



NATIONAL TRANSPORTATION SAFETY BOARD - **Public Hearing**

Conrail Derailment in Paulsboro, NJ with Vinyl Chloride Release

GROUP	3
EXHIBIT	
BY	

Agency / Organization

U.S. Coast Guard

Title

US Coast Guard After Action Report
30 Nov 2012 – 17 Dec 2012

Paulsboro Train Derailment (FOUO)

After Action Report

30 Nov 2012 – 17 Dec 2012



	Exercise / Event Information
COE #	N/A
Event Name	Paulsboro Train Derailment (FOUO)
Event Type	Actual
Submitting Organization	SECTOR DELAWARE BAY
OPFAC	05-37050
Type of Mission	Marine Environmental Protection
Level of Effort	Participate
Type of Exercise	

	Estimated Event Cost	Actual Event Cost
AFC-30:		

	Point of Contact
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Attachments:

SDB-Hotwash-EastJeffersonStreetBridgeTrainDerailment2012-V2.xlsx
QUICK LOOK PAULSBORO TRAIN DERAILMENT.doc

General Description:

At approximately 0700 on the morning of 30 Nov 2012 as an 84 rail car train with two locomotives on its way from Camden, New Jersey to Logan Township, New Jersey crossed over Mantua Creek on a bridge known locally as the East Jefferson Street Bridge (actual name of the bridge is the "Conrail Railroad Bridge") in Paulsboro, New Jersey, a derailment occurred and forced seven (7) rail cars to leave the tracks with four travelling down into the waterway. Four of the seven derailed cars contained the chemical compound, vinyl chloride. Only one of the four derailed car containing the vinyl chloride was breached releasing approximately 18,000 gallons of the hazardous material into the atmosphere. The other three derailed cars contained lumber, plastic pellets, and 29,000 gallons of "alcohol NOS" (NOS – not otherwise specified), respectively. The Coast Guard had jurisdiction over this incident because the hazardous materials (HAZMAT) release occurred in the Coastal Zone, on the East Jefferson Street Bridge, which is a swing bridge over Mantua Creek, an active navigable waterway. This incident was a Type 2 incident response based on Incident Management System (ICS) definitions.

Operational Data:

The resulting, mangled scene posed many complex operational and logistical issues, as well as hazards for responders and ultimately resulted in the evacuation of 260 households, the closure of businesses, and the cancellation of school for a continuous 6 day period within the affected area. Coast Guard Sector Delaware Bay, quickly assessed incident reports, dispatched first responders (investigators), to include Atlantic Strike Team (AST) personnel for site safety purposes, and activated the Sector's Incident Management Team (IMT). National Oceanic and Atmospheric Administration (NOAA) plume modeling was conducted immediately offsite by our Scientific Support Coordinator (SSC), and was vital in setting the ½ mile evacuation zone. Within twelve hours, the Coast Guard had mobilized \$10,000 worth of equipment and established an Incident Command Post at the Gloucester County Fire Marshal Training Center in Clarksboro, New Jersey. The Unified Command set objectives and priorities to ensure a safe and effective response which made the safety of responders and the public the main concern. Air quality monitoring patrols and fixed stations were established by the Environmental Protection Agency (EPA) and Conrail, the responsible party's, hired contractor, Center for Toxicology and Environmental Health (CTEH). Spikes in vinyl chloride readings received immediate attention. Preparatory discussions were held regarding possible school cancellations and shelter in place notifications. Using plume projection forecasts from NOAA, a mandatory evacuation of a 12 block area of the city of Paulsboro was conducted to ensure the safety of the approximately 42 households in the immediate area. A subsequent evacuation on 4 Dec caused the displacement of an additional 218 households resulting in a total of 680 residents and the entire Paulsboro School District being affected.

The complicated response operations involved a two phase evolution. The first phase was to remove product from and purge the breached vinyl chloride rail car and ensure that the tank car was safely inerted. This required two different operations over 7 days to remove the vinyl chloride vapors and liquid product from the rail car. The second phase involved using a 150-ton crane barge, with two tug boats to assist, to remove the four derailed cars from the waterway and placing them individually onto three deck barges, returning one directly to rail, before bridge repairs were completed, and resetting of the three remaining derailed cars not in the waterway back onto the tracks. The shallow, narrow waterway presented many logistical challenges to include extremely dangerous diving operations complicated by low visibility, tide changes

causing swift currents and whirlpools at the incident site. The proximity of the incident to the populated residential area caused significant security challenges and chemical manufacturing businesses down rail of the incident put considerable pressure on the Unified Command to promptly restore commerce. The U.S. Coast Guard cutters CAPSTAN and CLEAT alternated enforcing a safety zone for the incident to keep recreational vessel traffic away from the potentially toxic, flammable hot zone.

Support Data:

Coast Guard Sector Delaware Bay quickly assessed incident reports and dispatched first responders (investigators).

Various specialized Coast Guard Units provided support including the Atlantic Strike Team (AST) and the Public Information Assist Team. Various agencies and departments from the local municipality, county, and state responded. Additionally, other federal agencies (NOAA and EPA), and Conrail (the responsible party) and their contractors such as the Center for Toxicology and Environmental Health (CTEH) all provided a great deal of support.

There were other state and federal agencies that did not report to the ICP but provided vital support such as the NJ State Historic Preservation Officer and the Advisory Council on Historic Preservation Office of Federal Agency Programs.

A request for forces (RFF) was submitted within the first day of the incident asking the CG to provide a qualified PSC, LSC, and a Document Unit Leader (DOCL). However, competing resources from the aftermath of Super Storm SANDY in Sector New York's AOR limited Sector Delaware Bay's ability to receive qualified responders in a timely fashion.

Location of Operation:

Location of derailment: East Jefferson Street Bridge, Paulsboro, NJ (The bridge passes over Mantua Creek approximately one mile from the Delaware River.

Physical Address of ICP: Gloucester County Fire Academy, 210 County House Road, Clarksboro (East Greenwich), NJ 08020.

Location of Personnel:

Same as Location of Operations.

Objectives and Major Lessons:

- Ensure the safety and health of response personnel and the public.
- Continue assessment of all environmentally sensitive areas and ensure protective measures are consistent with area contingency plans, including protection of affected wildlife.
- Determine HAZMAT fate and effect of plume.
- Collect and disseminate accurate trajectory information.
- Manage coordinated interagency response.
- Implement measures to effectively contain, clean up, and dispose of potential product discharge.
- Keep the public, stakeholders, agencies, and media informed of response activities through proactive daily outreach in the affected areas.

LESSONS LEARNED:

See attachments.

Limitations and Casualties:

- * There was very little understanding of the principles of the ICS outside of the Coast Guard.
- * Many of the residents of Paulsboro, especially in the neighborhoods near the incident did not have transportation, cable or broadcast TV, or internet access and required different means to convey information, which made communications regarding the incident difficult.
- * A request for forces (RFF) was submitted within the first day of the incident asking for qualified PSC, LSC, and a Document Unit Leader (DOCL). However, competing resources from the aftermath of Super Storm SANDY in Sector New York's AOR limited Sector Delaware Bay's ability to receive qualified responders in a timely fashion.
- * This hazmat incident involved an initial release with exposure of first responders and many members of the community.
- * There was an initial evacuation area set and then the evacuation area had to be expanded several days later as a result of vinyl chloride readings. These two evacuations presented the UC with huge challenges of public information and expectation management for both the displaced residents as well as their neighbors who were sheltered in place repeatedly.
- * The perception of inadequate information was further enhanced by the inability to release data before it was subjected to quality assurance and quality control.
- * The instrumentation and databases used by contractors and EPA differed so significantly that both sets of data could not be displayed together.
- * Some residents of Paulsboro were without vehicles, did not normally use the internet, and many worked shifts, so communicating with residents was incredibly difficult.
- * Neither the state nor the county deployed any resources to assist with the public health or mental health needs of the community until air monitoring requirements needed to be met to re-open schools, 10 days after the incident began.

Participants:

Members from:

Coast Guard: Sector Delaware Bay, Coast Guard Auxiliary 5th Northern, PIAT, AST, Cutters CAPSTAN and CLEAT, Air Station Atlantic City.

Local: Paulsboro OEM, FD and PD, East Greenwich Township FD, Thorfare FD.

Gloucester County: Gloucester OEM, Sheriff's Department, County Fire Academy, EMS.

NGO: Red Cross.

State: NJDEP, NJSP, NJSP/OEM, SHPO, NJ Dept of Health.

Federal: National Oceanic and Atmospheric Administration (NOAA), EPA, US Fish and Wildlife, USDOT/Federal Railroad Administration, US Army Corps of Engineers.

Industry: Conrail (RP), Conrail customers (receivers of the hazmat material), Center for Toxicology and Environmental Health (CTEH).

Title	Identify Triggers for Augmenting Command Center
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	0 UNIFIED COMMAND
Core Component	Staff Mobilization
Recommended Action Area	Performance

Observation:

For the five (5) hours after the Command Center received the notification (approx 0745) of a train derailment with hazardous materials release, they experienced very heavy call volumes.

Discussion:

This incident resulted in a lot of calls coming into the Command Center. Additionally, there were other events occurring on 30 Nov from the routine calls to a Presidential visit into the area, which added to the workload.

Lesson Learned/Best Practice:

There needs to be a trigger point identified that determines the need for additional personnel to staff the Command Center.

Recommendation:

Review the Sector's WQSB and determine if individuals can be identified for Command Center supplementary staff. Include trigger points for calling in additional personnel in the SOP.

Comment:

Title	Prevent Calls from Bouncing to Command Center
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	3 LOGISTICS SECTION
Core Component	Communications
Recommended Action Area	Prevention

Observation:

The transition from the incident being managed by the Coast Guard Command Center to being managed by the multi agency incident management team (UC) went well.

Discussion:

Recently, Sector Delaware Bay has had a lot of opportunities to "practice" ICS (Hurricane Irene in 2011, PREP/AMSTEP Exercise, Hurricane 2012, and Hurricane Sandy in 2012). Additionally, the Sector conducted a number of training classes and drills to set up the ICP and transition from Command Center incident management to the IMT in the multi-purpose room (MPR) ICP. The most challenging part of setting up an ICP in the Sector's MPR is setting up the additional phone lines and phones in there. Phone batteries may need to be charged and getting the word to all responders that the phones are live can be time consuming. Busy calls to the MPR will bounce back to the Command Center, causing confusion as the Command Center Staffs don't realize that the ICP is stood up.

Lesson Learned/Best Practice:

Calls that inadvertently bounce from the ICP to the Command Center can cause confusion and limit efficiency of both entities.

Recommendation:

Implement a solution to prevent calls intended for the ICP from bouncing to the Command Center.

Comment:

Title	Re-Evaluate CIC Process & Section 1050 of ACP
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Notifications
Recommended Action Area	Policy

Observation:

The critical incident communications (CIC) process for this incident went well.

Discussion:

Command Center staff were well trained and knew the process to complete notifications up the Coast Guard chain. Additionally, there is an entire section in the Sector Delaware Bay Area Contingency Plan (ACP) on CIC. However, the section is very Coast Guard specific and may not be "fitting" to have in the ACP. It was also suggested that CIC went well because the Captain and the IMD Chief conducted the calls. However, while the IMD Chief was preparing for and participating in CIC teleconferences, she was not able to address the other issues that required her attention.

Lesson Learned/Best Practice:

1. Look at the process to conduct CIC teleconferences. Determine the best practice to conduct the communications. It was suggested that the SITL participate in the calls instead of the IMD Chief (Operations Section Chief) so that IMD/OPS is available to make decisions for actions that need to be handled in real time.
2. If SITL is to participate in the CIC teleconferences, the IMT (or parts of it) will need to be stood up immediately when the incident starts.

Recommendation:

Review Section 1050 of the Sector Delaware Bay ACP with the Area Committee. Update the section as necessary, so that it is not so Coast Guard specific. Include a statement that all agencies make notifications per their specific agency's policies.

Comment:

Title	Implement Use of ICS Coaches
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

The jobs that personnel are assigned in the IMT are not the primary jobs that they do on a daily basis. As a result, this inexperience causes some nervousness and apprehension.

Discussion:

There were some civilian personnel, at the Sector, who are ICS trainers, who could act as "coaches" to help inexperienced IMT personnel.

Lesson Learned/Best Practice:

Where possible, coaches should be assigned to guide personnel through the NIMS/ICS incident management processes.

Recommendation:

Implement creation of ICS positions for coaches.

Comment:

Title	Resolve Pay Issues - Emergency IT Support
Recommended Action	Recommend follow-on action COMDT
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	4 FINANCE/ADMINISTRATION SECTION
Core Component	Personnel Support
Recommended Action Area	Prevention

Observation:

At one point, early in the response, when all the first responder agencies were reporting to the ICP in Paulsboro, the wireless network and therefore the internet, went down.

Discussion:

Having IT support at the ICP is critical. Even though the ICP was set up in a county facility, CG IT support would have been helpful.

Lesson Learned/Best Practice:

1. Include IT staff in ICS training classes.

2. Include IT staff on WQSB to help set up the ICP either in the Sector's MPR or at a stakeholder's facility.

Recommendation:

Identify pay issues of using civilian IT personnel after hours to help set up an ICP.

Comment:

CG-CPE-3 comment: At the 2 May 2013 AAR Program Review, it was decided that CG-1 (civilian personnel) should look into this issue from a policy standpoint and provide review/comment.

Title	Review HAZMAT Release QRC - Safety
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	2 PLANNING SECTION
Core Component	Operate within management system
Recommended Action Area	Plans

Observation:

The afloat assets were enforcing a 24/7 safety zone.

Discussion:

As a result of the afloat assets enforcing the safety zone, they were not in a position to receive daily safety or operational briefs. During incident response, it's not uncommon for the afloat assets to report to an IMT "chain of command". The afloat assets need to understand the reporting process.

Lesson Learned/Best Practice:

1. Make arrangements to discuss chain of Command, daily work assignments, anticipated long term requirements, and provide afloat asset with daily safety briefs.
2. Include cutters in Hazmat Awareness Training.
3. Provide cutters with the 2012 Emergency Response Guide and training on how to use it.
4. Ensure that afloat assets get copies of the IAP, along with the site safety plan (208), and ICS-204s & 209s.

Recommendation:

Review Hazmat Release QRC and ensure that safety precautions for afloat assists and other CG responders are part of the document.

Comment:

Title	Train Personnel - Operating ICP/IMT Equipment
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

Some difficulty was experienced in getting the portable printers to work.

Discussion:

There is a lot of equipment that goes into setting up the ICP. This equipment is different than the equipment that IMT members use on a daily basis. As a result, some are unfamiliar with how to get the pieces of equipment to work. This adds stress to the overall situation.

Lesson Learned/Best Practice:

Personnel staffing an ICP/IMT need training on operating: the poster maker, portable printers, accessing the ACP electronically, and using the wireless system in the MPR. Software for these systems needs to be pre-loaded to ensure functionality during an incident.

Recommendation:

Provide training on ICP/IMT equipment.

Comment:

Title	Obtain ERG & HAZMAT Training
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	1 OPERATIONS SECTION
Core Component	Protection/Countermeasures
Recommended Action Area	Performance

Observation:

There is a lot of important information in the ERG. However, since most Coast Guard personnel at the Sector level don't use the ERG on a routine basis, they were unfamiliar with the ERG and what information they should be looking for.

Discussion:

This was a very complex incident with a number of first responders from many differing local, county, state, federal, and responsible party entities arriving on scene. It was easy to develop a false belief that the situation was safe and/or not to understand the scope of the incident.

Lesson Learned/Best Practice:

1. Look at response procedures. Ensure pre-departure safety briefs and GAR Model Assessment score(s) are completed and briefed up the command.
2. Look at out-brief procedures to ensure that all safety and health concerns for responders are captured.

Recommendation:

Arrange for ERG training from PHMSA. Also rrrrange for additional hazmat training for all responders and Command Center staff.

Comment:

Title	Develop Prioritization - RFFs for Multiple Inciden
Recommended Action	Recommend follow-on action District [CCGD 05]
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Personnel Support
Recommended Action Area	Policy

Observation:

This was a Type II incident. A request for forces (RFF) was sent up by the Sector. Although a RFF was sent up, the Sector didn't get the type of qualified individuals with the equipment they needed.

Discussion:

This happened for a few reasons. Super Storm Sandy response was still ongoing and the District's IMAT is not stood up.

Lesson Learned/Best Practice:

1. Stand-up, fund and equip the IMAT.
2. Reach out to the rest of the Coast Guard and bring in the qualified individuals that are needed in a response.

Recommendation:

Establish procedures to prioritize resources at the District level when multiple incidents are running concurrently.

Comment:

Title	Procure Smart Phones - MER Responders
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	3 LOGISTICS SECTION
Core Component	Communications
Recommended Action Area	Performance

Observation:

The Sector does not issue "smart" phones to the MER responders. As such, in some cases, MER responders were using their personal phones to send photos back to the IMT.

Discussion:

Smart phones or similar devices are needed by the MER responders. They can be used to take and send photographs and look up information on the internet.

Lesson Learned/Best Practice:

MER responders would be able to do their job more efficiently and safely if they had access to mobile internet capabilities.

Recommendation:

Purchase smart phones or other similar devices that MER responders can use to do their jobs.

Comment:

Title	Develop Maint Schedule - Software Currency
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	2 PLANNING SECTION
Core Component	Equipment maintenance & support
Recommended Action Area	Performance

Observation:

The ACP was not readily available in electronic format.

Discussion:

The ACP is located on a few stand alone laptops maintained by Contingency Planning/Force Readiness. There is also one hard copy available in the Sector's Contingency Planning and Force Readiness Office. However, when the Coast Guard Operations Section Chief (at times, the same individual also was the Planning Section Chief) was not able to open the ACP on a stand-alone laptop. This was probably because the free software to run the programs that operate the ACP had expired.

Lesson Learned/Best Practice:

To prevent accessibility issues, additional copies of the ACP and other important documents/references should be burned onto CDs or other media prior to an incident.

Recommendation:

Develop a schedule to check stand alone computers and ensure currency of software on each terminal.

Comment:

Title	Evaluate Check-in & Check-out Processes
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	2 PLANNING SECTION
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

There were two check in/out locations. Not all CG personnel properly checked-in or checked-out. It is important to establish correct "check-in and check-out" procedures immediately to properly account for personnel.

Discussion:

ICS teaches responders that the Check-In/Status Recorder (SCKN) are under Incident Planning. However, Incident Logistics needs responder information to properly account for the responder's time. Therefore, Logistics may need more information than the SCKNs are "capturing". More importantly, the response organization needs to know who's responding (especially in the field) and if they checked out at the end of the operational period. Additionally, at the ICP, personnel manually checked in & out, but it was difficult to understand hand-writing. Need closer monitoring of personnel.

Lesson Learned/Best Practice:

Train the SCKNs on the check-in and check-out process so that they ensure that the information that the response organization and especially the Logistics Section needs are completely and legibly captured.

Recommendation:

Evaluate improvement opportunities for the check-in & check-out processes. Assign SCKNs to the WQSB.

Comment:

Title	Bolster RFF Process - Tap CG Bench Strength
Recommended Action	Recommend follow-on action Area [LANTAREA]
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Staff Mobilization
Recommended Action Area	Policy

Observation:

A unit facing a major incident (Type I or II) must use all available means to staff an incident response. The entire Coast Guard represents the bench strength to pull from.

Discussion:

Many local (LANT/D5) resources were already tapped by the response to Super Storm Sandy, which had ravaged this region some 30 days prior to the Paulsboro Train Derailment. The perceived lack of bench strength on a local scale could have been alleviated by reaching out to other Districts and/or PAC Area for resources. It would also help to keep the RFFs general in terms of describing the capability needed; not ordering in specific resources or people.

Lesson Learned/Best Practice:

All units facing a major incident need a mechanism to expand the RFF process to tap resources outside their District if needed.

Recommendation:

LANT should DIRLAUTH w/ PAC Area to develop triggers for expanding an RFF to an outside District or Area for a major contingency response.

Comment:

Title	Review HAZMAT QRC Periodically
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	2 PLANNING SECTION
Core Component	Operate within management system
Recommended Action Area	Prevention

Observation:

The Hazmat QRC worked well.

Discussion:

Recently, the Sector's Hazmat QRC was updated. This incident was the first opportunity to test it.

Lesson Learned/Best Practice:

Have discussions with other first responder agencies to ensure that appropriate questions are asked of the reporting entity so that all agencies capture similar information to avoid confusion.

Recommendation:

Review the Hazmat Release QRC again. Determine if there are any lessons learned to add.

Comment:

Title	Watch Stander Awareness - ICP Contact #s
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

D5 continued to call the Sector Command Center after the ICP was set up.

Discussion:

Lesson Learned/Best Practice:

D5 was not aware that the ICP was established and continued to call the Command Center.

Recommendation:

Ensure District is aware the Sector's IMT has stood up in an ICP and the phone numbers are available to reach the ICP.

Comment:

Title	Encourage Mentoring of Personnel Outside CG
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Personnel Support
Recommended Action Area	Performance

Observation:

The RP's employees, as well as representatives from some of the local, county, and state first responder agencies were not that familiar with the ICS process.

Discussion:

Many RP, local, county, and state employees knew what needed to be done, but they were not that familiar with the ICS process. As a result, some felt that the process was hindering response. Others familiar with ICS felt that the process had to be followed to ensure that all UC objectives were identified and met.

Lesson Learned/Best Practice:

Provide ICS training seats to maritime stakeholders when conducting ICS training.

Recommendation:

Encourage Coast Guard responders to mentor personnel from other responding agencies.

Comment:

Title	Establish G-Mail Accounts - Incident Responses
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Communications
Recommended Action Area	Performance

Observation:

Personnel could not log onto CG systems to get e-mails. However, G-mail accounts were set up for various ICS Sections.

Discussion:

For various reasons, personnel had difficulty logging onto the CG network to communicate via e-mail. As a result, G-mail accounts were established. Personnel were able to send and receive e-mails to the G-mail accounts via stand-alone laptops.

Lesson Learned/Best Practice:

Provide training to all IMT personnel on CAC access to CG e-mail system and the CG SharePoint.

Recommendation:

As a best practice, set up G-mail accounts, if necessary, at future incidents. Provide training to IMT personnel on how to establish the G-mail accounts.

Comment:

Title	Ensure Situation & Resource Psnl Get Trng
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	2 PLANNING SECTION
Core Component	Other
Recommended Action Area	Performance

Observation:

There was a lack of "battle rhythm" in the early stages of the incident. As such, personnel didn't share as much information as they should have.

Discussion:

A lot of agencies and individuals cascaded into the ICP. Many were doing "new" jobs. Many were unfamiliar with each other and the ICS process. Personnel have to remember to share information.

Lesson Learned/Best Practice:

As CG personnel are probably more familiar with ICS than other responders and responsible parties, encourage all responders to use ICS forms and the ICS process .

Recommendation:

Ensure all personnel assigned to the Situation and Resource Units go to formal Situation and Resource training.

Comment:

Title	Encourage Agencies/RP to Fill Key Positions
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Personnel Support
Recommended Action Area	Performance

Observation:

There are certain ICS positions that should be filled during Type 3 and Type 2 responses. These positions could be filled by either CG or other responding agency personnel.

Discussion:

Type 3 and Type 2 responses require a lot of supporting staff. Section Chiefs and Unit Leaders need to quickly evaluate their staff needs and order personnel as needed, from CG assets or supporting and cooperating agencies. Additionally, Coast Guard civilians could be better used to help the IMT during regular business hours for various ICP positions. Whenever positions can be filled by representatives from various jurisdictions, the UC should decide the best fit.

Lesson Learned/Best Practice:

Sector IC should fill or encourage agencies or the RP to fill the following positions:

- Scribe for UC.
- Situation Unit Field Observers
- Logistics and Finance positions
- Sector Contingency Planning:

Review the ACP and ensure that the above recommendations are in the ACP.

Recommendation:

Consider using civilian employees in Contingency Planning and Force Readiness as Assistant Liaison Officers. Consider using the PIOs, PIAT, AST, and D5 IMAT as necessary to supplement staff.

Comment:

Title	Include Stakeholders in ICS Training
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Other
Recommended Action Area	Performance

Observation:

It took several days for the RP to fill the Logistics and Finance Section positions.

Discussion:

This may have been because the RP was unfamiliar with the ICS process.

Lesson Learned/Best Practice:

Include stakeholders in ICS training opportunities. (A well trained CG IMT is hampered by stakeholders who are unfamiliar with the process ICS)

Recommendation:

As a best practice request that the RP fill the Logistics and Finance positions ASAP.

Comment:

Title	Consider Assigning Air Monitors from AST
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	1 OPERATIONS SECTION
Core Component	Assessment
Recommended Action Area	Prevention

Observation:

An Atlantic Strike Team member was assigned to the cutters to take air samples.

Discussion:

It was a good idea to have AST personnel aboard the cutter to take air samples. It provided the cutter's crew a little more comfort knowing that this was being monitored.

Lesson Learned/Best Practice:

As a best practice, consider assigning AST air monitors to the afloat asset crew when the afloat assets are enforcing safety zones and there is a potential for exposure.

Recommendation:

Review the ACP's Hazmat Annex and update with air monitoring best practice recommendation.

Comment:

Title	Discuss Work Assignments & Expectations
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Personnel Support
Recommended Action Area	Performance

Observation:

When the decision is made to stand-up the IMT, there is a lot of work that needs to be done.

Discussion:

Some of the work to stand-up the IMT requires setting up the ICP in the Sector's multi-purpose room. There is a lot of work that the individuals assigned to various ICS positions need to do to begin to manage the response. The expectations of what needs to be done and by whom and when needs to be clarified. Regardless, the transition to an IMT managing the response needs to be accomplished quickly with people performing their assignments.

Lesson Learned/Best Practice:

The ICS "culture" needs to be ingrained in all personnel. This can be accomplished by various actions such as: formal training, quick reviews during all hands, "focused" drills/exercises, and even the Plan of the Week could be formatted into an IAP, among other things. It was suggested for the Concept of Exercise (COE) for Situation Unit drills could be that on a "drill day" the on-board Situation Unit Members could be given a scenario and then the Sit Members develop and present a brief in a "no threat" environment. This will give the personnel who don't normally provide a brief, an opportunity to brief.

Recommendation:

Provide an opportunity (prior to the next incident) for the Sector's ICS staff members to discuss work assignments and expectations. Clarify/prioritize work assignments.

Comment:

Title	Tap Locals to Decide on ICP Venue
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

All incidents start at the local level.

Discussion:

All incidents start at the local level and for a number of reasons, the ICP may be located in the community where the incident began.

Lesson Learned/Best Practice:

It is a good idea to take into consideration local knowledge when making important decisions, such as where to locate the ICP and staging areas.

Recommendation:

During an incident, reach out to the local responders and decide where the ICP will be located.

Comment:

Title	Adhere to ERG Minimum Safe Distances
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	0.4.2 Safety
Core Component	Protection/Countermeasures
Recommended Action Area	Prevention

Observation:

Some responders got too close to the incident.

Discussion:

A lot of responders from different agencies got into the ERG's half mile isolation zone. This helped to create the climate that it was "safe" if the other agency was there.

Lesson Learned/Best Practice:

Isolation zones are put in place to protect personnel from harm and need to be adhered to.

Recommendation:

All responders need to follow the ERG recommended isolation distances and maintain them until it is officially determined that it is safe to get closer. They must also know and use the needed PPE to get closer if necessary.

Comment:

Title	Use of Scientific Support Coordinators
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	2.3.2 Scientific Support Coordinator
Core Component	Personnel Support
Recommended Action Area	Performance

Observation:

The SSC was immediately available on the phone.

Discussion:

The SSC was able to provide information as to what was going to happen if the hazmat interacted with the water.

Lesson Learned/Best Practice:

Recommendation:

During an incident, reach out to the SSC for assistance.

Comment:

Title	Situation Unit - Use Overlapping Duty Sched
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	2.1 Situation Unit
Core Component	Operate within management system
Recommended Action Area	Performance

Observation:

The Situation Unit personnel had a lot of turnover. As a result, there was a continuous need to inform the Situation Unit personnel what was needed and expected at the briefs.

Discussion:

For a variety of reasons, there was a lot of turnover in the Situation Unit. As a result, there weren't enough continuity in the unit to give flawless, complete briefs as expected by the UC.

Lesson Learned/Best Practice:

Recommendation:

The Situation Unit should use a schedule of overlapping duty to maintain continuity.

Comment:

Title	Assess Need for Logistics Personnel
Recommended Action	Information only
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OTHER
ICS Category	0 UNIFIED COMMAND
Core Component	Staff Mobilization
Recommended Action Area	Performance

Observation:

There was a need to fill the Logistics Section Chief position from the start of the incident.

Discussion:

There can be no sustained response operations without logistics. Therefore, there was a need to have a Logistics Section Chief and other Logistics positions filled from the start of the incident. Once the positions were filled, response management improved. The positions probably were not immediately filled as there weren't many incidents that occurred within the Sector to give the IMT the experience to request the stand up the Logistics Section at an out-of-Sector ICP.

Lesson Learned/Best Practice:

If the complexity of the response is such that initial response actions were unable to bring the incident under control, or the duration of the response has increased, thereby requiring additional logistical support; identify staffing and space needs.

Recommendation:

During any incident where there is a stand-up of the IMT, receive briefs from the Situation Unit, Operations Section Chief and the IC.

Comment:

Title	Add State Health Officials in Contingency Plans
Recommended Action	Recommend follow-on action Unit
Start Date	30 Nov 2012
End Date	17 Dec 2012
Type of Contingency	OIL AND HAZARDOUS SUBSTANCE RESPONSE
ICS Category	2 PLANNING SECTION
Core Component	Protection/Countermeasures
Recommended Action Area	Prevention

Observation:

Evacuations became an important part of this incident response, due to the presence of a harmful vinyl chloride vapor cloud that originated from the derailed train.

Discussion:

While the Coast Guard had jurisdiction over the incident due to the navigable waterway nexus, ordering and executing evacuations is outside of the Coast Guard's authority/jurisdiction, and required state/local health official intervention to effect.

Lesson Learned/Best Practice:

The Coast Guard does not order evacuations and does not carry them out without buy-in from state/local agencies. The public perception on this point needs to be managed to accurately reflect this. Public perception during this incident was that Coast Guard was in charge of the evacuations. This false perception led to incorrect assumptions regarding the management of this incident.

Recommendation:

Update all contingency plans to include state/health officials in the decision and execution phases for implementing evacuations or shelter-in-place, or if a multi-casualty situation is imminent.

Comment: