

USCG Sector Delaware Bay & Sector Maryland–NCR Joint Offshore Lightering Workshop / Discussion Tabletop

Summary Report to Region III Regional Response
Team

September 6, 2018

The After-Action Report/Improvement Plan (AAR/IP) aligns exercise objectives with preparedness doctrine to include the National Preparedness Goal and related frameworks and guidance. Exercise information required for preparedness reporting and trend analysis is included; users are encouraged to add additional sections as needed to support their own organizational needs.

EXERCISE OVERVIEW

Exercise Name	Joint Sector Delaware Bay & Sector Maryland-National Capitol Region (NCR) Offshore Lightering Exercise
Exercise Date	September 6, 2018
Scope	This exercise is a Workshop / Discussion Tabletop Exercise (TTX) that was conducted at Delaware State Fire School facility, 1463 Chestnut Grove Road, Dover Delaware, 19904. The participants included members from the U.S. Environmental Protection Agency (USEPA) Region II and USEPA III Regional Response Teams, U.S. Coast Guard (USCG) District 5, five USCG Sectors (Delaware Bay, Maryland-NCR, Hampton Roads, New York, and Long Island Sound), government and state officials from Delaware, Maryland, Virginia, and New Jersey, federal and state trustee agencies, Non-governmental agencies, Oil Spill Removal Organizations / Co-ops, and other contractors.
Mission Area(s)	Planning
Exercise Objectives	<ol style="list-style-type: none">1. For a major offshore spill with trans-boundary implications, identify and discuss the establishment of effective and timely response organization(s), to effectively manage command, control, communication, and coordination for a complex and prolonged response.2. Identify and discuss the mobilization of critical resources for responding in the offshore and coastal environments.3. Determine if the provisions of the applicable Area Contingency Plan(s) (ACPs) and 1997 RRT III Memorandum of Understanding (MOU) can be understood and executed for the use of chemical countermeasures within the window of opportunity.4. If chemical countermeasures are used, discuss procedures and requirements for operational application, monitoring for effectiveness, and responder/public health and safety.5. Discuss the recommended course(s) of action for the first 0-48 hours following a major offshore spill, including the timing and logistical implementation of response countermeasures' supply chain, delivery, and observation (as applicable).6. For a major trans-boundary offshore spill in which shoreline impact is anticipated, assess adequacy of current plans and procedures for response and protection strategies, and support requirements, for the coastal DELMARVA area for a prolonged response (2+ days).

Threat or Hazard	Petroleum product; crude oil release (Palanca crude oil was used as a representative cargo)
Scenario	<p>On September 6th, at 0400 local time, two vessels were conducting lightering operations approximately 30nm due east of Cape Henlopen, DE. Both vessels were owned and operated by AET (formerly dba American Eagle Tankers). A catastrophic accident occurred (investigation ongoing) during the lightering event, which resulted in approximately 1 million gallons of Palanca medium crude oil being spill into the Atlantic Ocean. At the time of the spill the prevailing weather conditions were: 15knot winds out of the northeast. Seas: 3-6ft waves.</p> <p>NOTE: The cause of the incident was not the focus of the exercise, so no discussion was held to address the casualty event.</p>
Sponsor	EPA Region III and USCG D5, Sector Delaware Bay and Sector Maryland-NCR; AET Tanker Holdings
Participating Organizations	<p>United States Environmental Protection Agency, Region III United States Environmental Protection Agency, Region II United States Coast Guard, District 5 United States Coast Guard, Sector Delaware Bay United States Coast Guard, Sector Maryland-NCR United States Coast Guard, Sector Hampton Roads United States Coast Guard, Sector New York United States Coast Guard, Sector Long Island United States Coast Guard, Headquarters-MER United States Coast Guard, Atlantic Strike Team (AST) United States Coast Guard, National Pollution Funds Center (NPFC) United States Department of the Interior (DOI) United States Fish and Wildlife Service (USFWS) United States Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) United States National Park Service – Assateague Island National Seashore Delaware Emergency Management Agency (DEMA) Delaware Department of Natural Resources and Environmental Control (DE DNREC) Maryland Department of the Environment (MDE) Maryland State Historic Preservation Office New Jersey Department of Environmental Protection (NJ DEP)</p>



Virginia Department of Environmental Quality (VDEQ)
The Nature Conservancy (TNC)
Tri-State Bird Rescue and Research
AET
HalenHardy
Monroe-Energy
Philadelphia Energy Solutions (PES)
Gallagher Marine Management Services (Qualified Individual [QI] for the Responsible Party [RP])
Marine Spill Response Corporation (MSRC)
Delaware Bay & River Cooperative (DBRC)
Research Planning, Inc. (RPI)
Scientific & Environmental Associates, Inc. (SEA)



**Points of
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EXECUTIVE SUMMARY

The USCG Sector Delaware Bay identified a significant response issue in 2016 when it was determined that the frequency of lightering operations offshore, and the volume of oil lightered in each operation, were steadily increasing. The Area Committees (AC) and Regional Response Team (RRT) began discussing the potential implications of a “**low probability, high consequence discharge**” at the offshore lightering area.

The offshore area used for lightering is generally 20-40 nautical miles east of Delaware, and is not a federally designated anchorage or lightering area; there is a general area 20 to 40 miles offshore that is being used by tanker vessels. As of October 2018 data, the amount of total petroleum product by volume lightered in the Sector area of responsibility increased 19% from 2016 to 2018. The offshore area accounts for roughly 23% of total lightering volume in the Sector’s area of responsibility, and trending upward over the last two years. Per-event lightering load has also increased 27% since 2016. On average, approximately five offshore lightering events occur monthly, accounting for approximately 4 million barrels of crude oil lightered per month.

Taking the long view, the Region III Regional Response Team (RRT III), in coordination with the USCG Sector Delaware Bay began developing a series of outreach and exercises that would progressively build upon and culminate in a workshop / discussion tabletop exercise (TTX). The objective was to garner the experiences of the RRT III membership, area committee participants, and emergency responders for addressing a potential spill incident taking place in the offshore waters (20+ miles from shore) of in Region III. A significant discharge in the Sector Delaware Bay offshore waters could result in a multi-region, multi-sector, multi-state response where pre-authorization decisions (dispersants and in-situ burning) would come into play.

Pre-training Efforts

This series of exercises, drills, and training increased in frequency and focus over a 10-month period culminating in the Joint Sector Area Exercise held on September 6, 2018. The intent was to inform and prepare the response community in Region III for such a significant and impactful event. The outreach and training series included:

- **November 7, 2017** - RRT III Notification Exercise
- **April 9-13, 2018** - NOAA Science of Oil Spills (SOS) training using this offshore lightering scenario
- **April 24, 2018** - RRT III Dispersant Activation Exercise to identify the state decision-making authority for dispersant use and natural resource trustees using the offshore lightering scenario
- **May 14-17, 2018** – Exxon/Mobil Dispersant Oil Spill Response Strategies and Tactics Training workshop at the OHMSETT facility
- **May 22, 2018** - RRT III Dispersant Workshop and Round-table Discussion on the use of dispersants using the offshore lightering scenario

- **May 23, 2018** - RRT III Spill Response Countermeasures Workgroup evaluation and update of the 1997 Region III Chemical Countermeasures Preauthorization Memorandum of Understanding (MOU) (*underway*)
- **June 28, 2018** – Commander of Sector Delaware Bay presents on offshore lightering and planning/exercise efforts at the NRT/RRT Co-Chairs Meeting in Philadelphia.
- **August 6-10, 2018** – OHMSETT Dispersant Workshop
- **August 8-28, 2018** - Development of the RRT III 1997 MOU for Chemical Countermeasures, Annex II – Critical Decision Making Data form
- Sectors Delaware Bay & Maryland-NCR Area Committee training efforts
- **August 29, 2018** – Volunteer Responsible Party (AET) conducted the National Response Center (NRC) Notification Drill in advance of the offshore lightering scenario
- **September 6, 2018** - Joint Sectors Delaware Bay / Maryland – NCR Offshore Lightering TTX

Exercise Objectives

The purpose of the Exercise was to examine six mission areas of mitigation and response along with their core capabilities. The exercise objectives were:

1. For a major offshore spill with trans-boundary implications, identify and discuss the establishment of effective and timely response organizations), to effectively manage command, control, communication, and coordination for a complex and prolonged response.
2. Identify and discuss the mobilization of critical resources for responding in the offshore and coastal environments.
3. Determine if the provisions of the applicable ACP(s) and 1997 RRT III MOU can be understood and executed for the use of chemical countermeasures within the window of opportunity.
4. If chemical countermeasures are used, discuss procedures and requirements for operational application, monitoring for effectiveness, and responder/public health and safety
5. Discuss the recommended course(s) of action for the first 0-48 hours following a major offshore spill, including the timing and logistical implementation of response countermeasures' supply chain, delivery, and observation (as applicable).
6. For a major trans-boundary offshore spill in which shoreline impact is anticipated, assess adequacy of current plans and procedures for response and protection strategies, and support requirements, for the coastal DELMARVA area for a prolonged

Exercise Conduct

The TTX was comprised of introductory and education slides for the exercise scenario and three distinct modules for focused participant discussion:

- Introductory briefs were presented on lightering, the scenario, resources at risk, and response toolbox options
- MODULE 1 Discussion: Incident Command/Unified Command/Response Organization
- Brief on Dispersants Status Update
- MODULE 2 Discussion: Offshore/Nearshore Response

- **MODULE 3 Discussion: Onshore Response**

The Exercise Facilitator had a key list of questions that were solicited from the participants in advance to prompt active discussion of the exercise modules (Table 1); not all questions and topics were addressed. The goal of this exercise was to address the stated objectives and identify / solidify decision making related to the various modules. Ultimately, the regional and area planning documents will be updated to reflect the decisions made during the workshop as well as addressing identified gaps and planning / research needs.

The Exercise was very well received by all participants and the decision making / discussions are detailed in the Sector After Action Reports. At the conclusion of the exercise, all participants were led through an exercise hotwash; an "after-action" discussion and evaluation of the participating agencies' performance immediately following the exercise event. The hotwash session is used to identify strengths and weaknesses of the exercise decision making, as well as determine lessons learned and planning needs to guide future response direction. These after action items are incorporated into Table 2.

Key Findings

- Based on the NOAA trajectory performed for this scenario, oil would impact the shoreline in 96 hours, regardless of the efficacy of the offshore response effort. To reduce overall shoreline impact, the effectiveness of the offshore response could be increased by employing remote sensing technology to vector mechanical recovery resources to locations of best effect, and use of alternative response strategies such as chemical countermeasures and in-situ burning.
- It should be expected that the Responsible Party (AET in this case) will immediately begin mobilization of dispersants and planes to a staging area, in conjunction with their QI and OSRO(s), while the decision making process for use of dispersants is ongoing. For this type of scenario, it should also be expected that the Responsible Party will pursue authorization from the FOSC to use dispersants, per the applicable pre-authorization RRT MOU(s).
- One primary Unified Command where decisions are being made is preferred. However, multiple Incident Command Posts in the affected states is anticipated. An Area Command may become necessary to broker critical resources, establish regional priorities, assist with inter-state challenges, etc.
- This scenario meets several criteria for a Spill of National Significance (SONS), but would likely not involve the level of complexity to require a National Incident Commander. However, a SONS designation can't be ruled out. Authorization to use chemical dispersants in Zone 2 (state waters) is not likely, and the anticipated timeline needed to achieve authorization within a state defers widely, depending on the state. Education and outreach efforts between the RRTs and states on this issue should continue to help manage expectations, and maximize efficiency of incident specific consultation and approval processes.

Table 1 List of Facilitator Questions by Module

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
Module 1 Discussion Topics - Incident Command / Unified Command / Response Organization		
FEDERAL ON SCENE COORDINATOR (FOSC):	1. Who is the FOSC and how will that evolve over time for the scenario that will impact three USCG FOSC AORs + potentially two USEPA Regions?	
NOTIFICATION:	1. Have States (MD, VA, and NJ) been notified? By whom? 2. AET: Assuming you notify the NRC, does that satisfy the NRC?	a. Does Sector Delaware Bay (SDB) have a trigger or policy for notifying other Sectors and state agencies if a spill happens? What is the criteria (spilled amount, impact to state, proximity to state waters)? b. If not, how are they added to the notification list? c. Does SDB Oil spill Annex to the ACP adequately address cross Sector Responses (unified commands [UCs])? d. Do the other ACPs address this topic? e. Who will ensure that they are included in future discussions? f. What about USEPA Region II? Have they been notified?
RESPONSE ORGANIZATION: Assuming trajectory is known	1. What does the response organization look like? 2. Who is part of the UC for this event? 3. Is there going to be an Area Command? What will trigger this organizational elevation for response? 4. What determines if an incident is classified as a Spill of National Significance (SONS)? Who makes that call to classify it as a SONS?	a. Would NJ be part of the UC? When? If not, would they send a Liaison to the UC? b. Would Sector NY stand up an Incident Command Post (ICP) for this scenario (oil goes to DE, MD, and VA)? c. What are the benefits of an Area Command? d. What are the benefits of separate ICPs at each Sector? e. What jurisdictional authority do the Captains of the Port (COTPs) of the other Sectors have? f. Are they FOSCs, FOSC-Representatives, or other? g. Does the ACP address this issue? h. Does Area Command chapter in Incident Management Handbook provide enough guidance for Sector Commanders and District Commander?

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
		<ul style="list-style-type: none"> i. How will information flow between ICPs? How do the concerns of VA or NJ get to the ICPs in MD and DE?
OTHER:		<ul style="list-style-type: none"> a. SDB Area Committee (AC) has determined that all spilled amounts will be reported in gallons; does this conflict with other sector policies? b. Will this event allow lightering in Delaware Bay (Big Stone) to continue? c. Public Interactions – Community meetings, website, social media, trusted representatives, risk communication /outreach and education, etc. d. Media Needs – Joint Information Committee (JIC), where is it located? Who speaks for the response? e. Government Agency Information Needs – how to feed the “beast” (Cabinet Secretaries, National Response Team (NRT), Interagency Solutions Group (IASG), etc. f. Claims
PLANS, POLICIES & PROCEDURES NEEDS	<ul style="list-style-type: none"> 1. Based on our discussions, are there any plans, policies, procedures, and tools to be developed / updated for the ACP or for your agency to adequately address these issues? 	
Module 2 Discussion Topics – Offshore / Nearshore Response		
OFFSHORE Containment and Recovery:	<ul style="list-style-type: none"> 1. What RP response assets can operate at the offshore lightering location (> 3 nm to 200 nm)? 2. What are the estimated times of arrival (ETAs) for the RPs response assets to respond and be operational on scene (30 nm)? 3. What other assets are available to call up? What would be their ETA? 4. Other Sources? 5. Would COTP SDB consider reducing the requirements for Oil Spill Response Organization (OSRO) coverage in the Delaware Bay and River? 	<p>Equipment:</p> <ul style="list-style-type: none"> a. Navy Supervisor of Salvage (SUPSALV) equipment from Cheatham Annex – 2015 Memorandum of Agreement (MOA)? b. What are their limitations of operation – wave height? swell? Other? c. Offloading / fueling logistics for large response vessels? d. Best Management Practices (BMPs) for all response Strategies in Offshore e. Endangered Species Act (ESA) Consultation required for all response operations <p>DBRC Logistics:</p>

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
		<ul style="list-style-type: none"> a. What role would DBRC play in the offshore environment since it provides Average Most Probable Discharge (AMPD) coverage for its members? If DBRC has coverage for AMPD, the RP will definitely require them to respond? How do we address? b. If Indian River is expected to be impacted, would USCG allow DBRC to deploy the USCG-owned boom vanes? c. Can DBRC expect the UC to request DBRC's 100,000 ft. of boom to be deployed to DELMARVA? How much should be left to cover the sensitive areas up-river?
NEARSHORE Containment and Recovery:	<ul style="list-style-type: none"> 1. How many local / regional response assets can operate in 0.5 to 3 nm from shore? ETA Timeline? 2. What other assets are available to call up via OSROs? What would be their ETA? 3. Other Sources? SUPSALV? USCG? 	<ul style="list-style-type: none"> a. BMPs for all Response Strategies in Nearshore b. ESA Consultation for all Response Strategies c. Offloading /fueling logistics for vessels operating in this area?
IN-SITU BURNING:	<ul style="list-style-type: none"> 1. Where would <i>In Situ Burning</i> (ISB) be considered for use under this scenario? 2. Is there fire boom in the area/region? Where is it located? How much? Can the RP use it? Where are additional stockpiles of fire boom? How long will it take to get here? 3. Would state air permits be required for ISB burn operations offshore? 	<ul style="list-style-type: none"> a. What are the limitations for ISB Use? Swell? Wave height? b. Where would tow boats for ISB be coming from? Are they operational in offshore waters? c. What training is required for Operational ISB? d. How long will ISB be effective? e. What are the sampling requirements for documentation, litigation, Natural Resource Damage Assessment (NRDA), etc. f. What are the BMPs for ISB use g. ESA Consultation is required for all response operations
DISPERSANTS:	<ul style="list-style-type: none"> 1. Offshore application (Zone 1) of MOU is pre-authorized in 1997 MOU. 2. Would dispersants be considered for use under this scenario? Where would they be used? 3. What would trigger dispersant conversation? Volume spilled? Weather and Wave height? Trajectory? 4. Would FOSC be willing to utilize the pre-authorization in the MOU for dispersant use? 	<p>Dispersant MOU Concerns:</p> <ul style="list-style-type: none"> a. What is the FOSCs approach or interpretation of the MOU for dispersant use and applied? – e.g., which states are threatened, and what consultations are underway; RP responsibilities; administrative needs; etc. b. Would a test for dispersant applications effectiveness be required for Zone 1? Who will do it? Who will document the results? c. Would Tier 1 Monitoring be appropriate for applications?

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
	<ul style="list-style-type: none"> 5. Who decides to allow operational application of dispersants? How long does it take to get that decision? 6. Is the current RRT3 MOU (1997) is executable as written within the required timeframe for effective dispersant application 7. How would operational use of dispersants transition from Zone 1 to Zone 2 applications? 8. What would be required based on 1997 MOU? 	<ul style="list-style-type: none"> d. When would the Incident-specific RRT be notified of the dispersant application? Would COTP require USEPA concurrence before application? Operational Use? e. Use in State Waters - If dispersants are being considered off DE, does MD and/or VA want (or have "a right") to be consulted? f. In Federal Waters (Zone 1) what distance from shore would the states want to be consulted if dispersants are going to be used? <p>Logistics of Dispersants:</p> <ul style="list-style-type: none"> a. How would the Dispersant operations (NRC & MSRC) be triggered? By RP? FOOSC? Both? b. What information will the States need to know at the time of the spill? c. How would dispersant OSROs be accessed? RP? USCG Basic Ordering Agreement (BOA)? Other? d. When would Dispersant response assets arrive on scene and be operationally ready? e. DBRC has a boat mounted spray system that can be deployed on the Delaware Bay Launch boats – would they be used? f. Are there differing environmental response, and health and safety, considerations or concerns between aerial and boat mounted systems? g. What resources are likely to be affected by dispersant application? How will you know if marine mammals and sea turtles are in the area? h. What set back limits would be placed for ESA species? i. Would a consultation be required for protected (ESA, Marine Mammal Protection Act [MMPA]) species? j. Where are the 40 foot water depths lines – do we have the information accurately mapped and available? k. What are the sampling requirements for documentation, litigation, NRDA, etc.? l. What are the BMPs for Dispersant use?

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
		m. ESA Consultation is required for all response operations
MONITORING:	<ol style="list-style-type: none"> 1. 1997 MOU requires monitoring for Dispersants and ISB operational use – Tier 1 as a minimum. 2. Who is doing SMART monitoring for ISB? For Dispersants? 3. Is Atlantic Strike Team (AST) SMART monitoring capability operational and ready? ETA? 4. Can we use USEPA instead for air monitoring for ISB if necessary? 	<ol style="list-style-type: none"> a. Are support aircraft available? b. What are the training needs / equipment for conducting SMART? Tier 1, Tier 2, Tier 3? c. When would Tier 2 and Tier 3 be operationally available? d. What resources / logistics are needed for the duration of the operation? e. Data evaluation, normalization, and coordination
OTHER ISSUES:	<ol style="list-style-type: none"> 1. Are the current provisions of the ACP adequate for dispersant use? 2. How do we determine / consider trade-offs for Resources at Risk (RAR)? 3. What are the issues associated with commercial and recreational fisheries, recreational boating, etc. for decision-making? 	<ol style="list-style-type: none"> a. Will the commercial and recreational fishing grounds be closed? b. Will seafood safety be addressed?
PLANS, POLICIES & PROCEDURES NEEDS	<ol style="list-style-type: none"> 1. Based on our discussions, are there any plans, policies, procedures, and tools to be developed / updated for the ACP or for your agency to adequately address these issues? 	
Module 3 Discussion Topics – Onshore Response		
ONSHORE RESPONSE:	<ol style="list-style-type: none"> 1. What do the various agencies see as their largest obstacles for onshore response? 2. Access Issues (this is a big issue for most of the area in MD and VA) 3. Do you plan to use local knowledge for access/guidance? What do you propose for access? 4. Protection of RAR on shore - economic, socioeconomic, and cultural issues (ESI issues); 5. Access to Tri-state? National Parks Service (NPS) response personnel for cultural needs; tribes with interest in the area? Coordination with them (not likely to be an issue for this scenario), etc. 	<ol style="list-style-type: none"> a. Logistics - SCAT, Rapid assessment teams, accommodations/housing, field surveys, wildlife recovery and rehab, etc. b. Containment, recovery, and protection strategies? Priorities with limited resources? Do we use local boats for response? c. Subpart J options for onshore response – surface washing agents (SWAs), solidifiers, Elasticity modifiers, bioremediation agents, etc. d. ESA Consultation is required for all response operations e. What are the BMPs for all response strategies f. Does the plan adequately address the Use of Volunteers?

Agenda Focus:	Primary Discussion Item(s):	Additional Questions/Parking Lot:
PLANS, POLICIES & PROCEDURES NEEDS	1. Are the current provisions of the ACP adequate for these issues?	

Recommendations

The TTX Participants provided recommendations to expand upon the exercise and to formalize the lessons learned (Table 2). These recommendations included (beginning on page 15):

Table 2 List of Recommendations and After Action issues identified during the September 6, 2018 discussion exercise

Recommendation	Responsibility for Action					
	RRT III*	USCG				Other States / Agencies
		SDB	SMD-NCR	SHR	SNY	
Planning Document Updates:						
1. Address lessons learned in Area Contingency Plan (ACP) planning documents and the Regional Contingency Plan (RCP), where appropriate	X	X	X	X	X	RRT II
2. Update Dispersant MOU; incorporate Dispersant MOU update into planning documents; RRT collaboration with Sectors	X	X	X	X	X	RRT II
3. Resolve whether NJ is a signatory to the 1996 amendment to the 1994 RRT II MOU for pre-authorized use of chemical countermeasures. Determine if a gap in pre-authorization exists in the area off NJ between the D1/D5 border, and the RRT II/III border	X					RRT II
4. The Critical Decision Making Data form (derived from the RRT III MOU Annex II) should be reviewed to clarify responsibilities and to improve sequence/progression of data input	X	X	X	X		
5. Recommend establishing a small workgroup to address the lessons learned from this workshop discussion and the exercises components leading up to the TTX	X					
6. Update ACPs to include language and a generic organization response template for offshore responses. Address the make-up of the UC including initial FOOSC and potential transfer of FOOSC responsibilities		X	X	X		
7. Define “triggers” for how / when to involve other sectors / states outside of the initial responding Sector AOR		X	X	X		
8. Ensure plan accurately defines how response authority may change throughout an incident—change of Federal On Scene Coordinator (FOOSC), Area Command; Spill of National Significance (SONS) declaration	X	X	X	X		
9. Formalize how the Captain of the Port (COTP) would release equipment for AMPD coverage in the port to respond offshore; develop language in the ACP that states that the COTP (FOOSC) may consider modifying AMPD		X	X	X		OSROs

Recommendation	Responsibility for Action					
	RRT III*	USCG				Other States / Agencies
		SDB	SMD-NCR	SHR	SNY	
coverage requirements so locally available equipment may respond to the incident						
10. Address an offshore lightering incident into their plans (section 9400); need to reflect awareness of planning process when a spill initiates outside of their area of responsibility (AOR); how to address communication between sectors when incident expands beyond one AOR		X	X	X		
11. Consolidate/analyze data provided by QI/OSROs to determine most reasonable force laydown and best case encounter rate/effectiveness by response strategy relative to projected spill coverage for first 96 hours as a pre-planning tool		X	X	X		USEPA Subareas
12. Continue evaluation of OSRO response capabilities for inshore / nearshore coastal response within Area Committees		X	X	X		
13. Develop boilerplate Decontamination Plans for offshore responses		X	X	X		
14. Develop boilerplate Shoreline Pre-impact (Debris Removal) Cleanup Plans		X	X	X		
15. Revisit geographic response strategies (GRS) / protection booming strategies in ACPs for coastal zone beyond inlet protection		X	X	X	X	
16. When 40CFR300.900 (Subpart J) is updated, will need to address the changes within the planning documents and MOUs	X	X	X	X	X	RRT II
17. Develop and update Volunteer Management planning documents	X	X	X	X		
18. Review and update Media / Public Outreach planning documents		X	X	X		
19. Develop Plan of Action document to address the Native American Graves Protection & Repatriation Act (NAGPRA); incorporate into planning documents		X	X	X		
20. Develop tools and guidance to better address responder health and safety in planning documents	X	X	X	X	X	States
21. Review and update Decanting Guidance documents; incorporate into planning documents	X	X	X	X		

Recommendation	Responsibility for Action					
	RRT III*	USCG				Other States / Agencies
		SDB	SMD-NCR	SHR	SNY	
Future Exercise and Training Needs:						
1. Focus future exercise on a single segment of the response; countermeasures, offshore response, onshore response, etc. to get at the “meat” of the issues and resolve some issues		X	X	X		
2. Conduct a similar, exercise, drill and training scenario for an inland zone	X					USEPA
3. Resources at risk discussion not detailed enough during TTX—migratory bird flyway issues and Threatened and Endangered (T/E) species presence not fully addressed	X	X	X	X	X	USFWS
4. Training continuation to address items not covered during TTX:						
a. Continue to conduct multi-state / region exercises and across sector training	X	X	X	X	X	RRT II
b. All-hands discussion of the lessons learned topics to further flesh out and resolve issues for incorporation into planning documents	X	X	X	X	X	
c. Exercise the dispersant notification process for an offshore spill including draft Annex II forms of the 1997 MOU, Section 7 consultations, and RRT coordination	X	X	X	X	X	
d. Follow-up with functional exercise for the unified command using this scenario		X	X	X	X	
e. Host a real-time decision-making exercise in the near future for dispersants and ISB consideration and application	X	X	X	X	X	RRT II
f. Additional discussions on impacts from an offshore incident on east coast vessel traffic		X	X	X	X	
g. Identify research needs to be provided to the states prior to an incident to help decision makers more rapidly evaluate the use of dispersant and ISB; states need to be more proactive and decision makers educated on a regular cycle	X					RRT II States

Recommendation	Responsibility for Action					
	RRT III*	USCG				Other States / Agencies
		SDB	SMD-NCR	SHR	SNY	
h. Identify potential impacts to critical infrastructure and commerce – nuclear facilities, facilities, LNG shipping, lightering at Big Stone anchorage		X	X			
i. Exercise the coordinated deconfliction of air space for this response		X	X	X		
j. Address the use of new technologies (e.g., drones) to be incorporated into the planning documents; Applied Response Tool Evaluation System (ARTES) should be addressed and more fully tested by ACs	X	X	X	X		
5. Conduct future dispersant decision-making exercise to identify additional information needs for application in offshore waters; what volume, potential impact, etc. would be required; formalize trade-offs discussion	X	X	X	X	X	X
Future Outreach and Education Needs:						
1. Need to develop briefing package for states on chemical countermeasures, the dispersant and in-situ burn (ISB) MOUs, etc. Need to have education package ready and present for administration turnovers or as needed	X					Coordination with States
2. States need to be engaged to push their resource trustees on the issues of notifications for dispersant use in Zone 1, and decision-making in State Waters (Zone 2)	X					Coordination with States
a. States should pre-identify state resources at risk and determine what information they need to make decisions						
3. Public Affairs and Media Relations:						
a. Have media relations present in future (or separate exercise) to coordinate and discuss public messaging / public relations	X	X	X	X		
b. Develop additional education and outreach materials for public dissemination relating to spill response, dispersant and ISB use, monitoring, etc.	X					
c. Ensure that public affairs personnel are equipped with talking points, educational materials, etc. prior to a response	X	X	X	X		

Recommendation	Responsibility for Action					
	RRT III*	USCG				Other States / Agencies
		SDB	SMD-NCR	SHR	SNY	
d. Public outreach and education for dispersant and ISB needs to be addressed often and regularly	X	X	X	X	X	RRT II
Other Items:						
1. Address boom vane and other equipment needs for Indian River inlet protection strategy		X				
2. Still need to clarify: What is the understanding of states and involved agencies including RRTs and Incident-specific RRTs regarding “consultation and/or concurrence?”						
<p>*State and other agency involvement in addressing each recommendation is assumed to be a component of the RRT III Responsibility of Action unless specifically stated in the “Other Agencies” category.</p> <p>SDB = Sector Delaware Bay SMD-NCR = Sector Maryland-National Capital Region SHR = Sector Hampton Roads SNY = Sector New York</p>						