

Mr. Mike Faulkner
National Response Team
USEPA Headquarters
OEM/MC 5104A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Faulkner

Section 300.115 of the National Contingency Plan requests that Regional Response Teams (RRT) provide letter reports to the NRT, summarizing recent activities, organizational changes, operational concerns, and efforts to improve state and local coordination. This Caribbean RRT (CRRT) report is submitted for the period of January 1 to December 31, 2014.

Executive Summary: The CRRT does not have any Challenges, Lessons Learned or Best Practices to share at this time from incidents or activities in the region this past year.

I. MAJOR ACTIVITIES

A. Major/Noteworthy Response Activities

Central High School Air Investigation; St. Croix, USVI

On the morning of March 18, 2014, students and faculty at Central High School (CHS), located in Kingshill, St Croix, USVI, were sickened by noxious odors emanating from an unknown source. At least 35 students and one teacher experienced symptoms serious enough to seek medical treatment. Symptoms included fainting, vomiting, rapid breathing and heart rate, dizziness, headache and altered mental status. The incident caused local authorities to close the school. On March 19th, the Virgin Islands Department of Planning and Natural Resources (DPNR) requested technical assistance from EPA to assist in determining the source of the release that affected the occupants of CHS.

Between March 20th and April 4th, EPA conducted an investigation of CHS and the likely potential sources of the odor/chemical release. Based on interviews with hospital staff, CHS students and teachers, and others who experienced the incident, EPA determined that hydrogen sulfide (H₂S) and potentially other reduced sulfur compounds likely caused the odor and the physical symptoms. The investigation focused on the sanitary sewer system at the school and along Centerline Road, and on two potential industrial sources: the Diageo Rum Distillery and the HOVENSA Oil Terminal. The investigation included activities in the following locations: Central High School, the Virgin Islands Waste Management Authority's (VIWMA's) Sewer System at Barren Spot and along Centerline Road, the USVI Territorial Court, Diageo, and HOVENSA.

Inspections, air monitoring, and sampling results did not indicate any evidence of an upset condition or source at Diageo or HOVENSA that could have produced enough H₂S and/or other reduced sulfur compounds to have caused an acute impact at CHS. Additionally, any such source emanating from Diageo or HOVENSA could not have impacted CHS without acutely impacting Diageo or HOVENSA personnel and the residents surrounding and downwind of the facilities. Residents of densely populated communities between the industries and CHS did not complain of odors or medical symptoms on March 18th. Other than people at CHS, only populations associated with the Territorial Court and the Herbert Grigg Home for the Aged, both in Kingshill, complained of H₂S-like exposures. As a result, a sulfur source more local to Kingshill was considered more plausible.

On March 22 and 23, EPA identified a potential local source in the VIWMA sewer system near the Curriculum Center and the Territorial Court. The Curriculum Center or “Transition” manhole is where the force main from the Barren Spot Lift Station discharges sewage prior to it flowing down the gravity sewer line that runs past the Territorial Court and towards the treatment plant located near the airport. This manhole also receives waste from three other gravity feed lines, including one from CHS. Levels of H₂S measured in the “Transition” manhole were observed to exceed 200 ppm. At the Territorial Court manhole just downstream of the “Transition” manhole, levels of H₂S greater than 600 ppm were detected by the National Guard Civil Support Team. EPA also observed strong odors and detected elevated H₂S levels inside portions of the Territorial Court. The presence of such a significant continuously produced source of H₂S less than 1,000 feet from CHS and in close proximity to the Territorial Court and Herbert Grigg Home for the Aged made the sewer a likely potential source of the March 18th release and of subsequent complaints in the Kingshill area. The specific conditions which caused the H₂S gas to migrate to the school are not completely understood; however, the gravity feed line from the school provides a potential pathway to the campus. Additionally, smoke testing revealed multiple venting points throughout the courtyard and classroom area where students and teachers were impacted. Results of interviews conducted during the investigation suggest that there has periodically been a sewer odor at the school, indicating that sewer gas has made its way onto the campus in the past.

Although monitoring at CHS between March 23rd and April 4th did not reveal elevated levels of H₂S on the CHS campus and within its associated sewer system, it should be noted that modifications to the VIWMA sewer system along Centerline Road were being made shortly after EPA initiated its investigation. EPA’s investigation was conducted under different conditions than were present on March 18th. Therefore, the conditions that led to that release could not be replicated nor adequately tested during EPA’s investigation. However, based on all available information, the sewer system was identified as the most likely source of the chemical release that impacted the CHS population.

EPA tasked Weston Solutions, Inc. to evaluate the engineering of this system and make recommendations to remediate the H2S problem. The results of that effort were presented in a report entitled “Engineering Analysis of the St. Croix Central High School Exposure Event of 18 March 2014.” In summary, recommendations for the future protection of CHS included pretreatment of the wastewater at the lift station to reduce H2S formation; cleaning of the inside of the force main and any other activities necessary to increase flow rate and reduce residence time in the force main; addition of an air relief valve on the lift station discharge pipe to prevent air binding; thorough testing of the CHS sanitary system and repair of all defects that could allow sewer gas to escape; and construction of a “weir structure” to prevent potential migration of sewer gas into the CHS system. In addition, the separation of the CHS gravity feed line from the force main “Transition” manhole Court was recommended. Eventual decommissioning of the Barren Spot Lift Station as a long term plan was also recommended.

Additional information can be found at <http://epaossc.org/CHSSTXAI>

M/V BRIAUSTAT; San Juan, PR

On April 21, 2014, Sector San Juan received a report of a submerged vessel that was discharging diesel into San Juan Harbor at Centro Pesquero, San Juan, Puerto Rico. Sector San Juan pollution responders and members of the Puerto Rico Environmental Quality Bureau arrived on scene and witnessed the M/V BRIAUSTAT, a 37 foot fiberglass fishing vessel, partially submerged at the pier discharging diesel and other waste oils in an environmentally sensitive waterway containing red mangroves. The vessel owner failed to initiate cleanup actions and Federal Project Number M14016 was opened. The vessel discharged an estimated 250 gallons of diesel and motor oil into the navigable waterway. Puerto Rico police used their harbor patrol boat to assist contracted personnel with the deployment of oil containment boom. Clean Harbors was contracted by the Coast Guard to remove all oil and hazmat products onboard the vessel and in the navigable waterway. Operations were completed on April 28, 2014. The contractors successfully dewatered and refloated the vessel. The total cost of the project was \$44,971.66.

M/V MARIMAR II; Salinas, PR

On October 22, 2014, Sector San Juan received a report of a submerged vessel discharging gasoline into the navigable waterway at Marina De Salinas, Salinas, Puerto Rico. U. S. Coast Guard Resident Inspection Office Ponce and Sector San Juan dispatched pollution responders to conduct a preliminary investigation and discovered the M/V MARIMAR II, a 33 foot fiberglass fishing vessel,

starboard side to bottom. Salinas harbor is bordered by red mangroves and home to endangered manatees. Coast Guard pollution responders were unable to contact the owner of the vessel and Federal Project Number M15001 was opened due to the threat of pollution from the vessel's fuel tanks. Clean Harbors was contracted to deploy containment boom around the vessel and remove the remaining fuel from the two onboard fuel tanks. Coast Guard personnel eventually contacted the responsible party who stated he was incapable of meeting the financial obligation to remove the pollution threat from the navigable waterway. Clean Harbors removed the remaining fuel and cleared the waterway of any remaining oily sheen. Operations were completed on November 10, 2014. The contractors successfully dewatered and refloated the vessel to prevent further discharges. The total cost of the project was \$57,955.80.

B. CRRT Meetings - Agendas and presentations from the meetings identified below are posted on the CRRT website.

- July 8-10; St. Thomas, USVI
- November 18-20, 2014; Rio Piedras, Puerto Rico.

C. Committee and Working Group Updates

CRRT Chemical Facility Safety and Security Committee

On July 8, 2014, we conducted the first briefing on the President's Executive Order 13650 on Chemical Facility Safety and Security during the CRRT Meeting on St. Thomas, USVI. We reviewed the Region 2 pilot's efforts, determined that the work in the Caribbean would be conducted through a committee on the CRRT, and would leverage as much as possible the work accomplished by the Region 2 Pilot. We also identified potential committee members to support the work. The timeline to complete the work and begin implementation is September 2015.

On November 18th, the first meeting of the CRRT Chemical Facility Safety and Security Committee was held in Rio Piedras, PR, in conjunction with the CRRT meeting. We discussed the work and reporting structure for the committee's efforts. The EO work will occur within a committee under the CRRT, with a reporting requirement to the NRT and the Chemical Facility Safety and Security National Working Group. The CRRT Committee will include representatives from CRRT member agencies, as well as participants from outside the existing CRRT organization.

We established the Chemical Facility Safety and Security Regional Working Group that will be responsible for establishing and implementing a structure for regular briefings and feedback from all stakeholders regarding the actions identified in the report. The Chemical Facility Safety and Security Regional Working Group consists of the three co-chairs for the EO regional work, which are DHS, OSHA, and EPA.

The CRRT Executive Order project will enhance coordination regarding chemical facility safety and security, and will seek to do the following:

- Develop and deploy best practices;
- Innovate and test new methods for interagency collaboration;
- Integrate (regional) federal and state assets where appropriate;
- Develop integrated Standard Operating Procedures;
- Develop innovative approaches to collecting, storing and using facility information; and
- Include stakeholder engagement, inspection planning, and coordinated inspections of facilities.

Within the CRRT EO Committee, we are creating two work groups across the three disciplines of prevention, preparedness/planning, and response.

- Work Group #1 will focus on the following issues:
 - First Responder Community;
 - State Emergency Response Commissions (SERC) and Local Emergency Planning Committees (LEPC); and
 - Tier 2 Information – Chemical Inventory
- Work Group #2 will focus on the following issues:
 - High Risk Facilities/Chemical of Interest – Risk Management; and
 - Data and Information Sharing

The CRRT EO Committee will commence their work by taking eleven of the sixteen Standard Operating Procedures (SOP) developed by the Pilot and adjusting them for use within the Caribbean Region. The SOPs may be adopted in whole, or changes may be necessary to sustain and implement the resource-neutral work within the region. There is a potential that additional SOPs may be created that are specific to this region. The following are the list of SOPs that will be addressed.

- **Administration, Assessment, and Training**
 - Regional Response Team (CRRT) – Change in Participation
 - Sustainability
 - Evaluation of Work Products

- **Sharing Federal, State, Tribal, and Local Program Descriptions**
 - Improving Coordination with Federal and State Agencies on Programs, Roles, and Contacts – Getting to Know You

- **Increasing Inspector/Responder Access to High Risk Facility Information - Information/Data Sharing**
 - Inter-Agency Inspection Information, Data Requests, and Database Access
 - Revised Inspection Protocol – EPCRA 311, 312 Inspections and Development of Ways to Make EPCRA 302 Information More Available to First Responders and Fire Fighters

- **Coordinating Facility Inspections**
 - Coordinated Inspections
 - Inspection Referrals

- **Identifying Facility and Subject Matter Experts for Planners/Responders**
 - Simple Guide to provide First Responders with Access to “Subject Matter Experts” – Single Point of Contact for Facility Chemical Information

- **Local Emergency Planning Committee (LEPC) Support**
 - Joint Drills and Exercises
 - LEPC Best Practice Implementation and Support

As the Region 2 RRT in New York and New Jersey continues the implementation of their SOPs, the CRRT is looking to use the results of the following SOPs to enhance our efforts:

- Incident Commander and Hazardous Materials Supervisor Training for Senior Fire Department Personnel
- Approach for Specific HAZWOPER Training Standard for Hazmat Responders
- Outreach to Regulated Industry Concerning the “Emergency Contact” Listed on the Annual Tier II Form and Prompt Reporting of New Chemicals
- Enforcement Initiative to Identify EPCRA 311, 312 Violations and Ensure Continued Compliance with the Regulations

II. GENERAL PREPAREDNESS AND CONTINGENCY PLANNING

A. Training:

Sector San Juan conducted a VOSS, Equipment Deployment, as well as ICS-300 and ICS-339 training during the period of this report. In addition, the Sector had a visit from USCG IMAT to assist in ICS training and qualifications.

B. Exercises and Workshops:

On 3-4 Sept, Sector San Juan and MSD St. Thomas exercised the OPA 90 equipment trailer and response boom in St. Thomas, to maintain a capable and effective preparedness posture for pollution response. This also provided training to Sector San Juan/ MSD St. Thomas response personnel involved in deploying the boom. Training was conducted with local contractors, which will provide a more proactive versus reactive response for future responses.

C. Federal, State, and Local Planning and Coordination Issues Efforts

- In February 2014, several CRRT members participated in a consultation summit in St. Petersburg, FL. The purpose of the meeting was to discuss consultation requirements under the Endangered Species Act and Essential Fish Habitat regulations, as well as the National Historic Preservation Act. In addition, the meeting sought to establish a path forward in the development of appropriate biological assessments and to update, where required, past consultations conducted within the CRRT AOR.
- Sector San Juan is working with FEMA on the development of Search and Rescue plans for response to a catastrophic Tsunami and/or Earthquake in the Virgin Islands and Puerto Rico. In addition, the Sector and EPA are assisting FEMA in developing a Catastrophic Debris Removal Plan for PR and USVI.
- Sector San Juan's VOSS equipment and three OPA 90 trailers, stored in the Puerto Rico National Guard's Hangar 21, were found to be contaminated with lead. The Hangar 21 ceiling had lead paint that flaked off and fell on 100% of the USCG response equipment. D7 DRAT is working with a contractor to clean the equipment, which is anticipated to be out of service until April/May 2015.
- Sector San Juan conducted Area Committee meetings on Mar 22nd and August 21st.

D. Major Best Practices from Responses, Trainings, Exercises/Workshops and other RRT Activities:


- NSTR

III. PERSONNEL CHANGES/ORGANIZATIONAL CHANGES


LCDR D. Cruz (Contingency Planning & Force Readiness) will depart Sector San Juan in June 2015. His replacement will report in June/July 2015. In addition, with the departure of Mr. Wade Gough, the Sector is currently without an ACP Planner.

IV. ISSUES OR OPERATIONAL REQUIREMENTS REQUIRING NRT ATTENTION

- Funding for Federal and Commonwealth/Territorial agencies for travel to attend CRRT meetings, workshops and training continues to be problematic.



Forest A Willis, USCG (Date) 12/18/15
U.S. Coast Guard Co-Chair
Seventh Coast Guard District



Eric Mosher (Date) 12/18/15
EPA Co-Chair
US EPA, Region 2