SHANNON ESTUARY

OIL SPILL CONTINGENCY PLAN

SEA-PT
Shannon Estuary
Anti-Pollution Team

Shannon Foynes
PORT COMPANY

APPROVED BY:	**IRISH COAST GUARD**
EFFECTIVE DATE:	**6TH MARCH 2018**
COPY NUMBER:	**1**
ISSUED TO:	**SEAPT**

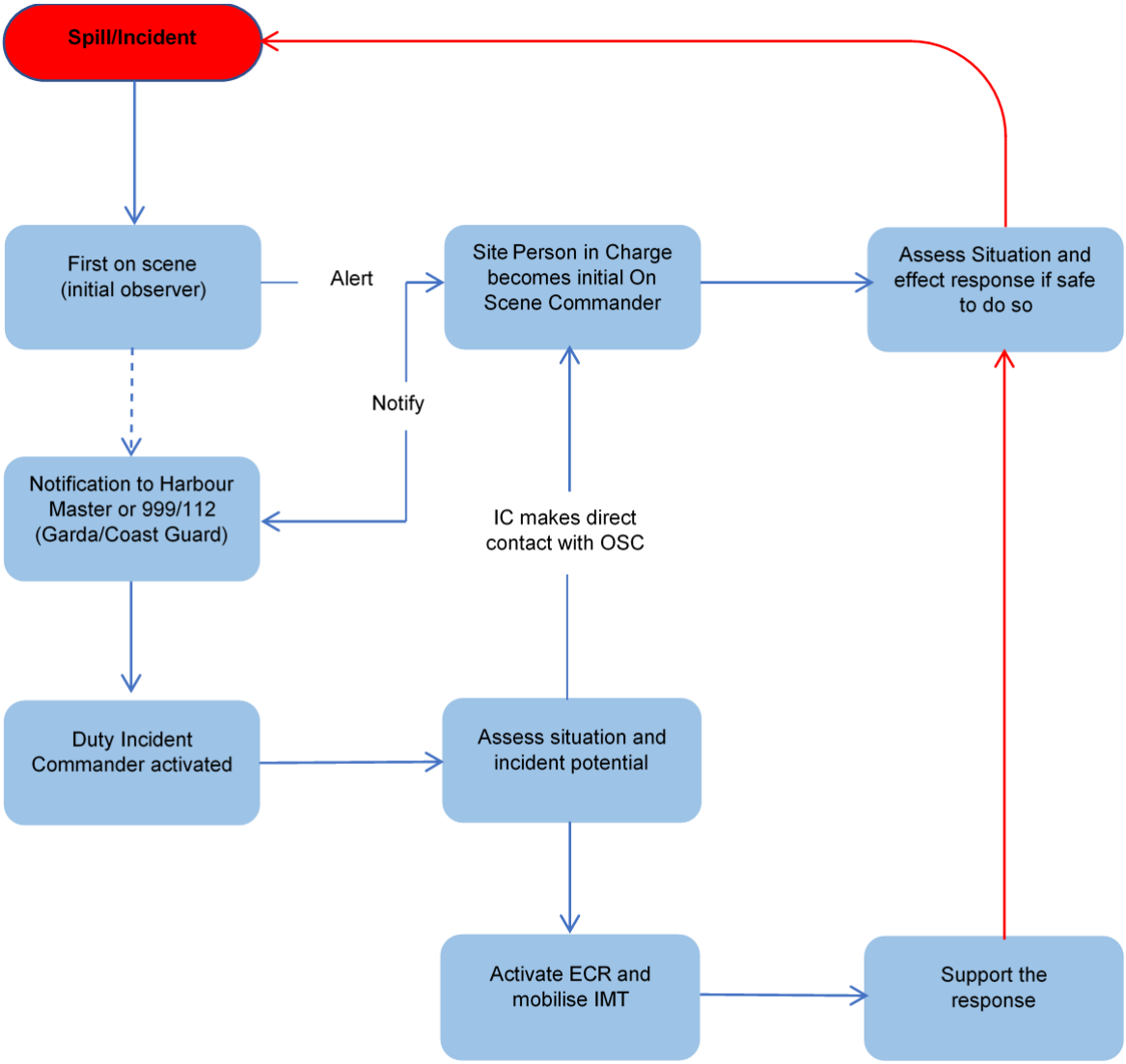
REVISION SHEET

Issue No: Copy No ……	**Received by:**	**Date:**
Distributed on ……		

AMENDMENTS:

Date	Section	Removed Pages	Inserted Pages	By	Date

TO ACTIVATE THIS PLAN CALL THE
DUTY HARBOUR MASTER
Daytime +353 6973103
Out-of-hours +353(0)87 2542266



Once activated go to Page 10 for further actions

THIS PLAN CONSIST OF THREE PARTS
AN OPERATION SECTION
A SET OF CHAPTERS
A SET OF ANNEXES

The Operations Section guides the overall response

The Chapters and Annexes contain supporting information that will assist with each stage of the response

IMPORTANT SUPPORTING DOCUMENTS

Shannon Foynes Port Company Major Emergency Plan
Shannon Foynes Port Company Marine Emergency Plan
National Contingency Plan for Oil Spill Response
Limerick County Council Contingency Plan
Clare County Council Contingency Plan
Kerry County Council Contingency Plan
Management of Major Emergencies – Protocol 7

Controlled Copy No: _____1_____

IRCG LETTER OF APPROVAL

An Roinn Iompair Turasóireachta agus Spóirt
Department of Transport, Tourism and Sport

Priomh Oifig
Lána Liosain, Baile Átha Cliath 2, Éire
Head Office
Leeson Lane, Dublin 2, Ireland
EIRCODE: D02 TR60
Lo-Call 0761-001 601 +353-1-670 7444
www.dttas.ie

06th March 2018

Mr. Hugh Conlon
Assistant Harbour Master
Shannon Foynes Port Company
Main Street
Ballynacragga
North Foynes
Co. Limerick

RE: Approval of Oil Spill / HNS Contingency Plan – Sea Pollution (Amendment) Act 1999 (as Amended)

Dear Hugh,

On behalf of the Minister for Transport, Tourism and Sport, the Irish Coast Guard hereby approves the Shannon Foynes Port Company Oil and Hazardous Noxious Substances Spill Contingency Plan.

This Plan is valid for a period of 3 years from the date of this approval letter.

Please submit an updated Plan before the date of expiry for the existing Plan has passed.

For and on behalf of the Minister for Transport, Tourism and Sport.

Chris O'Donohoe
Maritime Services Division

06th March 2018

TABLE OF CONTENTS

INTRODUCTION

Purpose of the Plan
Objectives
Scope – Area of Responsibility

STANDARD OPERATING PROCEDURES

Phase 1 – Discovery and Notification, Evaluation, Identification and Activation

- Discovery and Notification of a marine oil spill
- Evaluation and Identification of marine spill incident
- Actions of Duty Harbour Master
    - No response required
    - No immediate response required – standby mode
    - Response required
- Declaration of Tiered Response – Tier 1, Tier 2, Tier 3
- Incident Notification and Response Process
- Tier Escalation Matrix
- Tier 2 Response Activations
- Incident Command – Incident Management Team and Emergency Control Room

Phase 2 - Development of an Action Plan

- Response Priorities, Strategy and Methodology
- Incident Action Plan
- Incident Objectives
- Incident Action Plan Development
- Incident Action Plan Approval

Phase 3 – Action Plan Implementation

- Incident Plan Hierarchy
- Planning Cycle
- Command Structure
- Health and Safety
- Sampling and Evidential Collection
- Stakeholder Engagement and Media Response
- Documentation
- Cost Recovery

Phase 4 – Response Termination and Demobilisation

- Response Termination – criteria and approval
- Debriefing – capturing and recording lessons learned
- Stakeholder Engagement and Community Liaison

Phase 5 – Post Operations – Documentation of Costs/Litigation

- Policy
- Financial system
- Legal advice and considerations

APPENDICES

Chapter 1	Definitions and Abbreviations
Chapter 2	Forms for the notification of Marine Oil Spills to Irish Coast Guard
Chapter 3	Incident Command Structure Roles and Responsibilities
Chapter 4	Risk Assessment
Chapter 5	Shoreline Clean-Up Assessment Technique (SCAT)
Chapter 6	Response Strategies and Guidance
Chapter 7	Hazardous and Noxious Substances - Response Guidance
Chapter 8	Dispersant Use
Chapter 9	Occupational Safety and Health
Chapter 10	Wildlife Rescue and Rehabilitation
Chapter 11	Evidence Collection and Cost Recovery
Chapter 12	Waste Management
Chapter 13	Place of Refuge
Chapter 14	Stakeholder Engagement and Media Protocols
Chapter 15	Financial Management Protocols (not required in this plan)
Chapter 16	Documentation Procedures (not required in this plan)

ANNEXES

Annex 1	Telephone Contact List
Annex 2	Equipment and Resources
Annex 3	Communication Equipment and Protocols
Annex 4	Service Contracts and MoUs
Annex 5	Incident Command Forms
Annex 6	ASA OILMAP Operating Instructions

INTRODUCTION

The Shannon Foynes Port Company (SFPC) has a moral, legal and business obligation to provide a process, procedures and resources to respond to oil spill incidents within its area of operational responsibility. Accordingly, this plan describes the graduated and *Tiered* response process developed to fulfil these obligations and to provide a robust and coordinated response to oil spill incidents. The plan takes full account of requirements made within the National Framework for the Management of Major Emergencies and the National Contingency Plan for Oil Spills.

Purpose of Plan

This plan details how SFPC together with members of the Shannon Estuary Anti-Pollution Team (SEA-PT) will respond to a Tier 2 oil spill within its area of responsibility. The primary purpose of this plan is to set in motion the necessary actions to stop or minimise such a spill and to mitigate its effects

As part of this Tier 2 Plan, reference should be made to the Tier 1 plans of individual SEA-PT members, organizations and companies.

In the event of a Tier 3 response within the Shannon Estuary, this plan will provide the Irish Coast Guard and other National Authorities with specific regional information to assist in responding effectively to the spill.

Objectives:

This plan guides the Incident Commander and other involved personnel through the decisions which will be required during an incident response.

The primary objectives of this plan are:

- To prevent further pollution/damage caused by the spill
- To contain and clean up a marine spill
- Cause no further damage to the marine environment, or create unacceptable risk to those responding to or impacted by the incident

Specific objectives are to:

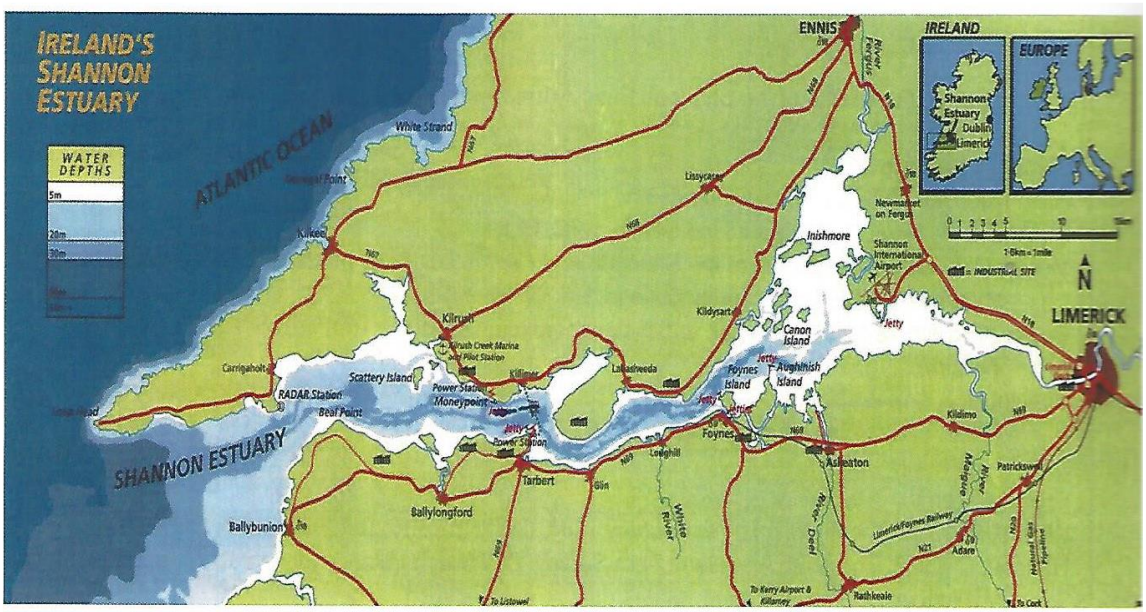
- Mobilize appropriate personnel, equipment and other resources
- Make all necessary notifications to relevant authorities and agencies
- Instigate appropriate containment, recovery and clean-up operations to control and mitigate the effects of the spill and contribute to the restoration of the environment
- Initiate, as appropriate, wildlife rescue and rehabilitation operations
- Gather evidence throughout the operation for possible legal action
- Maintain accurate records so that the cost of the response operation may be accurately assessed

The health and safety of all personnel involved or affected by the spill incident must take the highest priority.

Scope of Plan – Area of Responsibility

SFPC together with SEA-PT are responsible for initial Tier 2 spill response management within the Shannon Estuary from Limerick City to the mouth of the Shannon Estuary at a notional line from Loop Head, County Clare to Kerry Head, County Kerry.

SFPC and SEA-PT members are involved in commercial and industrial operations on both side of the Estuary and each has an obligation to develop and maintain emergency response plans appropriate to Tier 1 response.



Map 1. Shannon Estuary

STANDARD OPERATING PROCEDURES- DISCOVERY, NOTIFICATION, EVALUATION, IDENTIFICATION, ACTIVATION

PHASE 1 – DISCOVERY AND NOTIFICATION

Discovery and notification of a marine oil spill incident:

An oil spill may be discovered and reported through any number of sources: the spiller, a member of the public or other 3rd party, emergency services or the Coast Guard.

On receipt of initial notification, the following information should be obtained as a minimum:

- Location and type of pollution incident
- Type of oil
- Extent of spill – area of coverage
- Time of incident
- Potential hazardous circumstances – i.e. large release of light ends
- Any other relevant data

A Pollution Incident Form should also be completed – see Chapter 2.

An oil spill report will require follow-up action to be taken in accordance with this plan.

All reports of oil spills within the Shannon Estuary must be notified to:

- SFPC Duty Harbour Master – (Day) +353 6973103
  (Out-of-Hours) + 353 (0)87 2542266
- Irish Coast Guard – 999/112 (Ask for Coast Guard) or 01 6620922
- Appropriate Local Authority:

Limerick County Council	– Paul O'Grady	061 496000 or 087 9115000
Clare County Council	– John Leahy	065 6846425 or 087 1245835
Kerry County Council	– Mike Boyce	066 7121111 or 087 9878198

Evaluation and identification of a marine oil spill incident:

On receiving a report of an oil spill the receiving officer shall:

- Complete as much detail on the Pollution Incident Evaluation Form (Chapter 2) as possible
- Investigate or arrange for an investigation to be immediately carried out in order to confirm the details of the report

- Ensure that above notifications have been made as appropriate

The Pollution Incident Evaluation Form may be used as evidence in any legal proceedings against the spiller as well as being of assistance with respect to the response, therefore as much detail should be obtained during the initial report.

Actions of Duty Harbour Master:

Once informed the Duty Harbour Master will assess the information provided and decide upon the appropriate course of action which may include:

No response required

Upon investigation and clarification of the initial report it may be clear that no response action is required.

In this case the Irish Coast Guard and appropriate Local Authority shall be notified and the incident closed.

No immediate response required - standby mode:

If no immediate response is required (e.g. because oil is heading offshore/nominal spill), the Duty Harbour Master will assess the situation and where necessary:

- Place the Incident Management Team on "standby" mode
- Establish monitoring of the slick and likely fate of the oil
- Be prepared to declare a response
- Advise stakeholders as required

Response required:

Should the Duty Harbour Master decide that a response is required he will:

- Determine the level of response required - Tier1 (Installation/spiller response) Tier 2 (SFPC - SEA-PT response), Tier 3 (National response coordinated by Coast Guard)

- Activate SFPC Incident Management Team in accordance with Shannon Foynes Port Company Major Emergency Plan
- Advise Coast Guard and appropriate Local Authority of response criteria and request assistance as required by the relevant Tier.
- Initiate initial response
- Advise stakeholders as required

The Harbour Master is responsible for the safety of navigation within the Harbour Authority defined areas of jurisdiction. In addition to mobilizing the SFPC IMT, the Duty Harbour Master should give early consideration to:

- Prohibiting or limiting movement of vessels within the affected area.
- Suspending Port operations

Declaration of Tiered Response – TIER 1, TIER 2, TIER 3

Tier Definition:

- **TIER 1** - A tier 1 incident is one in which a small spill can be dealt with by personnel in the immediate vicinity and has no external impact. Each installation in the area of the plan has enough equipment to respond to a **Tier 1** incident
- **TIER 2** - A tier 2 incident is one which will require the combined resources of the organisations represented on the Shannon Estuary Anti-Pollution Team. It will also require the involvement of regulatory bodies, local authorities, advisors and advisory bodies. In general, all spills in the Shannon Estuary, other than minor ones, will require a Tier 2 response
- **TIER 3** - A Tier 3 incident is a major oil pollution event with potential for environmental, social and economic impacts and which is beyond that capability of local resources. It will require local, national and probably international resources.

Tier 1 Response:

In the event of a Tier 1 being activated, the spiller or installation personnel will respond in accordance with their local procedures.

The Duty Harbour Master will monitor the response to ensure;

- The response is adequate
- That if the situation deteriorates, appropriate additional support is provided
- The incident is properly managed
- All notifications and reports are made

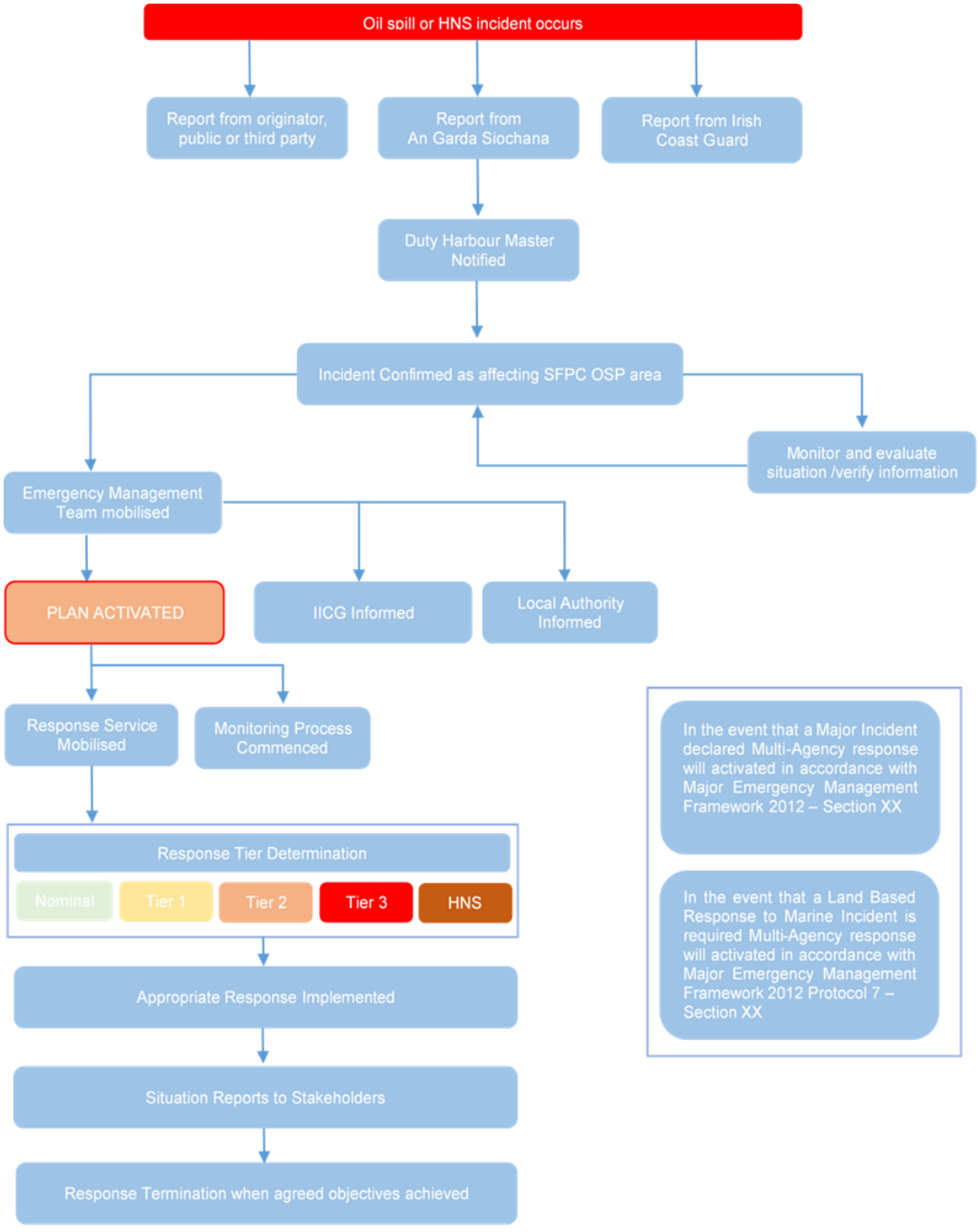
Tier 2 Response:

A Tier 2 response will require the activation of the SFPC Incident Management Team, and the SEA-PT. This will instigate notifications to Coast Guard and Local Authorities and Tier 2 response specialists.

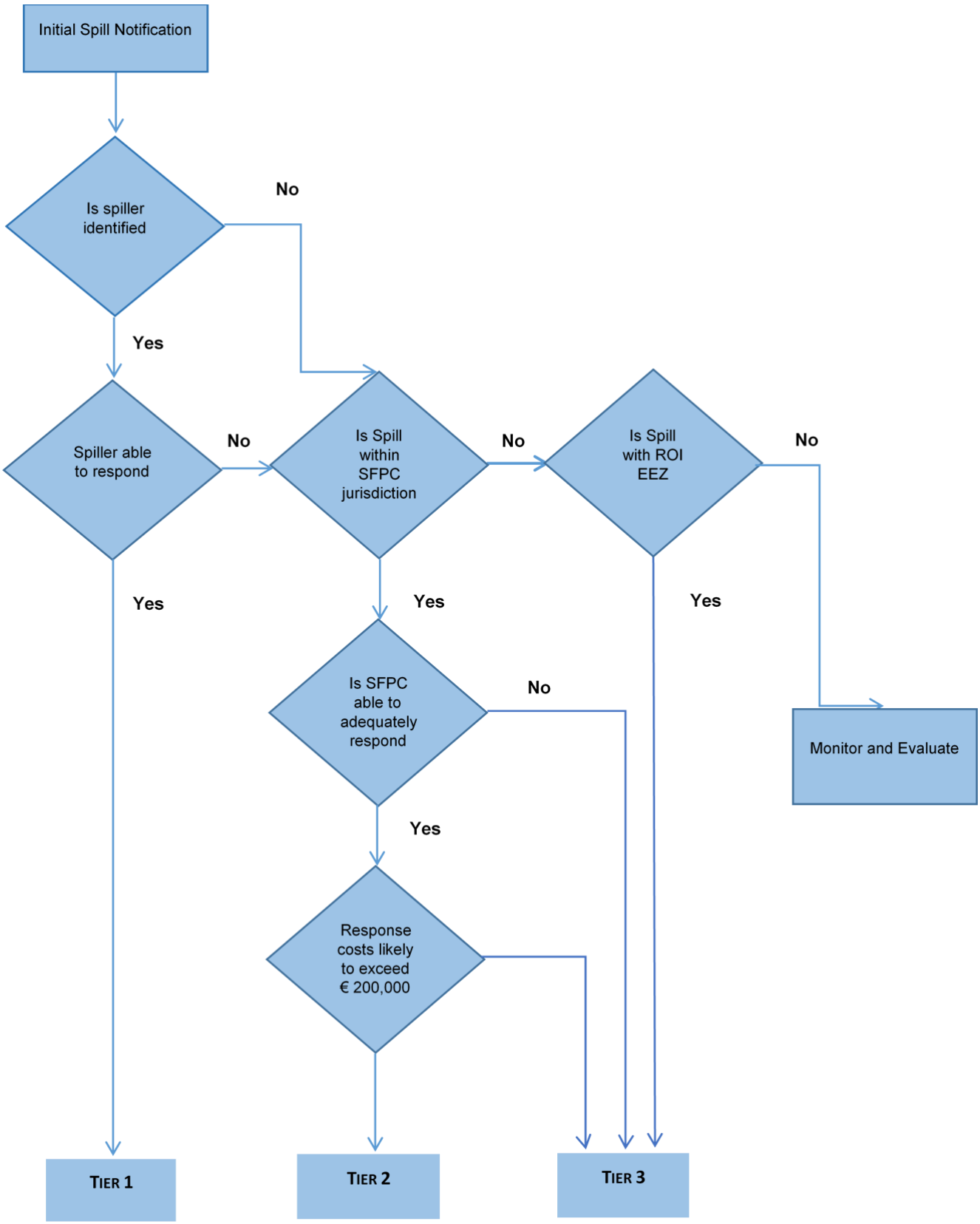
Tier 3 Response:

A Tier 3 response is initiated by contacting the Coast Guard. A response at this level will be coordinated under the National Contingency Plan and within the Management of Major Emergencies Framework.

INCIDENT NOTIFICATION AND RESPONSE PROCESS

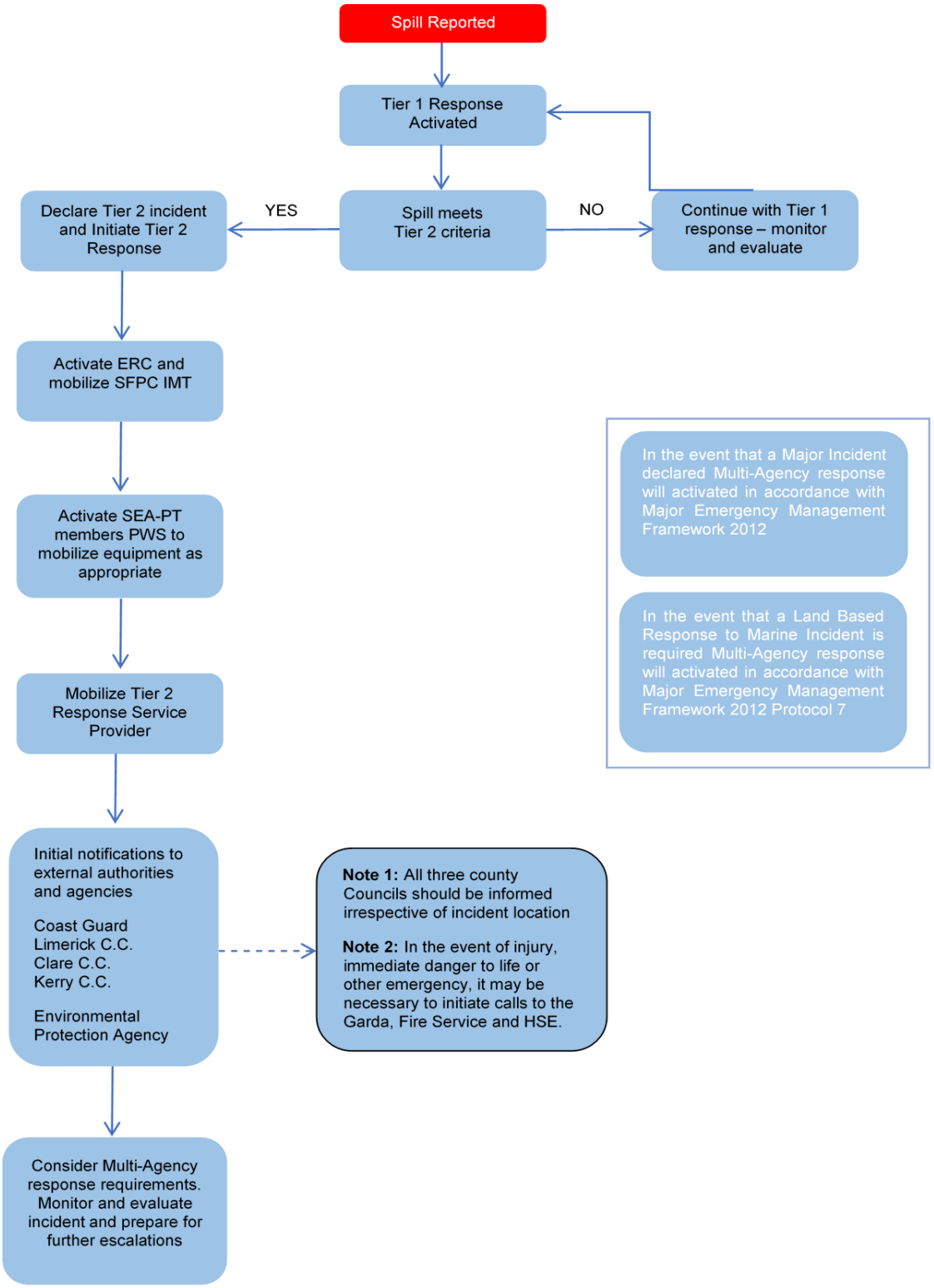


TIER ESCALATION MATRIX:

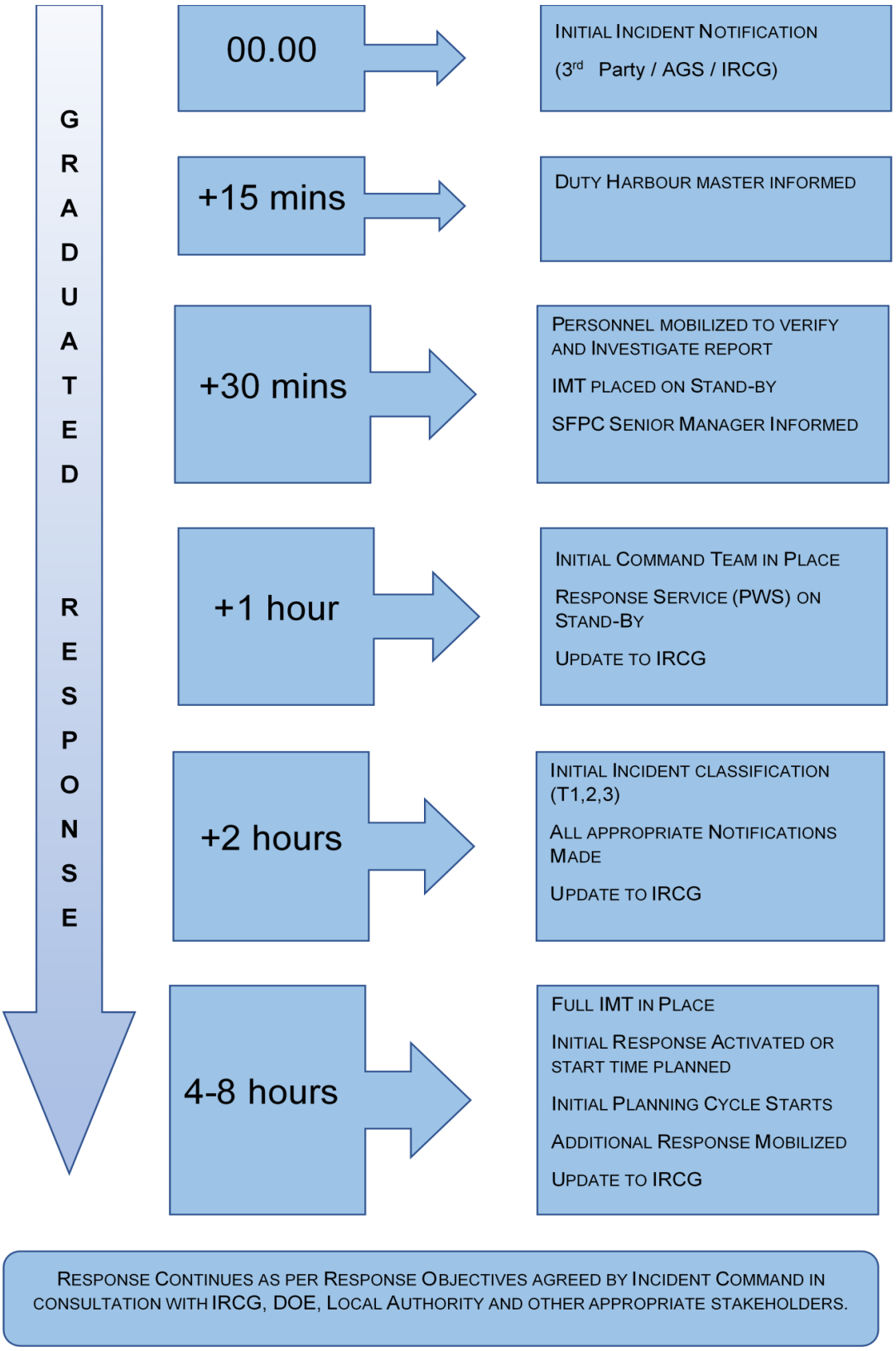


TIER 2 RESPONSE ACTIVATION:

To activate a Tier 2 response, the Duty Harbour Master must activate the SFPC IMT and SEA-PT members in addition to key external authorities and agencies as follows:



INCIDENT RESPONSE AND MOBILIZATION TIMELINE:



RESPONSE CONTINUES AS PER RESPONSE OBJECTIVES AGREED BY INCIDENT COMMAND IN CONSULTATION WITH IRCG, DOE, LOCAL AUTHORITY AND OTHER APPROPRIATE STAKEHOLDERS.

INCIDENT MANAGEMENT TEAM (IMT) AND EMERGENCY CONTROL ROOM (ECR):

In the initial stages of the oil spill response the IMT will work out of the ECR located in the SFPC offices in Foynes Harbour. The On-Scene, or Forward Control, is likely to be established in one of the responder's vehicles, a local site office or other appropriate building with communications established by mobile telephone and or VHF radio.

Should a multi-agency approach be adopted or Major Incident declared, the Coast Guard, in consultation with the IMT and local authorities, may decide to open a ECR at another location or in one of the County Council Regional Co-ordination Centres.

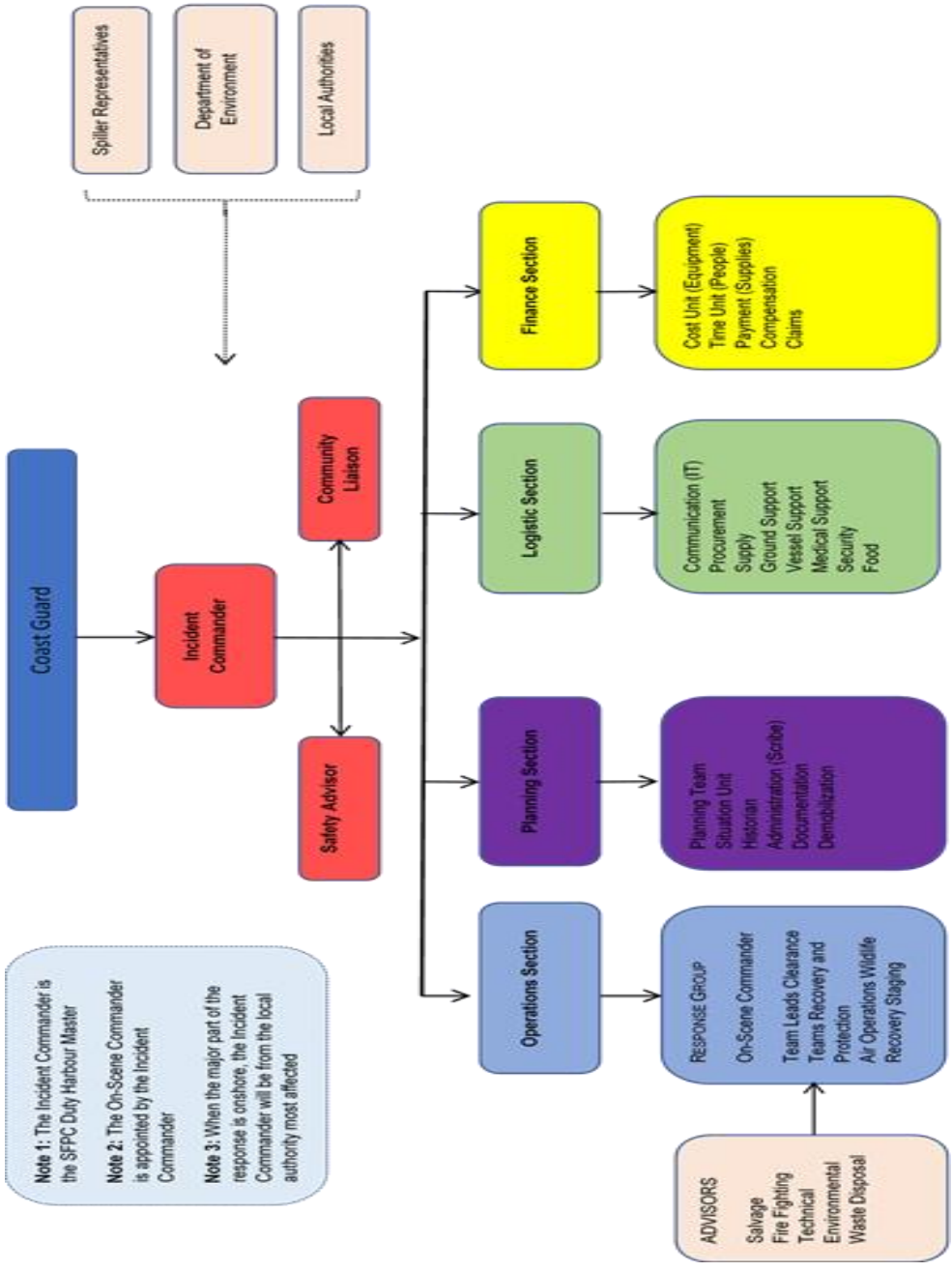
The general Incident Management Structure for a Tier 2 response is shown on page 17.

During a large Tier 2 spill, most positions in the IMT will be filled by a number of persons in order to ensure coverage over a 24-hour period and multiple days. The Incident Commander is accountable for ensuring that the response organization is fully staffed taking into account health and safety of personnel, knowledge and experience and operational effectiveness. Individual section leads shall be responsible for the staffing of their sections.

KEY REFERENCE SECTIONS:

Chapter 3 – Incident Command Team Roles and Responsibilities
Annex 2 – Equipment and Resources
Annex 3 – Personnel list and mobilization details

TIER 2 – INCIDENT MANAGEMENT TEAM STRUCTURE:



PHASE 2 - DEVELOPMENT OF AN INCIDENT ACTION PLAN

Response Priorities

Response operations will be undertaken following a hierarchy that puts a precedence on the health, safety and welfare of responders and others that may be affected by the spill or incident. The second priority is protecting the environment and implementing actions that will facilitate remediation and recovery, followed by protecting any assets involved or affected. The fourth priority is protecting the reputation of the organizations involved. The mnemonic PEAR is adopted by way of aide-memoire:

- PEOPLE
- ENVIRONMENT
- ASSETS
- REPUTATION

When setting initial Incident Objectives, the Incident Commander should take into consideration both the meaning and intent of these priorities.

At the first notification of an incident a guiding principle of 'prudent overreaction' should be adopted. This allows for early escalation of a response and helps to protect the IMT from being overwhelmed or caught out in the early stages of a response and as the incident progresses.

- **O**ver-react — Over-reaction means we call for support earlier and ready resources quicker
- **A**ssess — Start the physical response with a formal assessment. In addition to confirming incident facts it also allows us to define project needs.

▪ **R**espond	Undertake, manage and continuously review response. Maintaining our PEAR response priorities
▪ **S**tand Down	Objectives set by the IMT direct the conscious stand-down when the response is no longer beneficial or our objectives have been met.

Incident Action Plan

The Incident Action Plan (IAP) is a formal and approved document that sets out clear objectives and strategy for spill response which is then converted into an operational, tactical plan/response by the Incident Management Team.

Each spill event requires a specific Incident Action Plan (IAP) tailored to the incident. The incident action planning process requires collaboration and participation among all incident management leaders and their staffs.

Most oil spill incidents follow two distinct stages;

Stage 1 – Reactive: during this period events can move quickly as new information appears, incident teams are mobilised and response efforts commence. Decisions may be taken quickly and are often verbal.

Stage 2 – Proactive: during this period the incident has moved into 'project' stage. Personnel and resources are in place. The response and clean-up phase may last weeks or months.

The incident action planning process is built on the following phases:

i. Understand the situation
ii. Establish incident objectives
iii. Develop the plan
iv. Prepare and disseminate the plan
v. Execute, evaluate, and revise the plan

The product of this process, a well-conceived and complete IAP, facilitates successful incident response operations and provides a basis for evaluating performance in achieving incident objectives. The IAP identifies incident objectives and provides essential information regarding incident organization, resource allocation, work assignments, safety, and weather.

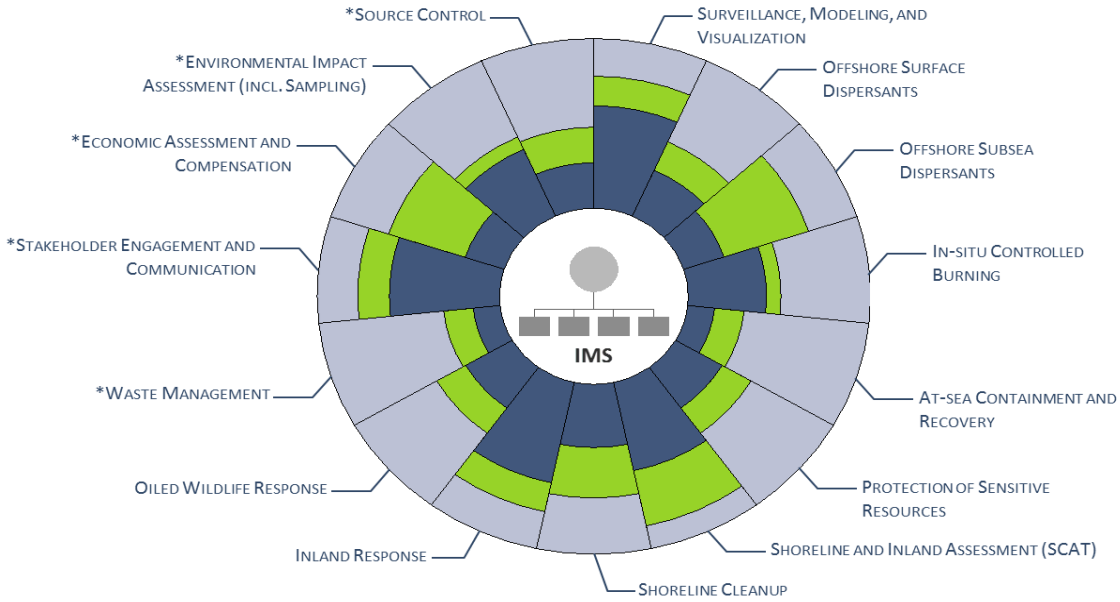
Incident Objectives

Incident Aims and Objectives drive the incident organization as it conducts response, recovery, and mitigation activities. Incident Objectives are set by the Incident Commander (IC) in consultation with Operations, Planning and Technical Advisors from appropriate authorities and agencies. The IC will take full cognisance of Response Priorities

IAP Development

The Planning Section creates the IAP for execution by the Operations Section. The plan takes account of the Incident Aims and Objectives, turning these into discrete tactics and work tasks.

When developing a response capability/strategy the following 15 elements should be considered.

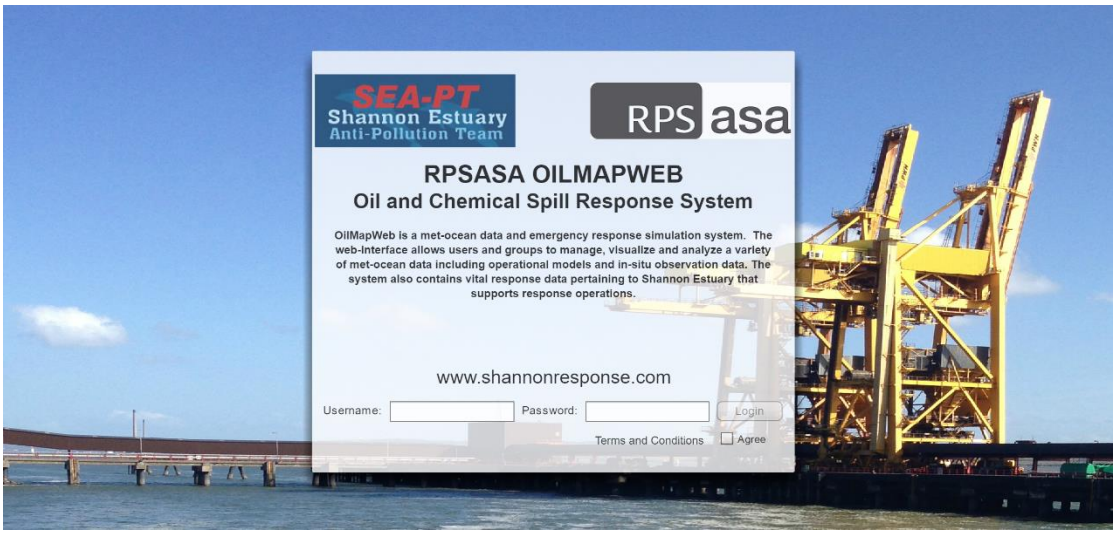


Ref: IPIECA – different colours represent response levels Blue T1, Green T2, Grey T3. This is example only. Planning team will assess during plan development.

The development of the IAP must include an assessment of the appropriateness of any current spill response plan implemented at the Tier 1/Tier 2 level, considering the stage of the incident. Standard IAP template can be found in Chapter 17.

SEA-PT utilize the Web-Based ASAScience OILMAP. OILMAP is an oil spill response and contingency planning tool that facilitates the management of spill response through risk and impact assessment, pre-planning, trajectory and fate model-

ling and data collation and retention. With integrated GIS it provides real time met-ocean and a comprehensive oil database with complete oil properties information.



SEA-PT have incorporated significant pre-plans, environmental and other data and information into OILMAP which should be used extensively by the IMT and Planning Team in the development of the IAP.

Information on the use of OILMAP can be found in Annex 8.

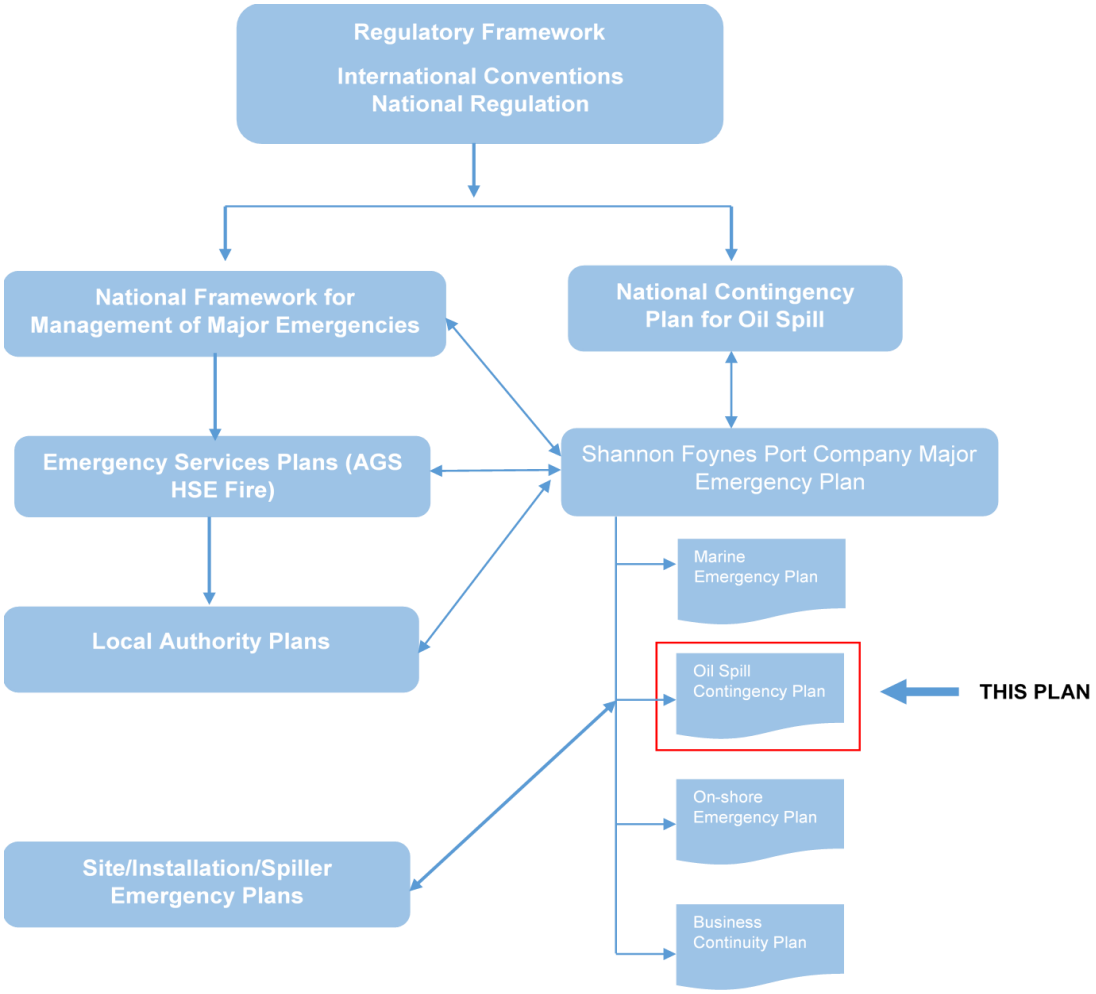
IAP Approval

The completed IAP is presented to the Incident Commander for approval. Additional approvals may be required from the Irish Coast Guard with concurrence from other agencies such as local authority and Environmental Protection Agency.

Incident Plan Hierarchy

This Oil Spill Contingency Plan forms part of a hierarchy of plans developed within the National Regulatory Framework and International Conventions and maintained within SFPC, SEA-PT members, emergency services and other National and Local Government Agencies and Departments.

In the event of an oil spill, the activation of any of these plans would necessitate the activation of this plan

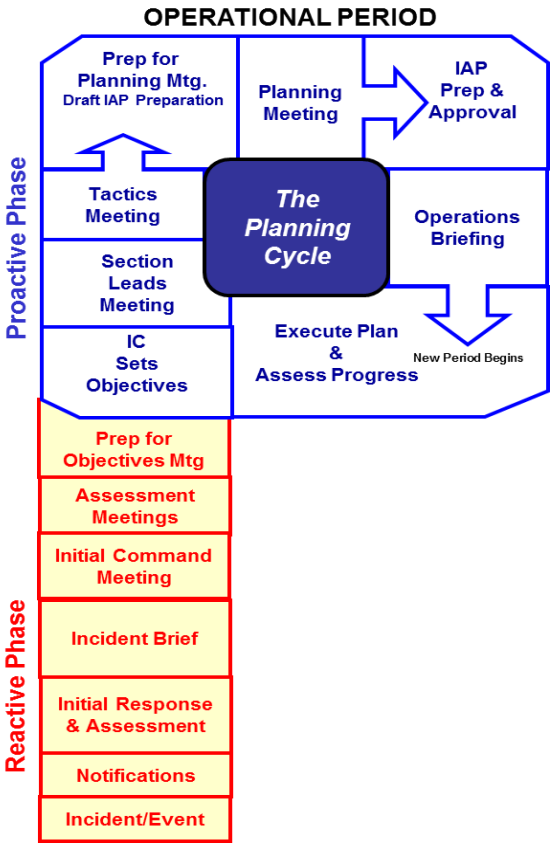


Planning Cycle

The Incident Command Team is accountable for the effective implementation of the IAP. The implementation process following a *Plan – Do – Check – Act* cycle within the Incident Command Structure.

As discussed above, the typical response to an oil spill falls into phases – Reactive Phase and Pro-Active Phase. Response during both periods is managed through the application of the 'Planning Cycle'. The Planning Cycle is a step-by-step process through which the Incident Commander and IMT can develop and implement an IAP in response to and in anticipation of developing events. The Planning Cycle is shown graphically as a "**P**".

The Planning "**P**" is a guide to the process and steps involved in planning for an incident.



The top of the leg of the "**P**" depicts the operational planning cycle. In this circular sequence, a series of pre-set meetings drive the response and execution of the IAP.

The leg of the "**P**" describes the initial response period:

Once the incident/event begins, initial steps include IMT mobilization early notifications, Initial Response & Assessment, Incident Briefing

Planning begins with a thorough assessment that provides information needed to make initial management decisions – following the principle of *prudent over-reaction*.

Command Structure

The Incident Command structure needs to be flexible to take account of the early dynamic nature of spill response and the longer-term project nature of prolonged incidents.

There are FIVE main management sections:

- Command
- Operations
- Planning
- Logistics
- Finance

Through the pro-active mobilization and population of these sections, the response structure can be created to manage the most complex of spill events.

The initial response organization is shown on page 17.

Guidance on the larger response organization, including full Roles and Responsibilities is found in Chapter 3.

Health and Safety

Following the Response Priorities PEAR, the health and safety of responders and others who may be affected by the spill must take the highest priority. All Health and Safety requirements MUST be incorporated into spill response operations and action.

Sampling and Evidential Collection

Full and accurate documentation of all response actions and associated costs is also a critical component of this process.

Chapter 11 - Evidence Collection sets out details for obtaining samples and gathering information to enable a successful prosecution and/or civil action to be taken.

Stakeholder Engagement and Media Response

Stakeholder Engagement and Media Management are an important set of activities that can build a bridge between key stakeholders (particularly the local community) affected by a spill and the response organization. It is a mechanism that facilitates the response organization and stakeholders to identify, assess and respond to concerns about issues that affect both the stakeholder and the response effort.

The focus of engagement falls into three broad areas:

1) Helping develop the response strategy by identifying and understanding concerns before they occur

2) Addressing issues identified or raised by stakeholders

3) Effective and pro-active communication

Stakeholder Engagement and Media Management guidance may be found in Chapter 14.

Documentation

Full and accurate documentation of all response actions is a critical component of the response process and may form part of future investigations and potential legal actions. Records of all communications (telephone conversations, file note), and a chronological account of the incident must be kept.

Guidance and instruction on Document Management may be found in relevant SFPC documents.

Cost Recovery

SFPC and SEA-PT respond to incidents based on the principle that the Polluter Pays. To facilitate cost recovery, it is necessary to capture, track and record all cost and financial transactions.

It necessary to work within a financial management and account process that is transparent, in keeping with good practice (including delegated authorization for expenditure) and auditable.

Guidance on financial management protocols may be found in relevant SFPC documents.

PHASE 4 – RESPONSE TERMINATION AND DEMOBILISATION

Response Termination

The Incident Commander, in consultation with the Irish Coast Guard, Local Authority and other appropriate Government agencies may terminate a response once Incident Objectives have been achieved and the incident response has been adequately completed.

It should be borne-in-mind that the incident response may be terminated, notwithstanding that remediation work may be on-going. Such a decision may be contentious and therefore all responding parties should be aligned on the rationale for standing-down the response.

Response termination involves the recovery, cleaning and maintenance of all equipment used during the response as well as the demobilisation of all personnel involved in the response and replacement of all consumables. It also involves the collation and completion of all documentation associated with the spill response, including expenditure reports.

Debriefing

A thorough debriefing of all key personnel involved in the response will be held. This will enable a review of the formal plans, response strategies and overall management of the response so that lessons can be learnt and improvements made.

PHASE 5 – POST OPERATIONS – DOCUMENTATION OF COSTS AND LITIGATION

Policy

It is the Policy of SPFC and SEA-PT to recover costs of oil pollution clean-up operations from the spiller.

Financial system

The arrangements for the control of expenditure, cost recovery and financial authority limits are contained in SFPC financial protocols.

It should be noted that costs will most likely continue to be incurred for some time after the termination of the response and clean-up phase of an incident. It will therefore be necessary to ensure a method for collating and accruing such additional costs.

Legal advice and considerations

Most oil spill events culminate in actions by various parties to seek cost recovery, compensation or other forms of legal action, both criminal and civil. The response must also be conducted within the legal framework concerning environmental protection, health and safety and waste disposal. It is therefore necessary to seek early guidance from legal counsel and be mindful of legal requirements during the development and execution of response plans and activities.