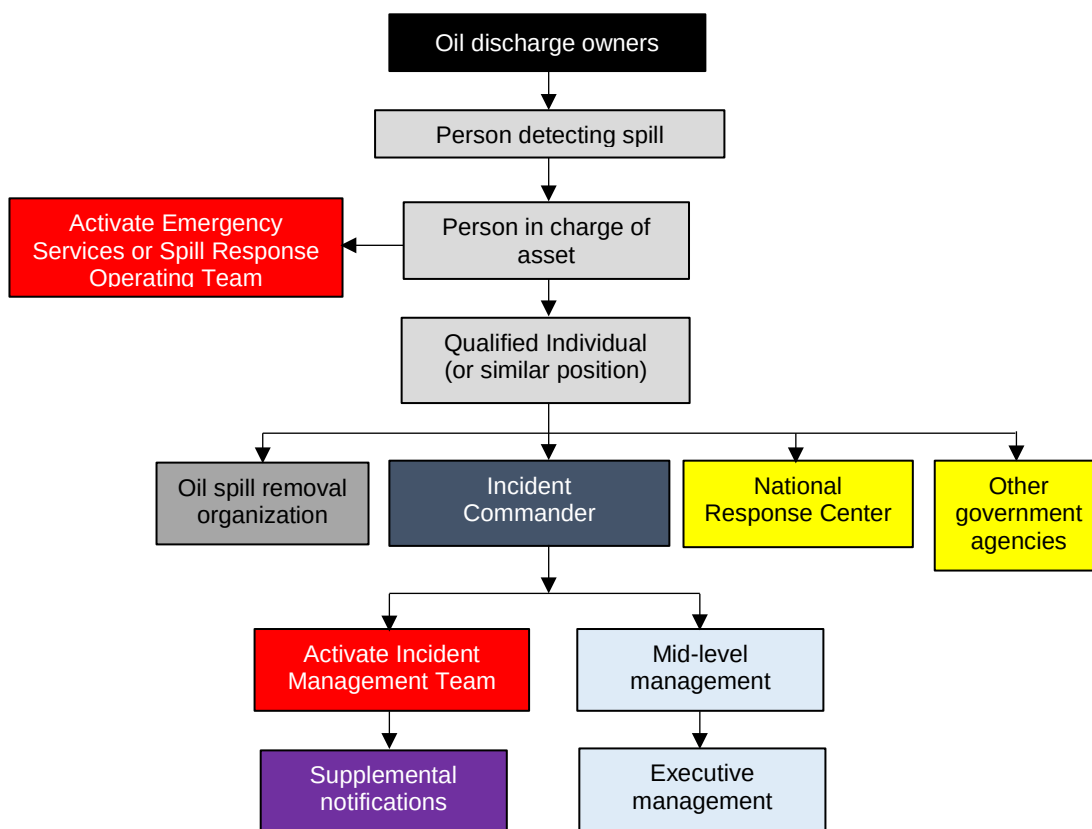


Figure 3-1—Sample Notification Flowchart

3.2. Notification Contact List

Provide a contact directory using a format similar to the template provided in **Table 3-1** for the internal and external individuals and organizations to be notified in the event of an oil spill. These parties should be grouped and displayed in the general order in which notifications would occur. Examples of common entities and a suggested notification sequence:

- a) asset personnel, including any on-site response team;
- b) Qualified Individuals and/or Incident Commanders;
- c) emergency service providers (i.e. medical evacuation)
- d) federal agencies (required notifications);
- e) state agencies (required notifications);
- f) local agencies (required notifications);
- g) Incident Management Team members;
- h) other regulatory agencies/government officials (as appropriate);
- i) adjacent/nearby facilities (or reference external source of this information);
- j) plan holder's management/executives;
- k) supplemental contacts.

In addition to the name and contact information for each individual or organization, the timeframe by which they should be notified, if applicable, should be included in the directory. Any instructions or notes on making those notifications or what information is to be provided should also be included where appropriate.

3.3. Notification Forms

Briefly describe internal and external notification forms that should be used to capture information required for verbal and written notifications. Include copies of the blank forms as figures or an attachment at the back of this section and/or directions to access electronic report forms. Consider pre-populating the forms with static information to expedite their completion during an emergency. Refer to **Appendix E** if notification forms will reside there.

On the plan holder's notification form, include a note that notifications should not be delayed while gathering additional information.

Table 3-1—Sample Notification Contact List

Asset Contacts			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Qualified Individuals			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Emergency Services			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Incident Commanders			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Federal Agencies			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
State Agencies			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Local Agencies			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Adjacent Facilities			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Incident Management Team			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Executive Management			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes
Supplemental Contacts			
Name, Organization, Location	Phone Numbers	Time Frame ¹	Instructions/Notes

1: If applicable

3.4. Notification Requirements

3.4.1. Internal Reporting Requirements

Describe in detail the plan holder's internal oil spill notification requirements and procedures for both verbal and written reports.

3.4.2. Government Reporting Requirements

List and explain in detail the applicable verbal and written regulatory/governmental notification and reporting requirements. Consider providing a decision diagram containing the sequence and requirements for various scenarios, as appropriate, depending on:

- a) spilled/released material (oil, refined products, gases, etc.),
- b) impacted media (water, air, land), and
- c) spatial extent (on-site, offsite, local community, etc.).

3.4.3. Supplemental Notifications

Include a discussion and detailed information on the criteria for any necessary supplemental notifications depending on the location, trajectory, size and scope of the spill. Examples include:

- a) supporting regulatory agencies (as appropriate);
- b) federal and state trustee agencies;
- c) local sensitive-area managers (water intakes, marinas, wildlife refuges, parks, etc.);
- d) community/political contacts;
- e) nongovernmental organizations;
- f) key stakeholder groups, as appropriate.

3.5. Incident Management Team Alert Procedures

Describe how the Incident Management Team is alerted and activated to respond. Include any descriptions of call trees, mass notification systems, or other communication systems used to activate the team.

Refer to **Table 3-1** for a contact list (by name and team position) for the Incident Management Team.

4 Response Resources

Section Purpose: To provide a consolidated location in the oil spill response plan that identifies all essential spill response resources (equipment and personnel) that could be utilized in an incident. Contact information for each resource or service provider is provided near the front of the section for quick access. Resource lists are included (or referenced) to provide information on the types and quantities of available resources, along with their activation details, intended use, limitations, and mobilization timeframes. This information facilitates the selection of the most appropriate resources for

initial response. Sources of spill response technical expertise should also be identified to serve as advisors and to fill specialized roles in the response. Well capping and containment equipment, other source control equipment, specialized contractors and the use of non-traditional resources such as vessels of opportunity and volunteers should be identified and discussed in this section. Detailed information on these types of resources may be referenced if included in other response plans or external documents.

4.1. Resource Contact List

Provide a contact list (phone directory) of the essential oil spill response resource providers that could be utilized in a response. Include the type of resource, company name, primary contact person's name, location, and phone numbers (including primary, 24-hour, and secondary numbers). Oil spill removal organizations and other vendors under pre-existing contracts should be identified as such in the list. Examples of the types of supply and service providers are provided below in nonprioritized order and include, but are not limited to:

a) First-call resources

- primary oil spill removal organizations;
- search-and-rescue services;
- surveillance and tracking (aircraft, drones, aerostats, remote sensing);
- spill trajectory specialists;
- medical services (ambulance and hospitals);
- vessels;
- dispersant application and monitoring;
- firefighting and salvage organizations;
- wildlife capture and rehabilitation organizations.

b) Supplemental resources

- secondary oil spill removal organizations;
- communications systems;
- waste management contractors and treatment/disposal sites;
- earth-moving equipment (backhoes, bulldozers, front-end loaders, etc.);
- lifting equipment (cranes, forklifts, manlifts, etc.);
- power and lighting equipment (generators, light plants, etc.);
- lodging (hotels, camps, etc.);
- waterfront facilities (shipyards, ports, docks, etc.);

- vessels of opportunity;
- c) Support services
 - subject-matter experts (environmental, dispersant, in-situ burning, and other specialists);
 - medical (ambulance, hospitals, clinics, etc.);
 - fueling;
 - ground transportation (trucks, buses, cars);
 - legal;
 - media consultants;
 - security services;
 - volunteer management;
 - weather forecast specialists.

4.2. Spill Response Resources and Mobilization Times

4.2.1. General

Provide inventory lists or tabular summaries of key spill response resources owned by or available by contract or other agreement to the plan holder. Include the estimated times to mobilize the resources from their storage bases to the offshore location(s) of the asset or groups of assets. Additional detail should be provided for those resources that are readily available and would likely be deployed first in the event of a spill.

Describe how oil spill response resource inventories and their mobilization timeframes are driven by risk assessment and oil spill scenario development, as described in **Appendix B**. Describe how resources were selected for planning purposes based on achieving the most efficient response in relation to the plan holder's potential spill scenarios and anticipated metocean conditions.

4.2.2. Containment and Removal Resource Inventory

Identify and list the primary oil spill removal organizations that are under contract and will provide response resources (boom, skimmers, barges, dispersants, and surface/subsea application platforms, etc.). Describe how they will likely be utilized in a response. For example, due to varying capabilities between oil spill removal organizations, some may be more suited or pre-designated for offshore containment and recovery, whereas others may only provide shoreline cleanup services.

If the plan holder owns oil spill response equipment that will likely be utilized, it should be listed and described in this section.

The containment and removal resource inventory should include key resources (see **Table 4-1**) that could be mobilized to the site(s) in the first operational period to make the plan as stand-alone as possible for the initial response phase. Additional resources and/or master lists of resources provided by oil spill removal organizations, third parties, or Area Contingency Plans can be referenced.

If necessary or useful, the containment and removal resource inventory may also be organized by tier level, with resources identified for each tier of response. Similarly, if multiple pieces of equipment (i.e. containment, recovery, storage, and transfer) are intended to be used together as a system, a new “Systems” category can be added to the table, or a footnote or other means of identification can be added to each piece of equipment to identify components of a recovery or other type of system. This inventory list may be referenced if the information is available on external web links or other documents.

Table 4-1—Sample Oil Spill Containment and Removal Resource List

Oil Spill Containment and Removal Resources							
Containment Boom							
Kind	Type	ID#	Height	Length	Owner	Storage Location	Mobilization Timeframe
Estimated Total							
Oil Spill Removal Vessels (Skimming Vessels)							
Name	Kind	Type	Daily Recovery Rate	Storage Capacity	Owner	Home Port	Mobilization Timeframe
Estimated Total							
Skimmers (deployed on vessels of opportunity)							
Kind	Type	ID#	Recovery Rate	Vessel and Storage Requirements	Owner	Storage Location	Mobilization Timeframe
Estimated Total							
Vessels (other than Oil Spill Removal Vessels)							
Name	Kind	Type	Length	Cargo Capacity	Owner	Home Port	Mobilization Timeframe

Table 4-1—Sample Oil Spill Containment and Removal Resource List (continued)

Oil Spill Containment and Removal Resources							
Aircraft							
Kind	Type	Tail #	Capacity	Range	Owner	Home Base	Mobilization Timeframe
Storage (barges, tanks, towable bladders, etc.)							
Kind	Type	ID#	Volume	Vessel Requirements	Owner	Storage Location	Mobilization Timeframe
Estimated Total							
Dispersants							
Kind	Type	Container Type	Volume	Description	Owner	Storage Location	Mobilization Timeframe
Estimated Total							
Sorbents							
Kind	Type	Quantity	Description		Owner	Storage Location	Mobilization Timeframe
Shoreline Protection and Cleanup							
Kind	Type	Quantity	Description		Owner	Storage Location	Mobilization Timeframe

4.2.3. Mobilization Timeframes

Include tables, diagrams, or charts that explain how mobilization timeframes for key containment and removal resources were determined. Charts with time/distance rings from resource storage locations are helpful. If necessary, include more detailed information on each major resource (such as oil spill response vessels, primary offshore containment boom, dispersant application systems, vessel-of-opportunity skimming systems, in-situ burning systems, etc.) that includes estimates of times needed for:

- procurement of the resource;
- equipment load-out;

- c) travel to the deployment site(s), by region if necessary, or to the most distant asset;
- d) equipment deployment;
- e) total mobilization timeframe.

4.3. Source Control Resources

4.3.1. General

Describe the key resources owned or available under contract to the plan holder for conducting surface or subsea source control activities as applicable. If the plan holder will rely on third-party resources and/or expertise, include a discussion of how the parties will be activated and how their activities will be coordinated with other oil spill response activities.

Due to the significant scope and complexities of conducting subsea source control operations, it is anticipated that a separate source control plan will be prepared, which can be referenced for additional details on resources, deployment procedures, coordination with the spill response, etc.

4.3.2. Source Control Resource List

Include a list of the following types (as appropriate) of resources available to assist with source control operations. Contact information for the following types of providers should be included in **Section 4.1**. Types of source control and support resources include, but are not limited to, the following:

- a) safety specialists and air monitoring services;
- b) divers;
- c) debris removal equipment providers;
- d) subsea dispersant application systems and monitoring equipment providers;¹
- e) engineering vendors;
- f) general repair and construction contractors;
- g) mutual aid or cooperatives;
- h) pipeline repair or construction contractors;
- i) relief well services;
- j) salvage contractors;
- k) well control contractors.

¹ Technically not a source control resource, but often available from same organizations.