



Oil Spill Response Best Management Practices

Steve Merritt

Spill Response Best Management Practices



- Divide and Conquer
- Leverage Regional QIs and Corporate EHS/Control Centers
- Don't become dependent upon an OSRO (Organic vs. Outsourced)
- Identify Control Points
- Establish an "Alamo" Point and work upstream from there
- Manage risks by minimizing unmanned FRP facilities

Divide and conquer?

Primary QI (Incident Commander)

- Conducts required notifications
- Orders OSROs, recovery equipment, and other response resources
- Maintains situational awareness of operations and containment/recovery efforts

Alternate QI (Operations)

- Secures the source of the release
- Deploys equipment to contain and recover spilled oil
- Manages incoming response resources
- Protects resources at risk

Leverage Regional QIs, Corporate EHS, and Control Centers?

- Consider using Regional QIs and/or EHS for required notifications
- Support logistics, and resource requests from corporate offices
- Risk management decision-making and activating the IMT
- Control centers can shut-in pipelines or isolate tanks for source control, if needed
- Initiating landowner access requests and staging area/command post siting

In House vs. outsourced response teams?

In House (Facility Personnel)

- Direct control of resources
- Familiar with FRP and facility discharge paths and control points
- Quickest for containing the spill and mitigating impacts
- Often have better communication with QIs

Outsourced (OSROs/CO-OPs)

- May be unfamiliar with control points and slow to respond to facility
- Unknown and often variable capabilities/knowledge
- Scalable for larger incidents
- Can bring specialized capabilities (ISB, ice, etc.)

Managing risks from spills at unmanned facilities?

- Suboptimal and risky for FRPs to be unmanned regularly
- Increases the chances of spills going undetected longer
- Often unmanned due to remote siting, increasing chances that an OSRO or response team will have a delayed response
- EPA initiates GIUEs at unmanned facilities based upon telephonic notification to number at the gate
- Source control and initial response actions often hampered