

Attachment # 8: February 12, 2001 letter from L. Pilkey-Jarvis, WDOE re: Lessons Learned.

OPL
Bellingham, WA
June 10, 1999
DCA99-MP008



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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February 12, 2001

*300 Desmond Rd
Lacey, WA 98503*

National Transportation Safety Board
Tom Lasseigne
490 L'Enfant Plaza East, SW
Washington D.C. 20594-0003

Dear Mr. Lasseigne:

Thank you for the opportunity to respond to your letter concerning the investigation into the Olympic Pipeline rupture and fire on June 10, 1999. The Department of Ecology is an environmental regulatory agency for the state of Washington. Under state law, we are tasked to review and approve oil spill contingency plans for vessels and facilities operating in this state. The effectiveness of the spill response plans is then tested through a program of training exercises, which are evaluated by Ecology inspectors. Olympic Pipeline is one of Ecology's regulated facilities. The Department also maintains a 24-hour a day emergency response program. On June 10, our responders were on the scene at Bellingham within hours, and participated in the spill response for weeks after the incident. Let me address your three questions:

1. Responding to this incident:

It is quite challenging to rapidly mesh multiple local, state and federal agencies, as well as multiple private companies, into a cohesive organization in a matter of hours under emergency conditions. Our assessment of these emergency responses typically centers on an evaluation of command and control, or the management system employed to organize the response. In short, the Department of Ecology was pleased with the speed and selflessness with which the unified command structure was formed, and the emergency operations center activated in downtown Bellingham.

The unified command for environmental response formed within approximately three hours of the explosion. It was made up of representatives of the City of Bellingham, the State Department of Ecology, the U.S. Environmental Protection Agency and the Olympic Pipeline Company. Ultimately dozens of public agencies and private companies were integrated into this unified command structure.

During the first day or two, this unified command operated in the near background as the Bellingham Fire Department maintained command of the fire and spill zone, to ensure site safety and determine when it was safe for the environmental clean-up efforts to begin. There were no



arguments about this, nor were there significant organizational problems for the duration of the unified command's handling of the environmental clean-up phase of the emergency.

We believe the strengths of the environmental response include:

- A collaborative style of decision making in the unified command partnership.
- Full integration of local elected officials, minimizing political conflicts.
- Successful tapping of statewide and nationwide resources.
- Extensive involvement of local agencies with comprehensive knowledge and expertise of the Whatcom Creek watershed.
- Public Information - Rapid establishment of an incident specific web site.

We believe the lessons learned include:

- The need for incident command training for peripheral agencies and companies.
- The need to smoothly integrate site safety plans into response operations.
- The need to smoothly transition the emergency clean up to the long-term restoration of the damage to natural resources.
- The difficulties in gearing up fast enough for high media interest.

Please let me know if you would like further elaboration of any of these points, and I provide more details.

2. Joint Training Exercises:

The Department of Ecology measures the effectiveness of spill response contingency plans through a formal evaluation process. Specifically, we measure the performance of the regulated community against a list of objectives that each vessel and facility should meet within a triennial drill cycle. We invest considerable resources in this area, as do the many regulated vessels and facilities in Washington State. The following numbers give an indication of training exercises held in Washington for 1997-1999.

Type of Training Exercise	1997	1998	1999
Tabletop (or scenario based, larger scale drill)	21	35	39
Equipment Deployment	27	44	65
Other drill (e.g. haz-mat or regional, multi-organization exercise)	1	13	4

The numbers for 1997 include four pipeline company tabletop exercises and one equipment deployment. 1998 includes eight pipeline tabletops and six equipment deployments. 1999 includes four pipeline tabletops and twelve equipment deployments

I have included with this letter a list of the drill objectives we use in our evaluation. If you need more detail, please let me know. For example, I can provide information on our specific evaluations of Olympic Pipeline for the last three years if that would help your investigation.

3. Spill Response Plan:

The Department of Ecology and other federal and state response agencies have agreed to table the discussion of any changes to the Northwest Area Contingency Plan (NWACP) until after the

investigation and litigation picture of this incident has been settled. At that time, the Regional Response Team will examine lessons learned from the incident and incorporate any necessary changes into the NWACP.

Thank you again for the opportunity to contribute to this investigation process.

Sincerely,

Linda Pilkey-Jarvis

Linda Pilkey-Jarvis
Department of Ecology

Enclosure

cc: Paul O'Brien, Department of Ecology NWRO
Elin Storey, Department of Ecology NWRO
Anthony Barber, Environmental Protection Agency



Ecology Spill Drill Evaluation Checklist

Notifications (Addresses PREP Response Core Component #1)

___ Notification procedures identified in the contingency plan were followed

___ Internal spill response team was notified as per plan procedures.

___ Entire spill response organization including Primary Response Contractor/Oil Spill Response Organizations and government agencies were notified as per plan procedures.

___ Notifications were made in a timely manner (State of Washington Division of Emergency Management notified within one hour).

Staff Mobilization (Addresses PREP Response Core Component #2)

___ Mobilized the spill response organization described in the contingency plan.

___ The local/internal response team members identified in the contingency plan were mobilized and on-site.

___ Personnel were mobilized to meet Ecology's one or two hour response standards.

___ Regional/National ("away") response team members as identified in the contingency plan were mobilized in state within last five years for facilities and within the last three years for vessels.

Response Management System (Addresses PREP Response Core Components #3, #4, #5, #10, #11, #12, #13, #14 & #15)

___ Demonstrated the ability to operate within the spill management system described in the contingency plan.

Initial Response Management

___ Initial Site Safety addressed as per plan procedures.

___ Emergency shutdown procedures identified in the contingency plan were conducted (may be a walk-through).

- ___ Operations checklist(s) including the field document—identified in the plan were used.
- ___ Performed initial assessment of spill status (e.g., spill volume, product type, status of discharge/slick including consideration of environmental conditions).
- ___ Water Intake Protection: Demonstrated the ability to quickly identify water intakes and followed the proper protection procedures from the contingency plan or develop a plan for use.
- ___ Population Protection: Demonstrated the ability to quickly identify health hazards associated with the discharged product and the population at risk.
- ___ Field-tested plan holders initial response communication equipment and systems.
- ___ Local internal team members performed task assignments as described in the contingency plan (ERAP, Geographic Response Plan, and local internal team checklists).
- ___ Demonstrated smooth transition of the initial response to the spill management team through completion of an Initial Incident Briefing (ICS Form 201).

Response Management

- ___ Expanded response management team task assignments were consistent with the contingency plan and the Northwest Area Contingency Plan.

Note: The Northwest Area Contingency Plan recognizes the National Interagency Incident Management System (NIIMS) ICS model which specifies the following positions/functions: Responsible Party On-Scene Coordinator, Safety Officer, Liaison Officer, Public Information Officer, Operations Section, Planning Section (Resources Unit, Situation Unit, Environmental Unit, Documentation Unit), Logistics Section, Administration Section.

Unified Command and Command Staff

- ___ Demonstrated the ability of the spill response organization to work within the Unified Command Structure (UCS).
 - ___ Members of the Unified Command are identified and an Initial Incident Briefing was conducted (for example, using an ICS Form 201).
 - ___ Unified Command established overall response organization and ensured staffing.
 - ___ Unified Command developed and prioritized overall incident objectives and assessed if current and planned actions were consistent with those objectives. (ICS Form 202).
 - ___ Unified Command established Operational Periods, approved meeting schedules, and attended meetings as appropriate.
 - ___ Unified Command approved an Incident Action Plan (IAP).

___ Unified Command approved or authorized news releases and updates to the news media through the Lead Information Officer(s).

___ **Public Affairs:** Demonstrated the ability to address public affairs issues.

___ Public Information Officer (PIO) was designated.

___ Prepared at least one initial news release and one joint news release.

___ Joint Information Center (JIC) was established and provided timely and accurate information regarding the spill cleanup effort through news releases, availability of a Public Affairs staff, and news media briefings.

___ Provided information regarding the spill cleanup effort to local officials and citizens.

___ Ensured situation and status used for news releases and news conferences was consistent with Planning Section status.

___ Ensured appropriate representatives and technical specialists were present at all news briefings (for example: Unified Commanders, Scientific Support Coordinator, Environmental Unit Leader, and wildlife expert).

___ **Safety Affairs:** Demonstrated the ability to monitor all field operations and ensure compliance with safety standards.

___ Safety Officer designated.

___ Ensured a site safety plan was developed/approved by the Unified Command and communicated to appropriate field staff.

General Staff

___ **Operations Section:** Demonstrated the ability of the Operations Section to develop tactics and manage the implementation of approved action plans.

___ Operations Section was established as per the contingency plan.

___ Tactical assignments were made appropriate to the overall incident objectives and strategies.

___ Tactical assignments included strategies developed by the Planning Section (GRPs, GRP revisions, Shoreline Cleanup Assessment Team, Alternate Technology, Disposal, Wildlife, etc.).

___ Operations Section coordinated with the Planning Section to develop resource orders, tracking, and documentation (Operational Planning Worksheet: ICS Form 215, and Division Assignment Lists: ICS Form 204).

- ___ Operations Section coordinated with the Planning Section to ensure resource status changes and status displays were accurate.
- ___ Coordinated with local, state and federal operations representatives (if applicable).

___ **Planning Section:** Demonstrated the ability of the Planning Section to accomplish the following tasks:

- ___ Planning Section was established as per the contingency plan and included the following units/functions: situation, resources, environmental, and documentation.
- ___ Planning Section used the contingency plan, Northwest Area Contingency Plan, Geographic Response Plan, and/or other resource protection information.
- ___ Planning Section Chief established an appropriate meeting schedule. Planning cycle meetings include: Incident Briefings, Unified Command Meeting, Tactics Meeting, Planning Meeting, Incident Action Plan Preparation Meeting, Operations Briefing, News Conferences, and/or Special Purpose meetings.
- ___ Planning Section Chief facilitated and ensured appropriate attendance and participation at all scheduled planning cycle meetings.
- ___ Planning Section Chief ensured that the Environmental Unit Leader was prepared and attended the following meetings: Tactics Meetings, Planning Meetings, and News Conferences.
- ___ Prepared and maintained Command Post Display which included the following: Incident Summary, Weather, Tides, Situation and Planning maps, Response Objectives, Resources at Risk, Organization Chart, Incident Status Summary (ICS Form 209), Resources Status Detailed, and a Meeting Schedule.
- ___ Developed and maintained a Master List of all resources checked in at the incident including check-in, status, current location, estimated time of deployment, etc.
- ___ Developed an approved Incident Action Plan (IAP). Please note the content of IAPs may vary widely. Typically an IAP includes some or all of the following: Cover Page, Overall Response Objectives (ICS Form 202), Organization List (ICS Form 203 or 207), Division Assignment Lists (ICS Form 204), Communications Plan (ICS Form 205), Medical Plan (ICS Form 206), and Resources at Risk (ICS Form 212 or Form 232).
- ___ Documented the spill response effort (i.e., utilizing an historian, use of plan documentation forms, etc.).
- ___ Documented decisions made by the Unified Command.

Environmental Unit:

Note: As per the Northwest Area Contingency Plan, the plan holder is not expected to lead the Planning Section's Environmental Unit. However, the plan holder is expected to assist with the tasks listed in this section.

___ Unit Leader was a representative of a government natural resource trustee agency.

___ Plan holder assisted state/federal agency staff with the following activities:

- Identified all sensitive public natural and cultural resources likely to be affected by the spill, and set priorities for protecting these resources (ICS Form 232 or 212). Ensured this aspect of the Situation Display is kept current.
- Guided implementation of the Response Plan and Geographic Response Plans (GRPs).
- Worked with Operations Section to establish additional environmental protection strategies not identified in GRPs (if applicable).
- Established Shoreline Cleanup Assessment Teams (SCAT). Ensured shoreline clean-up assessment situation display was kept current (ICS Form 209).
- Used SCAT information to recommend shoreline cleanup recommendations, priorities, and restrictions. (Note shoreline cleanup guidance in NWACP).
- Provided technical review and recommendations regarding use of alternative technologies including in situ burning and dispersant applications.
- Developed an incident specific disposal plan consistent with the contingency plan and the Northwest Area Contingency Plan. Ensured Spill Status portion of the Situation Display was kept current (ICS Form 209).
- Coordinated with state wildlife rescue/rehabilitation operations, including volunteer management/training, and coordinated with Operations Section regarding implementation. Ensured Wildlife Situation Display was kept current (ICS Form 209).
- Coordinated wildlife hazing operations, as necessary.
- Provided information to Joint Information Center and media regarding natural resource concerns/impacts. Ensured that appropriate Natural Resource Agency technical expert attended all news briefings.

Logistics Section: Demonstrated the ability of the Logistics Section to provide necessary support for implementing incident action plans.

- ___ Coordinated and processed requests for resources.
- ___ Managed the implementation of the contingency plan's Communication Plan and prepared an incident Radio Communications Plan (ICS 205).
- ___ Developed or described a plan to ensure sufficient feeding, potable water and sanitary arrangements to meet all incident needs.
- ___ Developed a plan to provide personnel and equipment for all elements of the response.
- ___ Established a command post that accommodated the needs of the response organization.
- ___ Identified and planned for support facilities/areas as needed including equipment/personnel staging areas, helibase per contingency plan specifications, and Camps.
- ___ Developed a plan to provide ground, vessel, and aircraft support (includes vehicle, vessel, and aircraft maintenance).

Response Operations (Addresses PREP Response Core Components #2, #4, #6, #7 & #8)

- ___ Plan holder and response contractor field-tested the compatibility of communications equipment and systems (if applicable).
- ___ Resources as outlined in the contingency plan were mobilized to address Ecology's 6 and 12-hour planning standards. Credit may be obtained during joint in-state annual PRC deployment exercise.

Containment:

- ___ Demonstrated or described damage control procedures as identified in the response plan (such as plugging or patching a leak in a pipeline or storage tank).
- ___ Demonstrated or described containment of a land spill from entering water by channeling, diverting, or berming.
- ___ Facility began initial deployment of response equipment on-site within one hour.
- ___ Vessel plan holder began initial deployment of response equipment on-site within two hours.
- ___ Facility deployed containment boom equal to four times the length of the longest vessel/combination that transfers at the facility.

___ Facility completed deployment of containment boom equal to four times the length of the longest vessel/combination within two hours (This is optional).

___ Demonstrated the ability to contain spilled product at locations other than the point of discharge. Credit may be obtained during joint in-state annual PRC deployment exercise.

Recovery & Interim Storage:

___ Deployed initial recovery resources identified in the facility contingency plan to address a small spill scenario.

___ Demonstrated the ability to transfer or off-load recovered product to on-shore storage facilities. (If applicable)

Protection:

___ Plan holder field-tested facility specific GRP strategies. (If applicable)