



Instruction Pages Oil Spill Contingency Plan Boilerplate for Railroads – Washington Administrative Code 173- 186

Purpose and Use of these Instructions

These are two pages of instructions to assist railroad facility “plan holders” to write approvable plans that meet the standards in Revised Code of Washington (RCW) 90.56.210 and Washington Administrative Code (WAC) 173-186. This boilerplate document can be used in two ways:

1. Use it as an outline to compare and update to your existing plan.
2. Use as a template/fillable form to develop a plan to send to the state.

How to Use this Document

The template/boilerplate is organized to walk you through putting together an oil spill contingency plan that meets the state standards. We have formatted the pages in an order that maximizes the usefulness of the plan during spills – this is important. Your plan is a tool that should be useful to you. We encourage the use of forms, tables, diagrams and checklists for the plan.

The pages need to be replaceable when updates occur. It also increases usefulness if you use indexing tabs when you put the plan in a binder. Another tip is to use appendices for administrative information.

The following is a color coded key of each instruction:

Provide us your company - specific information: When you see yellow highlights, this means we are telling you in general terms the information you need to write meet the requirement – but you need to supply the specifics on the operations/administration of your railroad

Use this language: When you see blue highlights, this means we are providing specific language that would meet the requirement. You can modify it, but this is the type of language we are looking for.

Reference in an appendix in the plan: When you see green highlights, this is information that is best placed at the end of you plan as an appendix. If this is the case, please ensure that both a reference statement such as “see Appendix XX” and the Table of Content reflects this part of your plan.

Other Things to Know and Consider

Terms Used in this Boilerplate

There is some suggested terminology in this boilerplate that may differ from the company specific terminology that you use. When you encounter that in this template/boilerplate, please substitute the terms you use. We are not trying to prescribe terminology in the template/boilerplate.

- Example: In section XX we use the term Emergency Railroad Coordinator to mean the person taking the first actions after a spill. You may call this position something different, such as Qualified Individual or Person-In-Charge.

How to Request an Alternative in Your Plan

You may have an idea for an alternative way to meet a requirement in your plan. This means that because of the unique nature of your business, there is a better way for reaching compliance. Ecology will consider the alternative and decide whether it can be approved or not. The standard to be met is that the better idea must offer an equal or higher level of protection than the regulation.

As examples, you may ask for an alternative to the drill program or to the types and quantities of equipment you have access to (equipment planning standards).

It is best for you to work with us as soon as you start thinking of an alternative. The request should be submitted in the form of a letter at the same time as the plan, as well as being described in the plan. It will be part of a thirty day public review period and comment period. The request needs to include, at a minimum:

- (i) A reference to which planning standard(s) in this chapter the proposal will be substituted for;
- (ii) A detailed description of the alternative proposal including equipment, personnel, response procedures, and maintenance systems that are being proposed; and
- (iii) An analysis of how the proposal offers equal or greater protection or prevention measures as compared to the requirement in this chapter.

How to Use Your Federal Plan and Meet the State Standards?

One useful model is to maintain your federal plan as a Core volume, and add the Washington specific information as an appendix. You can ask to see other plans (such as those for vessel companies) that use this approach if it would help.

How would an “Umbrella” Plan work?

An umbrella plan would be written to apply to all railroad operators that choose to enroll in it together. The content is the same and appendices would be used to provide all of the company specific rail information. Each enrolled member would train on the use the plan in the event of spills or significant threats of spills.

When Ready to Send Ecology Your Plan:

Here is some guidance:

- Remember to delete color coded text and highlights.
- Delete the instructional pages.
- Check footnotes in the document and ensure accuracy of the date and version of the plan you are submitting.
- Number your pages – the plan must have page numbers in it.
- Check the reference table carefully to ensure all pages are correctly identified.
- Send us one hard copy and an electronic version if possible. Send to:

Ecology Spill Prevention, Preparedness & Response
PO Box 47600
Olympia, WA 98504-7600

This ends the instruction pages. The next page is the start of the boilerplate plan.

Insert Company Name

Oil Spill Contingency Plan

Insert Date – Month, Year

In place of this page, you should insert your plan approval certificate once you receive it from Ecology.

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CROSS REFERENCE TABLE

Provide this information: This is a cross reference between the regulatory requirements and where the specific information can be found in the plan. Please indicate all of the page number(s) or the appendix (appendices) where the information is located. In some cases the information will be found in more than one location. In this example, we are citing the section of this boilerplate plan.

WAC 173-186 Cross Reference	Section
WAC 173-186-130 Annual plan maintenance	1.3
WAC 173-186-140 Significant changes to approved plans.	1.3
WAC 173-186-150 Post-spill review and documentation procedures	4.8
WAC 173-186-210 Binding agreement	Page ii
WAC 173-186-220 Contingency plan general content	
(2) Statement committing to the Northwest Area Contingency Plan.	1.3
(3) The name, location, type and address of the facility and the federal or state requirements intended to be met by the plan.	2.1 1.1
(b) Size of the worst case spill volume.	2.3
(c) Log sheet to record revisions and updates to the plan.	Page i
(d) Table of contents	
(e) List and map of expected rail routes in Washington, description of the operations covered by the plan. An inventory of above ground storage tanks and tank capacities (if applicable).	2.1 2.2 App D
(f) List of all oil cargo oils, including region of origin, oil types, physical properties, and health and safety hazards of the oil cargo. A description of where the SDS is kept for emergency response use.	2.4
(g) The PRC's name, address, phone number or other means of contact.	3.4
(i) A contract or letter summarizing the terms of the contract signed by the PRC. Or if the entire contract is not submitted, a statement that the documents will be available for inspection if requested by ecology.	App A
(ii) Mutual Aid agreements (if applicable)	App A
(h) Description of the spill management team	3.3
(i) An organizational diagram depicting the chain of command for the spill management team for a worst case spill.	
(ii) An ICS organization list of one primary and one alternate person down to the section chief and command staff level. If a response contractor is used to fill positions, a statement that they shall agree in writing. A contract or statement that it will be made available for inspection if requested by ecology.	3.3 App A
(iii) A detailed description of the planning process and job description for each spill management position, or a statement committing to the planning process or job descriptions contained in the NWACP.	3.1
(iv) Description of the type and frequency of training that the spill management team receives. Statement committing to training new employees prior to assigning them to critical positions.	5.2
(v) Identify a primary and alternate incident commander's representative that can form unified command at the initial command post, and if located out-of-state, a primary and alternate incident commander that could arrive at the initial command post within six hours.	3.3

(i) Description of notification procedures in a clear order of priority.	4.2
(i) A list of the names and phone numbers of required notifications to government agencies, response contractors and spill management team members.	4.2
(ii) Identification of the central reporting office responsible for implementing the notification process.	4.2
(iii) Include a form to document those notifications.	App E
(j) Each plan shall contain the procedures to track and account for the entire volume of oil recovered and oily wastes generated and disposed of during spills. The responsible party shall provide waste disposal records to ecology upon request.	4.6
(k) Spill assessment procedures.	4.3
(i) Commitment statement to update notifications. Forms that will be used for such documentation.	4.1, 4.3, App E
(ii) Checklist for significant steps used to respond to a spill.	App E
(l) Ground water assessment methods and resources.	4.3.4
(m) Information on oil spill liability claims of damages.	4.7
(n) Description of containment, enhanced collection and diversion tactics for spill response.	4.4
(i) Information on natural, cultural and economic resources.	4.4 App F
(ii) Refer to the GRPS or describe sensitive areas and tactics for environmental protection. Control points for areas where GRPs do not exist.	4.4.1
(o) Each plan shall identify potential initial command post locations.	3.5
(p) Each plan shall contain a description of how the rail plan holder meets each applicable planning standard in Section C of this chapter.	4.5
WAC 173-186-230 Field document	App H
(1) List of the locations where field documents are kept.	4.1
WAC 173-186-310 Equipment planning standards	
(2) A list of all planning points applicable to the rail operations.	4.5
(3) Contracts, mutual aid agreements, letters of intent to meet the requirements.	App C
WAC 173-186-320 Maintenance records for oil spill response equipment	App B
Description of the spill response equipment maintenance program. Commitment statement to keep records for five years and make them available to Ecology. List of all equipment, or statement that it is maintained on the WRRL.	App B
WAC 173-186-330 Planning standards for crude oils	
(1) Letter of intent showing access to necessary equipment	4.5.1 App A
WAC 173-186-340 Planning standards for in situ burning	4.5.2
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WAC 173-186-500 Drill participation, scheduling and evaluation	5.1
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WAC 173-186-510 Type and frequency of drills	5.1

Record of Revisions

Revision Number	Revision Date	Description of Change / Sections and Pages Revised	Initials

In place of this page, you should download the Binding Agreement form located here:

<https://fortress.wa.gov/ecy/publications/documents/ecy070550.pdf>

Once signed, insert the original signed version to replace this page.

1. Introduction

(Use this language) The purpose of this oil spill contingency plan is to provide guidelines to quickly, safely, and effectively respond to oil spills large and small. This plan provides tools and guidance to the *(Insert company name)* that ensures our capability of mounting an effective and rapid response to an oil spill in Washington.

1.1 Regulatory Requirements

The plan is developed to meet the following regulatory requirements. *(delete any that do not apply).*

1.1.1 Federal *Describe the federal regulatory requirements your plan meets.*

1.1.2 State *Describe the state regulatory requirements your plan meets for oil spill response.*

(Use this language) This plan is intended to meet the requirements of Revised Code of Washington (RCW) 90.56.210 and Chapter 173-186 of the WAC for the state of Washington.

1.1.3 Other *Describe any other regulatory requirements that your plan meets, if any.*

1.2 The Northwest Area Contingency Plan

(Use this language) In Washington, the Northwest Area Contingency Plan (NWACP) developed under the National Contingency Plan serves as the statewide master oil and hazardous substance contingency plan required by RCW 90.56.060 and meets federal requirements for regional and area planning. This plan is prepared to be consistent with the NWACP and the *(Insert company name)* fully commits to following NWACP policies and procedures during a response to an oil spill and during drills.

1.3 Plan Update Process

(Insert company name) will implement the following process to ensure this plan is updated as required.

Plan Update Process	
Update Type	Process
Annual	The plan will be evaluated at least once a year. Updates to the plan will be submitted to Ecology for review. If there are no changes to the plan a letter will be submitted annually to Ecology confirming the plan is up to date.
Significant Changes	Ecology will be notified within 24 hours of any changes considered significant as defined in WAC 173-186-140. Any required changes to the plan will be submitted to Ecology within 30 days.
Spills and Drills	Lessons learned to improve the plan will be incorporated back into the plan as updates.
Administrative	The plan may be updated periodically as a result of minor changes in process and personnel. Updates to the plan will be submitted to Ecology for review.

5 Year Approval	At least 65 days ahead of the expiration date of the plan, this plan will be provided to Ecology for a full review.
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2.0 Rail Facility Information

2.1 Facility Information and Description of Operations

Provide a detailed narrative description of rail oil related operations (including the below topics as applicable)

- Description of all rail routes in Washington where oil is transported as cargo;
- List of facilities you receive or deliver oil to/from
- Location of the company storage tank locations, if any. This should also include a list of the tanks and their storage volumes
- Description of fueling locations for rail operations, if any
- Locations where loaded rail cars are temporarily stored, if any.

2.2 Map of Rail Routes and Facilities

Map of **Insert company name** rail routes and facilities is included in **Appendix D**.

2.3 Worst Case Spill Volume

The worst case spill planning volume for Washington State oil spill contingency planning requirements has been calculated in the table below. The worst case spill planning volume is calculated using the fuel capacity of the locomotive(s) used to transport tank cars plus the total volume of the greatest number of rail tank cars carried at one time.

Insert company name Worst Case Spill Information and Calculations	
Fuel capacity of locomotive(s) <i>(Typical fuel capacity is 119 barrels or 5,000 gallons)</i>	Barrels (bbls)
Greatest number of rail cars carried (based on 714 bbls per car)	

Calculation of Worst Case Spill Volume	
Fuel Capacity of Locomotive(s):	_____ bbls.
Train Volume: Greatest number of tank cars carried * 714 =	_____ bbls
Worst Case Spill Planning Volume: Fuel Capacity of the locomotive + Train Volume =	_____ bbls
Worst Case Spill Planning Volume	_____ bbls

More than one worst case spill volume can be provided if your rail operations differ along routes. If more than one applies, complete calculations for all locations.

2.4 List of Oil Cargo Types

The following table lists all types of oil transported under this plan. Safety Data Sheets are available for each type of oil and may be obtained by responders in the event of an emergency.

Region of Origin	Oil Type	Physical Properties of the Oil Type
Safety Data Sheets	Safety Data Sheets (SDS) are maintained at <i>insert location</i> _____. SDS's may be obtained by contacting:	

	Name _____ Title _____ Contact Information _____
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3.0 Response Organization

3.1 Incident Management Planning Process and Job Descriptions

If your organization incident management planning process and job descriptions are consistent with NWACP you can use the following language in this section.

(Use this language) In an emergency response ***Insert Company Name*** will use the Incident Command System (ICS) for oil spill response management as outlined in the NWACP.

Otherwise, if your organization intends to use a different planning process or differs from the Area Plan in job descriptions when responding to oil spills, please provide a detailed description of the process and job description of each individual in the response management system.

3.2 Emergency Railroad Coordinator (Person-In-Charge)

Provide a narrative description identifying an Emergency Railroad Coordinator (or use your specific terminology such as Qualified Individual or Incident Commander) who is assigned by company management to be available on a 24-hour basis, who is familiar with the implementation of this plan. Use the table provided to list the names, location and contact information for all personnel who may need to be contacted.

Example language:

The ***Insert company name*** Emergency Coordinator has authority from company management to make decisions and authorize response actions. The Emergency Coordinator receives notifications from company personnel who have observed an oil spill or an incident that has the potential to become a spill. The Emergency Coordinator will ensure the following:

- Assigning an appropriate incident commander or request formation of a unified command.
- Notification of all oil spill response personnel, response contractors, spill management team members, government agencies and company representatives consistent with the notifications required under this plan.
- Identification of the character, source, amount, and extent of the release and other necessary items needed for notifications.
- The ability to authorize the use of resources and work with appropriate federal, state and local authorities to ensure the appropriate ICS response structure is formed.

Emergency Coordinators		
Position	Location	Name and Contact Information
Emergency Coordinator		
Emergency Coordinator		
(list as many as you have)		

3.3 Spill Management Team

Provide the following information on the Spill Management Team. This must include one primary and one alternate for key position down to the Section Chief level. If positions are filled by contracted personnel, provide a written agreement to staff the positions and evidence of the agreement is provided in an Appendix.

Insert company name SPILL MANAGEMENT TEAM ROSTER		
Position	Primary	Alternate
Incident Commander <i>Must be able to arrive in-state within six hours</i>		
Information Officer		
Liaison Officer		
Safety Officer		
Operations Section Chief		
Planning Section Chief		
Logistics Section Chief		

Finance Section Chief		

3.4 Response Contractor Information

Provide the following information for the Primary Response Contractor (PRC). You must use a contractor approved by Ecology. The list is found here: <http://www.ecy.wa.gov/programs/spills/preparedness/prc/Prc.htm>

(Use this language) The PRC (s) for this plan is/are identified in the following table. The PRC(s) capability provided meets planning standards for Washington State.

A contract or letter summarizing the terms of the contract signed by the PRC is included in Appendix A of the plan. The contract will be made available to Ecology for inspection upon request.

Primary Response Contractor Information		
Name	Address	Primary Contact

Other Contractors that may be used to supplement a response to an oil spill or assist during drills but are not needed to meet Washington State planning standards are listed below.

Secondary Response Contractor Information		
Name	Address	Primary Contact

3.5 Incident Command Post

(Use this language)

The following pre-identified locations may be used for incident command posts. Additional locations may also be used depending on the specific location of an incident.

Command Post Name	Location/Address	Capacity/Available Equipment

3.6 Mutual Aid Agreements

List any Mutual Aid Agreements and summarize the terms. Include a copy of the agreement in the Response Resources appendix (Appendix A of this template).

4. Initial Response Actions and Notifications

(Use this language) The first *Insert company name* company employee on scene will function as the Person-in-Charge until relieved by a person who has been assigned to assume the role of the Incident Commander. The Person-in-Charge shall initiate the initial response actions under Section 4.1.

4.1 Initial Response Actions

(Use this language)

See Appendix H for the Field Document.

The field document lists time critical information for the initial emergency phase of a spill or a substantial threat of a spill. This includes spill detection and assessment procedures, notification procedures and documentation procedures. The field document and is kept in the following locations:

(list all).

4.3 Spill Assessment and Tracking

(Use this language)

Insert company name will initiate spill assessment and tracking upon notification of a spill. Spill assessment and tracking are needed to ensure response operations are commensurate with the potential of the situation. Initial assessment and spill tracking may be done from landside using visual observations made from the specific vantage point or location near the spill site. As soon as possible, however, tracking equipment will be deployed to assist in monitoring oil movement. Additional assessments may be done from air observations, weather permitting. Air overflight arrangements should be made with primary response contractors or other available resources. Updated spill reports will be provided to the Incident Command.

Initial assessment will include product type, potential spill volume, and environmental conditions including tides, currents, weather, river speed and initial trajectory as well as a safety assessment including air monitoring. This assessment will be conducted by initial personnel on scene and be continued by response personnel. An initial assessment will be conducted consistent with an initial spill assessment checklist located in **Appendix E**.

4.3.1 Product Type and Potential Spill Volume

Product Type and Potential Spill Volume	
Product Type	<i>Provide instructions and information sources where product type can be located, such as cargo manifests.</i>
Potential Spill Volume	<i>Provide instructions for determining potential spill volume, such as number of cars that are currently affected and number that could be potentially affected and what the product volume is in those cars.</i>

This information will be documented as part of the initial assessment.

4.3.2 Spill Assessment: Environmental Conditions

(Use this language)

Data on current environmental conditions is necessary to assist in spill assessment, including determining trajectory, area of potential impact, and potentially impacted resources. The following conditions will be collected and documented as part of the initial and on-going spill assessment.

Environmental Conditions	Information Source
General	
Topography (to determine potential movement of the spill and receptors - is there the potential for the spill to reach water?)	USGS topographic maps, Google Earth
Air and Water Temperature	NOAA website
Wind Speed and Direction	NOAA website
Precipitation	NOAA website
Potentially impacted sensitive resources	Appendix F, GRPs, NWACP, Ecology Spills Map, ERMA
Marine Waters	
Tidal data	NOAA website
Current speed and direction	NOAA website
Sea state	NOAA buoy website
Freshwater	
Flow Rate/Discharge	USGS
River Gradient	USGS
River Stage/Seasonal Water Level	USGS
Tidal Influence	USGS and NOAA

4.3.3 Trajectory

(Use this language)

Oil spill trajectories may initially be estimated using the available environmental conditions and information from the initial spill assessment to predict direction and speed of the slick movement. Trajectory calculations provide an estimate of where oil slicks may impact shorelines and other sensitive areas and provide an estimate of the most likely locations for protection, containment, and recovery.

Insert company name will generate trajectories using accepted methodologies. Trajectory analysis and fate and effect modeling may be generated by subject matter experts including primary response contractors, consultants and government agencies such as NOAA as necessary to evaluate oil movement.

Resources for Trajectory Analysis	
Name of Resource	Contact Information Number (24 hours)

4.3.4 Health & Safety

(Use this language)

Insert company name will comply with federal requirements are contained in the Occupational Safety and Health Act (OSHA) and Washington State Industrial Safety and Health Act (WISHA) regulations regarding Hazardous Waste Operations and Emergency Response. Health and safety guidelines to protect personnel, visitors, and the public from physical harm and exposure to hazardous materials or wastes are critical to a safe response and will be communicated and documented.

Site safety meetings/briefings are the first step in maintaining site safety. Daily meetings will be held for all phases of operations at the start of each shift to ensure that all personnel understand site conditions and operating procedures, to ensure that personal protective equipment is being used correctly, to address worker health and safety concerns, and to communicate any changes or revisions to the Site Safety and Health Plan. Briefing Attendance Forms shall be used to document that individuals working the Response Operation recognize the hazards present and the policies and procedures required to minimize exposure or adverse effects of these hazards.

A Site Safety & Health (SS&H) Plan will be prepared for any spill or incident to comply with applicable federal, state and OSHA regulations as well as company policies. The plan will address procedures and information for program administration, safety and health considerations, air monitoring, personal protective equipment, medical surveillance, training, site control, industrial hygiene monitoring programs, personal hygiene, sanitation, housekeeping, and the decontamination of both personal protective equipment and equipment utilized during the response.

Requirements, procedures and forms for formulating a Site Safety and Health Plan are maintained in the Health and Safety Job Aid, Response Tool 9203, NWACP. The incident Commander, for smaller spills or Unified Command for larger spills will set data management protocols, and reporting criteria and time frames specific to the characteristics of an incident. NWACP Response Tools 9202 (Joint Information Center Manual) and 9210 (Liaison Manual) contain guidance for communication for reaching at-risk populations.

Insert company name Health and Safety Assessment Procedures	
Person/Group responsible for conducting initial site Assessment	

Procedures for conducting initial site safety assessment	
Resources, including federal, state and local, available to conduct air monitoring and evaluate public health impacts	
Data will be reported and managed by	
Communication methods used to deliver critical health information including potential evacuation procedures.	

4.3.5 Air Monitoring

(Use this language)

Air monitoring is performed for airborne hydrocarbons during a response to protect both responder and communities. Local fire departments and response contractors are available to provide initial air monitoring and initial site characterization (such as hot-warm-cold zones and evacuation zones). This may be all that is needed, depending on the size of a spill. The NWACP contains information about air monitoring and responder/community safety.

In a larger response, air monitoring will be conducted at the direction of the Incident Commander or Unified Command. The Safety Officer will define monitoring activities within the Site Safety & Health Plan and may direct and coordinate air monitoring activities. Laboratory analysis may be required for some monitoring samples. Results will be made available to the Unified Command to develop appropriate strategies to protect responder and public health (such as shelter in place guidelines). All updates must be retained and attached to the Site Safety & Health Plan.

Air Monitoring Parameters			
Parameter	Monitoring Procedure	Equipment	Action Threshold

Air Monitoring Equipment Available and Maintained				
Type	Quantity	Parameters	Detection Limits	Location

Local fire departments, health department or local Emergency Managers may help communicate safety messages relating to air monitoring. The NWACP Response Tools 9202 (Joint Information Center Manual) and 9210 (Liaison Manual) contain guidance for communication for reaching at-risk populations. Messages will be provided to the public at the direction of the Incident Commander or Unified Command via acceptable communication protocols developed by the Safety Officer, Public Information Officer and Liaison Officer.

4.3.6 Groundwater

(Use this language)

Spills to ground may impact ground water. The following procedures are followed to assess potential impacts to groundwater.

Groundwater Assessment Procedures	
Methods used to assess impacts to groundwater	<i>Insert procedures</i>

The following resources are available for investigating, containing, and remediating/recovering spills to groundwater.

Groundwater Resources		
Resource	Capability	Contact Information
<i>Insert Name of Company</i>	<i>Investigation and sampling</i>	
<i>Insert Name of Company</i>	<i>Containment and Recovery</i>	
<i>Insert Name of Company</i>	<i>Remediation Services</i>	

4.4 Resource Protection

(Use this language)

Minimizing damage to environmental, cultural, and economic resources is an objective common to all oil spill response efforts or significant threats of spills. Strategies for protection of environmentally sensitive habitats, protected areas, cultural and economic resources, and endangered and protected species, are initially addressed during contingency planning and then refined and tailored to the specifics of an actual response. Protection of vulnerable resources generally involves the use of the containment and clean up actions including enhanced collection and diversion tactics, recovery of oil and deployment of NWACP geographic response plans.

As part of the response, *Insert company name* commits to assess natural, cultural and economic resources, coastal and aquatic habitat types and sensitivity by season, breeding sites, presence of state

or federally listed endangered or threatened species, and presence of commercial and recreational species, physical geographic features, including relative isolation of coastal regions, beach types, and other geological characteristics; public beaches, water intakes including both drinking and agricultural water supplies, private and public wells that supply drinking water, and marinas; shellfish resources, significant economic resources and vulnerable populations to be protected in the geographic area covered by the plan.

Insert company name also commits to using the tools available in the NWACP for identifying, protecting and managing impacts to natural resources.

NWACP Response Tools for Identifying and Protecting Resources-at-risk	
http://www.rrt10nwac.com/NWACP/Default.aspx	
9408	Resources At Risk Response Tool
9403	Compliance Guide for National Historic Preservation Act during an Emergency Response
9404	ESA Emergency Consultation Guidance
9409	Managing Impacts to Commercial, Recreational and Tribal Fisheries
9420	Northwest Area Shoreline Countermeasures Manual
9421	Shoreline Cleanup and Assessment (SCAT) Response Tools

4.4.1 Geographic Response Plans (GRPs)

(Use this language)

As part of the NWACP and Washington State contingency planning requirements **Insert company name** will implement geographic response plans (GRP) based upon the specific location of the spill. GRPs will be used to protect sensitive resources in the geographical area of the spill or used to make notifications to downstream water users.

These strategies identify targeted resources such as wildlife and shellfish. These response plans can also be found online at the NWACP RRT website at: <http://www.rrt10nwac.com/GRP/Default.aspx>

The NWACP geographic response plans contain this type of information. The following GRPs are developed for the areas in which **Insert company name** operates:

Provide a list of the GRPs that would be applicable in the area.

If you operate in an area where GRPs do not yet exist, provide us your company - specific information

For sensitive areas where GRP's or descriptions of how environmental protecting will be achieved do not readily exist, **Insert company name** has developed the following "Control Points" for waterways in the vicinity of the railway operations.

(Include all data)

A description of applicable resources is contained in **Appendix F**.

The following sources may be consulted when identifying sensitive resources: *Delete if not applicable in the area in which you operate*

- Washington Department of Ecology Spills Resources at Risk Interactive Map
<http://ecyapit/coastalatlantools/spillresponse.aspx>
- NOAA online mapping tool ERMA (Environmental Response Management Application) for the Pacific Northwest <https://erma.noaa.gov/northwest/erma.html#/x=-120.95568&y=46.09146&z=7&layers=1+14384+7942+1284+16116>
- Washington Department of Fish & Wildlife Priority Habitats and Species Interactive Map
<http://wdfw.wa.gov/mapping/phs/>
- Washington Department of Archaeology and Historic Preservation Online Searchable Database for locating designated historical sites. <http://www.dahp.wa.gov/learn-and-research/find-a-historic-place>
- Washington Department of Ecology Water Resources Explorer online searchable tool
<https://fortress.wa.gov/ecy/waterresources/map/WaterResourcesExplorer2.aspx>

4.4.2 Wildlife Response

(Use this language)

If wildlife has been impacted or is at risk of impact from a spill, the Wildlife Branch will be activated as part of the Operation Section as outlined in Chapter 9310 – Wildlife Response Plan of the Northwest Area Contingency Plan (NWACP). Wildlife operations will be carried out in accordance with the NWACP as well as the requirements of the Washington State Department of Fish and Wildlife (WDFW) care rules (WAC 232-12-275) as well as other state and federal requirements.

Insert company name maintains a contract with *insert primary response contractor name* who maintains access to approved wildlife rescue and rehabilitation equipment. These resources shall have the capability to arrive on scene within twenty-four hours of spill notification. A list of these organizations is provided below.

Insert company name also has access to *insert permitted organization name* who can provide trained wildlife handlers that have both federal and State of Washington rehabilitation permits, and oil spill-specific federal permits to handle oiled wildlife.

Wildlife Rescue and Rehabilitation Resources		
Resource	Capability	Contact Information
<i>Insert Contractor</i>		

<i>Insert Permitted Wildlife Organization Name</i>		

4.5 Equipment Planning Standards

(Use this language)

Equipment planning standards are met with contracted equipment, services, and personnel, or through mutual aid agreements. Actions and response resources used in an actual spill will depend on the specific circumstances of the incident and its location.

The following table lists the equipment planning standards applicable to the coverage of this plan as defined in WAC 173-186-310. There is also a general description of the operations applicable to each planning point respective area and the associated worst case spill volume.

Planning standard spreadsheets produced by Ecology are the primary means to demonstrate necessary resources to meet these standards. Spreadsheets for each planning point identified in the following table are located in **Appendix C**. *If a planning point does not exist for an area in which a railroad operates, you must propose a planning point in the table below.*

Equipment Planning Standards	
Planning Points	Description of Operations
<i>Insert applicable planning points</i>	<i>Insert a general description of the type of operations and types of oils carried the applicable areas.</i>
Bellingham	
Mukilteo/Everett	
Seattle	
Tacoma	
Centralia/Chehalis	
Longview/Kelso	
Aberdeen	
Vancouver	
Coulee City	
Tri-Cities (Kennewick)	
Colfax	
Clarkston	
Spokane	
Colville	
Pend Oreille/Coleville National Forest	
Okanogan	
Wenatchee	

Yakima/Union Gap	
Moses Lake	
Bingen	

***Insert this sentence only if company owns its own spill response equipment. Additional company owned equipment available for spill response is located in **Appendix B**.

4.5.1 Planning Standard for Crude Oils

*** If your company does not transport or handle crude oil, use the following language:

Insert your company name does not transport or handle crude oils.

*** If it your company transports crude oil complete information in following paragraph.

(Use this language)

Insert company name maintains a letter of intent with *insert primary response contractor name* to meet the planning standards for crude oils. *Insert primary response contractor name* maintains the resources and/or capabilities necessary to respond to a spill of oil that may sink, weather or submerge. Please refer to the PRC application for information regarding contracted resources. Evidence of this capability is located in **Appendix A**.

4.5.2 Planning Standard for In-situ Burning

(Use this language)

Insert company name has contracts with *insert primary response contractor name* to meet the planning standards for In Situ Burning. Please refer to the PRC application for information regarding contracted resources. Evidence of this contracted capability is located in **Appendix A**.

In-situ burning will not be used unless directed by a Unified Command and as authorized by the Regional Response Team. *Insert company name* will follow the applicability determination, and approval processes outlined in Chapter 9407 of the Northwest Area Contingency plan prior to the use of In Situ Burning.

4.5.3 Planning Standard for Shoreline Cleanup

(Use this language)

Insert company name has contracts with *insert primary response contractor name* to meet the planning standards for shoreline cleanup. These resources are capable of being on-scene within 24 hours of notification. Please refer to the PRC application for information regarding contracted resources. Evidence of this contracted capability is located in **Appendix A**.

Insert company name also has the following resources available to assist with shoreline cleanup operations:

Company Resources for Shoreline Cleanup	
Resource	Information including type, use and contact numbers
Personnel	

Equipment	
Other	

If none available mark as none or N/A

4.6 Waste Management

(Use this language)

A large volume of waste can be generated during an oil spill cleanup. The collection, storage, transport, treatment, and disposal can require a significant logistics effort and must be managed in compliance with local, state and federal regulations. Types of waste include recovered oil, oily debris, oiled material such as sorbent and boom, contaminated PPE, contaminated soil, and oil/water mixes. Non-oiled waste from staff support and logistics must also be considered.

At the onset of a response a waste management plan must be prepared to describe the details of how waste will be managed and how the entire volume of recovered oil and oiled wastes will be tracked and accounted for over the course of the response effort. The plan covers all aspects of waste management including regulatory compliance, quantities and types of waste, waste minimization and segregation, temporary and interim storage, transport, and disposal arrangements.

Insert company name commits to using the waste management plan format contained in the NWACP. The NWACP contains a detailed response tool for incident-specific waste management - Response Tool 9405, Disposal Guidance for Washington State
<http://rrt10nwac.com/Files/NWACP/2016/Section%209405%20v17.pdf>.

This guidance, including the template incident disposal plan and waste management tracking forms, will be used during a response. Waste disposal records will be provided to Ecology, if requested.

4.7 Claims

(Use this language)

The following describes a claims spill liability process for claims of damages to persons or property, public or private, for which a responsible party may be liable.

Claims Documentation Form is located in **Appendix G**.

Claims Information	
Person/Group Responsible for managing claims	Name:
	Contact Information:

<p>Procedures for Advertising Claims</p>	<p>Indicate whether there is a pre-designated phone number or email account. If not, describe how these tools would be established. What level of spill would typically trigger this action.</p> <p>The plan should indicate how and at what point the plan holder will advertise for claims after an oil spill occurs. When and how this occurs will vary depending on the size of the spill, and the number of claims anticipated. The anticipated geographic extent of the spill will be the primary guidance on selecting the publications in which to run the claims advertisements.</p>
<p>Procedures for Managing Claims</p>	<p>This will likely vary depending on the size of the spill or the size of the company's response to the incident.</p> <p>What types of claims can be filed? For example, claims of damages, loss of earnings or revenue, loss of subsistence use of natural resources, costs of uncompensated oil spill removal.</p> <p>Are there time limits for filing various types of claims?</p> <p>What types of claims are not handled under this process, for example, natural resource damage claims.</p>

4.8 Post-Spill Review

(Use this language)

Following a response, *Insert company name* will conduct a debriefing with concerned parties (Ecology, EPA, Coast Guard, other state and federal agencies, company management, etc.). The plan will be updated if necessary to improve response actions.

5. Drills, Training, and Equipment Maintenance

5.1 Drills

(Use this language)

Insert plan holder company name is committed to participate in Washington's drill program to ensure improvements to plans and responses. Ecology shall be provided an opportunity to help design and evaluate tabletop and deployment drills. To ensure that there is enough time to fully design or plan drills, the regulation requires that deployment drills are scheduled 30 days in advance; tabletops are scheduled 60 days in advance and worst case drills are scheduled 90 days in advance.

Washington State Drill Schedule

Drills will be scheduled on the RRT10/Northwest Area Committee website at <https://fortress.wa.gov/ecy/naces/>.

Type of Drill	Frequency of drill	Instruction for scheduling
Table top exercise	One annually	Must be scheduled at least 60 Days in advance
Deployment exercise	Two in each year	Must be scheduled at least 30 days in advance
Worst case exercise	Once every three years, within a triennial cycle	Must be scheduled at least 90 days in advance
Wildlife exercise	Once within a triennial cycle	Must be scheduled at least 30 days in advance

5.2 Training

(Use this language)

Insert company name will ensure that all response personnel are trained to meet applicable federal and state Occupational Safety and Health standards and for emergency response operations. These requirements, commonly referred to as HAZWOPER regulations, were established to ensure the health and safety of personnel involved in response and cleanup operations.

Insert company name maintains the following Spill Management and Response Personnel Team Training Schedule. New employees shall receive training prior to being placed into critical ICS positions.

(This is the minimum level of training which must occur – **add the frequency of training** you require)

Position	ICS*	NWACP	GRPs	Company OSCP	?????	Hazwoper*
Incident Commander						
Information Officer						
Liaison Officer						
Safety Officer						
Operations Section Chief						
Planning Section Chief						
Logistics Section Chief						
Finance Section Chief						
Insert other personnel as needed						

5.3 Equipment Maintenance

***** If company does not own spill response equipment, use the following statement:**

Insert company name does not own spill response equipment. *Insert company name* maintains a contract *insert primary response contractor* name who provides an equipment maintenance program to meet the equipment maintenance planning standard. Maintenance records are kept for a minimum of 5 years and made available to Ecology. All equipment is listed on the WRRL and the planning standard spreadsheets.

***** If the company owns equipment an equipment maintenance program must be included unless listed on the Western Region Response List (WRRL), see example in **Appendix B**.**

Appendix A

Response Resources

To be included in this Appendix

- 1. *Contracts or Letters confirming PRC coverage***
- 2. *Contracts or Letters confirmed wildlife response coverage.***
- 3. *Mutual Aid Agreements***
- 4. *Lists of specialized response resources such as wildlife response organizations and response consultants for modelling, technical specialists, IAP software, sampling, etc.***
- 5. *Other logistical resources to support your plan.***

Appendix B

Equipment and Maintenance Programs

B.1 Plan Holder Owned Equipment

Plan holders that own oil spill response equipment should list their equipment in this section.

B.2 Equipment Maintenance Program

Plan holders that own oil spill response equipment should list their maintenance program in this section.

How often is the equipment inspected? What personnel are responsible for the maintenance program? What are your procedures? Where is the paperwork kept and for how long (minimum of five years)?

Include a statement that the records will be made to Ecology upon request.

Appendix C

Planning Standard Spreadsheets

Insert Completed Planning Standard Sheets provided by Ecology. These will be provided after the initial plan review.

Appendix D

Rail Route and Facilities Map

Appendix E
Spill Assessment, Information and Notification
Reporting Forms

Spill Assessment Checklist

Completed	Task	Initials
	Ensure health and safety of responders and the public as necessary. Conduct site safety health assessment and safety briefing prior to operations in the field.	
	Determine Source and Location	
	Determine if the source is controlled or if it is an ongoing release. If continuous, determine release rate.	
	Estimate volume and size of spill (dimensions of sheen or pooled oil) and type of product – see section 4.3.1	
	Determine receiving environment – land, water, or land with potential for waterway impact	
	Implement site safety assessment and air monitoring procedures – see section 4.3.3	
	Consider immediate impacts to workers and public and action evacuation and continuous air monitoring, as needed.	
	Assess direction and rate of movement of spill, and implement spill tracking procedures and equipment – see section 4.3	
	Evaluate environmental conditions (topography, wind, currents, tides, flow rate, etc.) for influence on spill trajectory and response actions – see section 4.3.2	
	If spill to land, evaluate potential for groundwater impact – see section 4.3.4	
	Make all required notifications	
	Ensure incident commander is assigned and ICS is implemented. If large spill ensure unified command is initiated.	

Oil Spill Information and Notification Report Form

Used to document initial spill information and notifications conducted as part of the response

Initial Information and Notification to Company Reporting Office or QI by Person-In-Charge. Person in Charge is the person initially observing and reporting the spill. This form shall be maintained as part of on-going assessments.

Contact or Information Type	Information
Name and telephone number of person reporting the spill	
Date and time of the call	
Name of person contacted (Specify if Management or QI)	
Specific location of the Spill	
Type of oil or product(s) Spilled	
Estimated Quantity	
Actions Taken To-Date	
Assistance Required	
Injuries	
Weather Conditions	
Reason for discharge (if known)	

Documentation of all Notifications	
Notification	Contact Information
Nat'l Response Center (NRC) at 800-424-8802	Contact Name: Date/Time of Contact: Report # given by NRC
WA Emergency Management at 800-258-5990	Contact Name: Date/Time of Contact: Report # given by WEMD
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:
	Contact Name: Date/Time of Contact:

Appendix F

Sensitive Resource Descriptions

Sensitive Resources	
Include contact information and/or seasonal information where applicable	
Environmental	
State and Federally listed Endangered and Protected Species:	<i>Include known breeding/nesting areas and life cycle data</i>
Coastal and Aquatic Habitat Types:	<i>Include sensitivity by season and physical geographic features, including relative isolation of coastal regions, beach types, and other geological characteristics</i>
Protected areas:	<i>For example: wildlife refuges, state or national parks, national forest, marine sanctuaries, etc.</i>
Shellfish Resources:	<i>Locations of shellfish habitat</i>
Important commercial and recreational species:	<i>Include known breeding/nesting areas, life cycle data and seasons of importance for commercial and recreational use</i>
Social and Cultural	
Recreational Areas:	<i>Show names, locations, and contact information</i>
Public Beaches:	<i>Show names, locations, and contact information</i>
Reservation Land or Usual & Accustomed Areas:	<i>Show names, locations, and contact information</i>
Historical Sites:	<i>Show names, locations, and contact information</i>
Economic	
Water Intakes – Drinking water:	<i>Show location and contact names</i>
Water Intakes – Agricultural use:	<i>Show location and contact names</i>
Private and Public drinking water wells:	<i>Locations, including lat and long coordinates, and capacity</i>
Marinas or Ports:	<i>Show names, locations, and contact information</i>
Shellfish Resources:	<i>Locations of harvesting areas or aquaculture businesses</i>
Population Points:	<i>Include name, location and population</i>
Hatcheries:	<i>Locations of fish hatcheries</i>

Appendix G

Claims Information and Documentation Forms

Insert company Claims Information Documentation Form

Example Claims Documentation Form

1. Claimant Information:

Name:

POC:

Address:

Telephone:

Fax:

Email:

2. Provide Incident Details, if available:

Date & Time injury or Damage Discovered:

Location of Injury or Damage:

Position (Lat/Long) of Injury or Damage:

3. Describe the injury or damage you are claiming:

4. Did you have any prior contact with *Insert company name* regarding your claim? With who?

5. What is the type of claim you are submitting and what is the total monetary amount you are claiming in U.S. dollars?

Claim type: _____

Total Amount Claimed: \$_____

6. Have you or your legal representative submitted the claim to an insurer or another responsible party before submitting this claim to *Insert company name* ?

(Yes/No) – if “yes” provide date claim submitted to insurer or other RP and provide contact information

7. If the claim was submitted to an insurer or another responsible party, what response (written or verbal) or payment did you receive? (i.e. Insurer took no action, denied the claim, stated they had no money to pay the claim, made only partial payment or \$\$\$, or other – explain)

8. Describe the nature and extent of injuries or damages claimed, as supported by the documentation you are submitting with this claim:

9. Description of how the injury or damage was caused:

10. What actions did you take, if any, to minimize the injury or damages you claim?

11. Witnesses:

(Provide the name, address, telephone number, & email address) of anyone who witnessed the injury or damage you claim. Also provide a summary of each witness's knowledge of the injury or damage claimed, and/or the incident which caused the injury or damage.

Name:
Address:
Telephone Number:
Fax:
Email:
Summary:
Name:
Address:

Name:
Address:
Telephone Number:
Fax:
Email:
Summary:

13. List of Documents & Attachments:

14. Claimant's Signature & Date:

I, the undersigned, certify that, to the best of my knowledge and belief, the information contained in this claim represents all material facts and is true. I understand that misrepresentation of facts may result in legal action against me.

_____ Date: _____
Signature of (claimant)

15. Legal Representative's Signature & Date:

Is this claim being presented to **insert company name** by your legal representative? If so, the legal representative must also sign this claim and provide contact information.

_____ Date: _____
Signature of Legal Representative
Representative's Name:
Address:
Telephone Number:
Fax:
Email:

Appendix H

Field Document

Initial Response Actions and Notifications

Provide this information – this is example language that you can use or modify according to your own procedures: The first Company employee on scene will function as the Person-in-Charge until relieved by a person who has been assigned to assume the role of the Incident Commander. The Person-in-Charge shall initiate the initial response actions as follows in this Field Guide.

Initial Response Actions

In the event of a spill:

Stop the Flow

Contain the Spill

Ensure the safety of anyone in the area

Assess the Spill – and document Information to be Reported

Initiate the Emergency Response Notification System

Immediately upon discovery of a spill, responding personnel should identify the location of the spill, isolate the area, stop the flow if possible ensure the safety of any people in the immediate area and initiate notifications to a central reporting office or a Qualified Individual (QI) as directed as follows in this Field Guide.

Step 1: Assess the Incident/Spill

Information about the spill should be as clear, concise, accurate and timely as possible. The minimum information reported, for initial report and update reports, should be:

1. Name and Telephone Number of the Caller
2. Date and Time of the call
3. Specific location of the Spill
4. Type of oil or product(s) Spilled
5. Estimated Quantity
6. Actions Taken To-Date
7. Assistance Required
8. Injuries
9. Weather Conditions
10. Reason for discharge (if known)

Use the Spill Information Report Form located in this Field Guide.

Step 2: Notify Central Reporting Office/Emergency Coordinator/Qualified Individual (QI)

The initial **Person-in Charge** shall notify Central Reporting Office or a Qualified individual (QI) who is responsible for initiating response actions and calling out resources. The person taking the call, the QI or a designee shall initiate notifications of response contractors, government agencies, spill management personnel and other notifications identified in this plan. The QI shall ensure there is an IC appointed to manage the incident. The QI may also function as the IC. Once the QI has been notified Steps 2 through 4 below shall be initiated as soon as possible. All notifications shall be documented on a spill notification report form located in Appendix E and the Field Guide.

Step 2: Notify Primary Response Contractor

Primary Response Contractor Notifications	
Response Contractor Name	Contact Number (24 hours)

Step 3: Notify National Response Center (NRC) and Washington Emergency Management Division (WEMD)

All spills of oil or hazardous substance into navigable waters and/or groundwater as defined by the Clean Water Act (CWA) and all spills of a reportable quantity of hazardous substances (40 CFR Part 302) must be immediately reported by the spiller to the National Response Center (NRC) and Washington Emergency Management Division (WEMD). The NRC will contact appropriate local US Coast Guard (USCG) or Environmental Protection Agency (EPA) offices. WEMD will notify appropriate Department of Ecology Responders. Both NRC and WEMD will be notified.

REPORT THE FOLLOWING SPILLS TO NRC AND WEMD WITHIN 1 HOUR OF DISCOVERY:

- ALL SPILLS OF ANY SIZE TO WATERS OF THE STATE
- SPILLS THAT THREATEN TO ENTER WATERS OF THE STATE
- SPILLS OF UNKNOWN QUANTITY
- SPILLS TO GROUND

National Response Center (NRC)
1-800-424-8802

Washington Emergency Management Division (WEMD)
1-800-258-5990

Step 4: Make all other notifications directed under this plan

The following Company and Spill Management Team personnel shall be notified.

Company Management and Spill Management Team Members	
Name	Contact Number

The following government agencies shall be notified.

Notifications to Government Agencies	
Government Agency Name	Contact Number

The following shall be notified.

Additional Notifications	
Name	Contact Number