

SECTION I: The Incident Command System

1. Agency Jurisdiction:

The U.S. Environmental Protection Agency (EPA) and the Alaska Department of Environmental Conservation (ADEC) are the lead Federal and State oil spill response agencies per the National Contingency Plan and Alaska State statutes/regulations. Both the Bureau of Land Management (BLM) and the Alaska Department of Natural Resources (ADNR) have clean-up oversight authorities arising from the stipulations of the State and Federal Right of Way Leases, but work with EPA /ADEC to coordinate these authorities. Other agencies involved in this incident with significant support roles include U.S. Department of the Interior (DOI), U.S. Department of Transportation Office of Pipeline Safety (DOT-OPS), and the Alaska Department of Fish & Game (ADF&G). All of these agencies are represented in the Joint Pipeline Office (JPO).

2. Background:

After the Exxon Valdez Oil Spill in 1989, the Incident Command System (ICS) (which grew out of wildland firefighting) has been applied to oil and hazardous substance spill response as an incident management system of national and state choice. Alaska state regulations require oil industry response plans from companies such as Alyeska Pipeline Service Company (APSC) and also specify the use of ICS to manage a response effort. The Alaska Federal / State Preparedness Plan for Response to Oil and Hazardous Substance Discharges / Releases (the Federal and State government's response plan) utilizes the ICS / Unified Command (UC) as the Federal / State unified response organization for use in Alaska.

Upon discovery of the oil discharge, APSC immediately activated their Fairbanks Business Unit Incident Management Team (IMT) and opened an Emergency Operations Center (EOC) at the Fairbanks Doyon Industrial Facility. APSC's IMT utilizes the ICS to organize and manage spill response. Upon notification of the Federal On-Scene Coordinator (EPA) and the State On-Scene Coordinator (ADEC) by APSC, both organizations sent representatives to APSC's EOC and the spill site. A Unified Command consisting of APSC, Federal and State government employees was established within the first several hours of the response.

3. Observations and Recommendations:

A. Command and Control:

(1) Unified Command:

- a. Observation:** While the UC (composed of APSC's Incident Commander, Federal and State OSC's) provided joint command and control over oil spill response actions (including source control), further work needs to be done to ensure that the concerns and focus of the BLM Authorized Officer (AO) and ADNR's State Pipeline Coordinator (SPC) are reflected throughout the incident management. The roles of Federal and State OSC's are to ensure an effective response to oil and hazardous substance spills, while the AO/SPC's roles are focused on asset protection issues such as pipeline repair and return to service. While there is commonality between these roles, there are also separate and

discreet functions. This incident worked well with a BLM representative from the JPO functioning as a BLM/ADNR Liaison / alternate FOSC in the Unified Command, and a representative from DOT-OPS working with APSC's pipeline repair unit. While there was excellent sharing of information and duties within the staff assigned to the spill, communications between the UC and JPO senior management could be enhanced by exploring new methods for direct meetings and information flow.

Recommendation: Methods for using the ICS's planning cycle, existing Incident Management Teams, and Crisis Management Teams need to be further explored and detailed in a written plan. Checklists for activating technical specialists available from JPO to mobilize and integrate into an IMT as well as procedures for establishing routine communications between the UC and the AO/SPC should be included. Additional preparedness exercises (as held in the past) need to be continued involving not only spill responders but also the AO/SPC or their representatives along with members of JPO with technical expertise in pipeline operations and repair. The JPO should maintain a contact phone staffed 24 hours a day during significant events.

- b. Observation:** Both the Federal and State agencies and APSC need to expand on integration of their response staff. Technical specialists from government agencies were generally based at their office and they worked the spill remotely. Due to the relative short duration of the emergency phase of this event and the limited size of the spill impact area, this arrangement worked fine but the information flow and understanding of needs can be improved if the specialists were co-located with the IMT. The agencies and APSC need to share tables in the various ICS sections and workgroups and address critical issues as soon as possible.

Recommendation: Further training and participation during joint exercises will foster and further develop working relationships and information flow.

(2) Command Staff:

- a. Observation:** A Joint Information Center (JIC) was established early on and consisted of APSC's Corporate Communications personnel and media specialists from the JPO and ADEC. ADEC assisted this effort with the establishment of a world wide web site for the Unified Command. Press releases/ updates, digital photos, as well as agency situation and pollution reports were routinely and frequently posted. The JIC and associated web site provided an excellent source of public information.

Recommendation: Continue practice as a routine.

- b. Observation:** Two weeks after the incident, four additional bullet strikes were discovered on the backside of the pipe near MP 400 (approximately one mile north of the spill site). Although APSC conducted a wide area check for additional bullet strikes within the first 12 hours of the response, these strikes were missed.

Recommendation: Personnel conducting reconnaissance in response to potential future shooting incidents should consider this event and recall that bullet strikes may be extremely small and difficult to detect.



Figure I-1: The Incident Management Team at the Fairbanks EOC.

B. Operations Section: (Also see section on Containment and Cleanup Actions)

(1) **Observation:** Unlike wildland firefighting activities, use of the ICS to manage oil spill response often involves an IMT located in an EOC remotely located from on-site field activities. APSC places its Operations Section Chief in the field and establishes an Operations Liaison position located in the EOC with the rest of the IMT. This situation requires clear and constant communications between the two positions to ensure there is no disconnect between field operations and the IMT. Communications between the field and the IMT early on during the response could be improved, especially when developing and disseminating Incident Action Plans (IAPs). As the incident progressed and an on-site field command center with enhanced communications was established, information flow between the two levels of the response organization improved.

Recommendation: Establish an on-scene command post / center early on in the response and post IAPs conspicuously, ensuring task force leaders are briefed at shift changes. Also see Planning Section observations and recommendations below.

(2) **Observation:** During the first hours, the Unified Command decided to consider this as a worst case spill and boom the Tolovana River (because of the situation and the time of day). This was not properly communicated to the Operations Section.

Recommendation: It is critical to maintain communication between sections of the ICS during the initial "Ops driven" phase of the response to track UC decisions which pertain to that phase, prior to production of the first IAP.

C. Planning Section:

Observation: The Situation Unit experienced difficulty early on in getting detailed information from the site. On-scene personnel were completely occupied and reacting to the immediate needs of the response. By the end of the second day, IMT personnel from the Resource Unit and the Situation Status Unit were dispatched to the field to gather information directly.

Recommendation: Consider establishing and deploying a support structure "go team" earlier in the incident to scope out the site, review and assess problems and issues, make judgment calls for logistics and support, then either return to the EOC to directly report status and information gained, or report information over available communications systems.

D. Logistics Section: No Observations/Recommendations identified.

E. Finance/Administration Section: No Observations/Recommendations identified.

F. Other Related Issues

Observation: Having pre-established relationships with other response community members such as Alaska Clean Seas, SERVS, FBI and the Alaska State Troopers contributed to the overall success of the response. Alaska Clean Seas brought in North Slope clean-up expertise and improved establishment of site work zones and decontamination stations. SERVS equipment such as shore vacuum systems and Desmi hydraulic viscous oil pumps augmented pipeline response equipment and improved oil recovery operations. The presence of the FBI and Alaska State Troopers at APSC's EOC as well as on site provided coordinated law enforcement and security with APSC resources.

Recommendation: Continued training and participation during exercises with each of these entities will foster and further develop working relationships.