

# Appendix AA. Oil Spill Response Plan (OSRP)

**Document Revision** 

Α

**Issue Date** 

February 2021



# MAYFLOWER WIND

Prepared for: Mayflower Wind Energy LLC

# Draft Oil Spill Response Plan (OSRP)

Prepared by:

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February 2021



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#### **Quality information**

Prepared by	Approved by
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ESA Certified Ecologist	Mayflower Wind Project Manger

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# MAYFLOWER WIND ENERGY LLC

# DRAFT Oil Spill Response Plan (OSRP)

**Revision 0** 

February, 2021

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# **Response Plan Cover Sheet**

Owner/operator of facilit	t <b>y:</b>	Mayflower V	Vind En	ergy LLC			
Facility name:		Mayflower V	Vind				
Facility mailing address	:	101 Federa	101 Federal Street, Suite 1900, Boston, MA 02210				
Facility phone number:		TBD					
Latitude:		N 40.74718	2	Longitude:		-70.416157	
Facility Type		Offshore wi	nd gene	ration			
SIC code:		4911					
Dun and Bradstreet num	nber:						
Largest aboveground oi capacity (gallons [gals])		150,000 (po	ower trar	nsformer)			
Maximum oil storage ca (gals):	pacity	160,000 (pe	er offsho	re substation pla	atform	[OSP])	
Number of aboveground storage tanks	l oil	17 (per OSF and diesel ta		es transformers,	shunt	reactors, day tank	ïS,
Worst case oil discharge (gals):	e amount	160,000					
Facility distance to navig water. Mark the appropr							
0-1/4 mile: X	1/4-1/2 mile	e:	1/2-1	mile		> 1 mile	
Applicability of Substan	tial Harm Crit	teria					
Does the facility transfer of and does the facility have greater than or equal to 42	a total oil stor		els	YES	x	NO	
Does the facility have a total oil storage capacity greater than or equal to one million gals and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?		e is	YES		NO	x	
Does the facility have a total oil storage capacity greater than or equal to one million gals and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?		ted at	YES		NO	x	
Does the facility have a total oil storage capacity greater than or equal to one million gals and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gals within the last five years?			YES		NO	x	

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# **OSRP** Revision History

Revision #	Revision date	Details	Authorized By Initials	Full Name	Position
0	2/12/21	Draft	NP	Nancy	
0		Dian		Palmstrom	Project Manager

# **OSRP 2-Year Full Review Log**

Full Review Date	Changes Required	Completed By Initials	Full Name	OSPD Notified

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# **OSRP** Distribution List

Name	Title	Association / Company Name
Jennifer Flood	Offshore Permitting Manager	Mayflower Wind Energy LLC
Susan Childs	Permitting Director	Mayflower Wind Energy LLC
Jan Duinhoven	OSP Package Lead	Mayflower Wind Energy LLC
Bill Follett	Engineering Director	Mayflower Wind Energy LLC
TBD	Qualified Individual	Mayflower Wind Energy LLC
TBD	Qualified Individual (alt)	Mayflower Wind Energy LLC
Daniel Cushman	HSSE Manager	Mayflower Wind Energy LLC

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# **Acronyms and Abbreviations**

ACP     Area Contingency Plan       BOEM     Bureau of Ocean Energy Management       BSEE     Bureau of Safety and Environmental Enforcement       CFR     Code of Federal Regulations       COP     Construction and Operations Plan       EPA     U.S. Environmental Protection Agency       ERT     Emergency Response Team       ESI     Environmental Sensitivity Index       °F     degrees Fahrenheit       FOSC     Federal On-Scene Coordinator       gal     gallon/gallons       HSSE     Health, Safety, Security and Environment       IAP     Incident Action Plan       IC     Incident Commande Post       ICS     Incident Command Post       ICS     Incident Command System       IMS     Incident Command System       IMT     Incident Management Team       IO     Information Officer       kg     kilogram       km     kilogram       km     kasoDEP       Massachusetts Department of Environmental Protection       Mayflower Wind     Mayflower Wind Energy LLC       MHz     megahertz       LO     Liaison Officer       m³     cubic meters       MassDEP     Massachusest Department of Environmental Protection       Mayflower Wind     Mayflower Wind Energy LLC	Abbreviation or Acronym	Definition
BSEE         Bureau of Safety and Environmental Enforcement           CFR         Code of Federal Regulations           COP         Construction and Operations Plan           EPA         U.S. Environmental Protection Agency           ERT         Emergency Response Team           ESI         Environmental Sensitivity Index           °F         degrees Fahrenheit           FOSC         Federal On-Scene Coordinator           gal         gallon/gallons           HSSE         Health, Safety, Security and Environment           IAP         Incident Action Plan           IC         Incident Commander           ICP         Incident Commander           ICS         Incident Management System           IMS         Incident Management Team           IO         Information Officer           kg         kilogram           km         kilogram           Km         Massachusetts Department of Environmental Protection           Mayflower Wind         Mayflower Wind Energy LLC           MHz         megahertz           LO         Liaison Officer           ms         National Response Center           NAT         National Response Center           NAT         National Response C	ACP	Area Contingency Plan
CFR         Code of Federal Regulations           COP         Construction and Operations Plan           EPA         U.S. Environmental Protection Agency           ERT         Emergency Response Team           SI         Environmental Sensitivity Index           °F         degrees Fahrenheit           FOSC         Federal On-Scene Coordinator           gal         gallon/gallons           HSSE         Health, Safety, Security and Environment           IAP         Incident Commander           IC         Incident Command Post           ICS         Incident Command System           IMS         Incident Management System           IMT         Incident Management Team           IO         Information Officer           kg         kilogram           km         kilogram           km         Kilometer           m³         cubic meters           MassaChusetts Department of Environmental Protection           Mayflower Wind         Mayflower Wind Energy LLC           MHz         megahentz           LO         Liaison Officer           nm         nautical mile/nautical miles           NMFS         National Marine Fisheries Service           NOAA	BOEM	Bureau of Ocean Energy Management
COP       Construction and Operations Plan         EPA       U.S. Environmental Protection Agency         ERT       Emergency Response Team         ESI       Environmental Sensitivity Index         °F       degrees Fahrenheit         FOSC       Federal On-Scene Coordinator         gal       gallon/gallons         HSSE       Health, Safety, Security and Environment         IAP       Incident Action Plan         IC       Incident Commander         ICP       Incident Command Post         ICS       Incident Management System         IMS       Incident Management Team         IO       Information Officer         kg       kilogram         km       kilometer         m³       cubic meters         MassDEP       Massachusetts Department of Environmental Protection         Mayflower Wind       Mayflower Wind Energy LLC         MHz       megahertz         LO       Liaison Officer         nm       nautical mile/nautical miles         NMFS       National Response Team         OC       Liaison Officer         nm       nautical mile/nautical miles         NMFS       National Response Team         OCS <td>BSEE</td> <td>Bureau of Safety and Environmental Enforcement</td>	BSEE	Bureau of Safety and Environmental Enforcement
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ERT       Emergency Response Team         ESI       Environmental Sensitivity Index         °F       degrees Fahrenheit         FOSC       Federal On-Scene Coordinator         gal       gallon/gallons         HSSE       Health, Safety, Security and Environment         IAP       Incident Action Plan         IC       Incident Commander         ICP       Incident Command Post         ICS       Incident Command System         IMS       Incident Management System         IMT       Incident Management Team         IO       Information Officer         kg       kilogram         km       kilometer         m³       cubic meters         MassDEP       Massachusetts Department of Environmental Protection         Mayflower Wind       Mayflower Wind Energy LLC         MHz       megahentz         LO       Liaison Officer         nm       nautical miles         NMFS       National Response Center         NRC       National Response Center         NRT       National Response Center         NRT       National Response Team         OCS       Outer Continental Shelf         OSP       Offshore Substat	СОР	Construction and Operations Plan
ESI       Environmental Sensitivity Index         °F       degrees Fahrenheit         FOSC       Federal On-Scene Coordinator         gal       gallon/gallons         HSSE       Heatth, Safety, Security and Environment         IAP       Incident Action Plan         IC       Incident Commander         ICP       Incident Command Post         ICS       Incident Command System         IMS       Incident Management System         IMT       Incident Management Team         IO       Information Officer         kg       kilogram         km       kilometer         m³       cubic meters         Massachusetts Department of Environmental Protection         Mayflower Wind       Mayflower Wind Energy LLC         MHz       megahertz         LO       Liaison Officer         nm       nautical miles         NMFS       National Marine Fisheries Service         NOAA       National Response Center         NRT       National Response Center         NRT       National Response Team         OCS       Outer Continental Shelf         OSHA       Occupational Safety and Health Administration         OSIC       On-Sc	EPA	U.S. Environmental Protection Agency
°F       degrees Fahrenheit         FOSC       Federal On-Scene Coordinator         gal       gallon/gallons         HSSE       Health, Safety, Security and Environment         IAP       Incident Action Plan         IC       Incident Commander         ICP       Incident Command Post         ICS       Incident Command Post         ICS       Incident Command Post         ICS       Incident Management System         IMT       Incident Management Team         IO       Information Officer         kg       kilogram         km       kilometer         m³       cubic meters         MassDEP       Massachusetts Department of Environmental Protection         Mayflower Wind       Mayflower Wind Energy LLC         MHz       megahertz         LO       Liaison Officer         nm       nautical mile/nautical miles         NMFS       National Marine Fisheries Service         NOAA       National Response Center         NRT       National Response Team         OCS       Outer Continental Shelf         OSHA       Occupational Safety and Health Administration         OSIC       On-Scene Incident Commander	ERT	Emergency Response Team
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ICPIncident Command PostICSIncident Command SystemIMSIncident Management SystemIMTIncident Management TeamIOInformation Officerkgkilogramkmkilometerm³cubic metersMassDEPMassachusetts Department of Environmental ProtectionMayflower WindMayflower Wind Energy LLCMHzmegahertzLOLiaison Officernmnautical mile/nautical milesNMFSNational Marine Fisheries ServiceNOAANational Response CenterNRTNational Response TeamOCSOuter Continental ShelfOSHAOccupational Safety and Health AdministrationOSPOffshore Substation PlatformOSPDOil Spill Preparedness DivisionOSRCOil Spill Response CoordinatorOSRPOil Spill Response Plan	IAP	Incident Action Plan
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LOLiaison Officernmnautical mile/nautical milesNMFSNational Marine Fisheries ServiceNOAANational Oceanic and Atmospheric AdministrationNRCNational Response CenterNRTNational Response TeamOCSOuter Continental ShelfOSHAOccupational Safety and Health AdministrationOSICOn-Scene Incident CommanderOSPOffshore Substation PlatformOSPDOil Spill Preparedness DivisionOSRCOil Spill Response OrganizationOSRPOil Spill Response Plan	Mayflower Wind	Mayflower Wind Energy LLC
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OCSOuter Continental ShelfOSHAOccupational Safety and Health AdministrationOSICOn-Scene Incident CommanderOSPOffshore Substation PlatformOSPDOil Spill Preparedness DivisionOSRCOil Spill Response CoordinatorOSROOil Spill Response OrganizationOSRPOil Spill Response Plan	NRC	National Response Center
OSHAOccupational Safety and Health AdministrationOSICOn-Scene Incident CommanderOSPOffshore Substation PlatformOSPDOil Spill Preparedness DivisionOSRCOil Spill Response CoordinatorOSROOil Spill Response OrganizationOSRPOil Spill Response Plan	NRT	National Response Team
OSIC     On-Scene Incident Commander       OSP     Offshore Substation Platform       OSPD     Oil Spill Preparedness Division       OSRC     Oil Spill Response Coordinator       OSRO     Oil Spill Response Organization       OSRP     Oil Spill Response Plan	OCS	Outer Continental Shelf
OSPOffshore Substation PlatformOSPDOil Spill Preparedness DivisionOSRCOil Spill Response CoordinatorOSROOil Spill Response OrganizationOSRPOil Spill Response Plan	OSHA	Occupational Safety and Health Administration
OSPDOil Spill Preparedness DivisionOSRCOil Spill Response CoordinatorOSROOil Spill Response OrganizationOSRPOil Spill Response Plan	OSIC	
OSRC     Oil Spill Response Coordinator       OSRO     Oil Spill Response Organization       OSRP     Oil Spill Response Plan	OSP	Offshore Substation Platform
OSRC       Oil Spill Response Coordinator         OSRO       Oil Spill Response Organization         OSRP       Oil Spill Response Plan	OSPD	Oil Spill Preparedness Division
OSRO     Oil Spill Response Organization       OSRP     Oil Spill Response Plan	OSRC	
OSRP Oil Spill Response Plan	OSRO	
	OSRP	
	psi	

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QI	Qualified Individual	
RI & SEM ACP	Rhode Island and Southeastern Massachusetts Area Contingency Plan	
SCSC	Source Control Support Coordinator	
SPCC	Spill Prevention, Control, and Countermeasure	
SROC	Spill Response Operations Center	
UC	Unified Command	
UHF	ultrahigh frequency	
USC	United States Code	
USCG	United States Coast Guard	
USFWS	United States Fish and Wildlife Service	
VHF-FM	very high frequency - frequency modulation	
WTG	Wind Turbine Generator	

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In case of an uncontrolled release/spill of oil onto the ground or surface water, contact the following after initial control measures have been implemented (stop source, deployment of containment, or absorbent materials).

- Operations Base ......TBD (24 hour number)
- Oil Spill Response Organization (TBD).....TBD

# **OSRP Emergency Response – Quick Guide**

Pages vii through xii provide an Emergency Response Quick Guide to aid in response to incidents. This is intended as a quick reference and does not replace the details provided in the balance of this OSRP. The contents of the Quick Guide are as follows:

- Page vii Figure QG-1 a flow charge illustrating first response actions in the event of a spill.
- Page viii Immediate Actions a list of immediate actions after a release is first discovered.
- Page ix Incident Assessment Checklist a checklist to aid in tracking response actions as they are completed.
- Page xi Figure QG-2 a flow chart of response actions and notifications beginning with initial discover
- Page xii Figure QG-3- a decision tree for spill occurring in or expected to reach surface water

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#### Figure QG-1. First Response Actions in the Event of a Spill

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### **Immediate Actions**

In case of an uncontrolled release of oil onto the ground or into surface water, the initial control measures listed below are to be implemented.

#### Immediate steps to be taken by the Spill Observer/ First Responder include the following:

- 1. Make an immediate assessment of the incident; and call for medical assistance if an injury has occurred.
- 2. Stop the discharge (e.g., act quickly to secure pumps). If the incident is clearly the result of an operation that the Spill Observer/ First Responder can control safely, take immediate steps to correct the operation.
- 3. Take any steps deemed necessary to minimize any threat to public health and safety and to reduce the impact severity of the incident, if safe to do so.
  - Until confirmed otherwise, the impacted spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and the area has been tested.
  - If the First Responder does not have information and resources to make the determination as to the characteristics of the spilled material, an immediate request for assistance should be made.
- 4. Warn affected area personnel.
- 5. Notify the On-Duty Operations Supervisor, who will then function as the On-Scene Incident Commander (OSIC) pending arrival of Qualified Individual (QI).
- 6. With support from area operations personnel:
  - a. Activate facility alarms;
  - b. Evacuate non-essential personnel (if appropriate);
  - c. Shut off or disable ignition sources (as appropriate), including those designated as such: motors, electrical circuits, open flames, etc.; and
  - d. Isolate the area and initiate spill containment.

#### Immediate steps to be taken by the On-Duty Operations Supervisor include:

- 1. Assume the position of OSIC pending arrival of the QI.
- 2. Evaluate the incident assessment information given by the First Responder in accordance with Table QG-1.
- 3. Verify that medical assistance has been requested if an injury is reported.
- 4. Activate the Emergency Response Team (ERT).
- 5. Activate the Spill Response Contractor(s), if required.
- 6. Notify the Base Facility Control Room (see Table QG-1). Give spill incident status and request assistance and resources as required.
- Proceed to the spill location to supervise spill containment and clean-up measures. Flowcharts (Figure QG-2 and Figure QG-3) may aid the OSIC/QI in determining the appropriate spill response actions.

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#### Table QG-1. Incident Assessment Checklist

INCIDENT ASSESSMENT CHECKLIST
Status of all personnel confirmed as safe
Possible health or fire hazards identified and communicated
Time of the spill
Type of material spilled & estimated of amount of material spilled
Cause of the spill and whether the source is controlled or continuing
Location of the oil filled equipment, reservoir or container involved
Whether the oil spill is contained or not
The status of response operations, including any injured persons
On scene weather and environmental conditions (e.g., wind, sea, precipitation)
An initial assessment of whether the spilled oil can be contained and cleaned up with onsite resources, or whether additional resources are required

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#### Figure QG-2. Flow Chart of Initial Discovery, Notification, and Response

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#### Figure QG-3. Decision Tree for Spill Occurring in or Expected to Reach Surface Water

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# **Cross Reference Table (30 CFR 254)**

Cross Reference to Bureau of Safety and Environmental Enforcement Plan requirements (30 CFR 254 Subpart B. Oil-Spill Response Plans for Outer Continental Shelf Facilities)

Oil Spill Response	Plans for Outer Continental Shelf Facilities 30 CFR 254, Subpart B	OSRP Reference
254.21(b)(1)	Table of Contents	Table of Contents
254.21(b)(2)	Emergency response action plan	OSRP Emergency response – Quick Guide (Page vii)
254.21(b)(3)(i)	Equipment response inventory	Attachment 7
254.21(b)(3)(ii)	Contractual agreements	Attachment 2
254.21(b)(3)(iii)	Worst case discharge scenario	Table 8-3
254.21(b)(3)(iv)	Dispersant use plan	Section 10.4.3
254.21(b)(3)(vi)	In situ burning plan	Section 10.4.3
254.21(b)(3)(vi)	Training and drills	Attachment 8
254.22(a)	Facility location and type	Response Plan Cover Sheet
254.22(b)	Table of Contents	Table of Contents
254.22(c)	Record of changes	OSRP Revision History
254.22(d)	Cross reference table	This Table
254.23(a)	Designation of QI	Section 5.1.1
254.23(b)	Designation of spill management team	Section 3.1
254.23(c)	Spill response operating team	Section 3.1
254.23(d)	Spill response operation center	Section 3.4
254.23(e)	Oil stored, handled, or transported	Section 8.3.1
254.23(f)	Procedures for early detection of a spill	Section 8.1
254.23(g)(1)	Spill notification procedures	Section 5.0
254.23(g)(2)	Methods to detect/predict spill movement	Section 9.3
254.23(g)(3)	Methods to prioritize areas of importance	Section 9.5
254.23(g)(4)	Methods to protect areas of importance	Section 9.5
254.23(g)(5)	Containment and recovery equipment deployment	Section 10.0
254.23(g)(6)	Storage of recovered oil	Section 10.5
254.23(g)(7)	Procedures to remove oil and oil debris from shallow waters	Section 10.4.2
254.23(g)(8)	Procedure to store, transfer, and dispose of recovered oil and oil-contaminated materials	Section 10.5
254.23(g)(9)	Methods to implement dispersant use plan and in situ burning plan	Section 10.4.3
254.24(a)	Inventory of spill response resources	Attachment 7

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# 1.0 Introduction

Mayflower Wind Energy LLC (Mayflower Wind) plans to develop an offshore wind renewable energy generation project located in federal waters off the southern coast of Massachusetts in the Outer Continental Shelf (OCS) Lease Area OCS-A 0521 (the Lease Area) which will deliver electricity to the regionally administered transmission system via export cables with landing location(s) in Falmouth, Massachusetts and onshore transmission system extending to the point of interconnection in Bourne, Massachusetts (the Project). The Mayflower Wind Project is expected to begin operation in 2027 and to have an expected operational life of 33 years, although extensions of the operational life are possible.

# 1.1 Regulatory Applicability

The Water Act (33 USC 1251 et seq. (1972)) requires that owners or operators of offshore facilities and associated pipelines prepare and submit an Oil Spill Response Plan (OSRP) to the Bureau of Safety and Environmental Enforcement (BSEE). The Bureau of Ocean Energy Management (BOEM) requires that every OCS offshore wind project prepare and submit for approval an OSRP as part of the Construction and Operations Plan (COP). The OSRP describes in detail what actions the spill management team will take should an oil spill occur. In accordance with 30 CFR 254, this OSRP demonstrates that Mayflower Wind can respond effectively in the unlikely event that oil is discharged from the Project.

The Project is located in the OCS, as defined by 30 CFR 254.6 and Section 2 of the Submerged Lands Act (43 USC 1301). This plan has been written in accordance with the requirements of 30 CFR Part 254, Subpart B, Oil Spill Response Plans for Outer Continental Shelf Facilities.

The OSRP regulatory requirements are outlined in 30 CFR Part 254. This OSRP has been prepared considering the National Oil and Hazardous Substances Contingency Plan (40 CFR 300) commonly called the National Contingency Plan, and the Standard Federal Region I Response Team Regional Oil and Hazardous Substances Pollution Contingency Plan<sup>1</sup>, which is the applicable Area Contingency Plan (ACP).

## 1.2 Relationship to Other Plans

The U.S. Environmental Protection Agency's (EPA) Spill Prevention, Control, and Countermeasure (SPCC) requirements in 40 CFR 112 apply only to offshore facilities if they are classified as "oil drilling, production, or workover facilities." Oil storage quantities at the Operations Base onshore, may be such that an SPCC plan is required (e.g., > 1,320 gallons [gal]). If required, an SPCC plan will be developed separate from this OSRP.

The Commonwealth of Massachusetts does not require additional planning and response submittals for review and approval for offshore facilities.

## **1.3 Companies Covered**

Mayflower Wind Energy LLC is a joint venture of Shell and Ocean Winds. Mayflower Wind will own and operate the Project.

### 1.4 Coverage Area

The Area of Operations for the Mayflower Wind (Renewable Energy Lease Number OCS-A 0521) and covered by this plan includes the OCS in federal waters off the coast of Rhode Island and Massachusetts. The Lease Area is located within the area designated by BOEM as the Rhode Island-Massachusetts Wind Energy Area and under the jurisdiction of the U.S. Coast Guard (USCG) (Sector Southeastern New England and Sector Long Island Sound).

<sup>&</sup>lt;sup>1</sup> National Response Team (NRT). January 2016. Standard Federal Region I Response Team Regional Oil and Hazardous Substances Pollution Contingency Plan. Retrieved from

https://nrt.org/sites/38/files/2016%20	Regional%20Contingend	xy%20Plan%20Region%201.pdf.

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The Lease Area is approximately 127,388 acres (515 square kilometers) and is located approximately 26 nautical miles (nm) (48 kilometers [km]) south of the island of Martha's Vineyard and 20 nm (37 km) south of Nantucket.

# **1.5 Facility Description**

The Mayflower Wind Project consists of up to 147 wind turbine generators (WTGs) and up to five offshore substation platforms (OSP(s)). The offshore export cables and inter-array cables will be solid dielectric, which contain no fluids. WTG and OSP positions within the Lease Area will be arranged on a one by one nautical mile grid. **Attachment 1**, Figure A-1 identifies the positions of WTGs and OSP(s). An Operations Base consisting of a parts warehouse, basic maintenance shop, offices, control/monitoring facilities, and a dock for the service vessel will be manned at the commencement of operations.

Oil sources in the WTGs are present in gear boxes, yaw gears, greased bearings, lube oil cooling systems, pitch systems, service cranes, and temporary generators. Oil sources on the OSPs include power transformer insulating oil, lubrication oil, diesel in generators and tanks, hydraulic oil for platform cranes, reactors, cooling systems, and auxiliary/earthing transformers.

As an offshore wind project, this Project is not an oil production operation, exploratory drilling operation, or pipeline. Therefore, there is no continuous source of oil or hydrocarbon in the event of a release.

# **1.6 Contract Certification Statement**

During construction and operation, contracts/agreements will be in effect with a firm that will provide immediate access to appropriate spill response equipment and personnel. This firm will serve as the Oil Spill Removal Organization (OSRO). The ERT will have access to the resources of the ORSO.

Final agreements will be made upon receipt of permits and prior to construction, and this plan will be updated to provide the name and contact information for said firm. A copy of the OSRO contract will be maintained in **Attachment 2**.

## 1.7 Plan Review and Revision

This version of the OSRP is a draft working copy. Additional details will be provided for the OSRP as the size and buildout schedule of the Project are finalized.

In accordance with 30 CFR 254.30, the OSRP must be reviewed at least every two years. Documentation of this review will be provided in the OSRP 2-Year Review Log presented at the front of this OSRP. If the review does not result in modifications to the OSRP, the Chief of BSEE, and agency of the US Department of the Interior, should be notified that there are no changes. The BSEE Oil Spill Preparedness Division (Chief, OSPD) or designee must be notified in writing.

The OSRP must be modified and submitted to the Chief, OSPD for approval within 15 days when the following occurs:

- A change occurs which significantly reduces your response capabilities;
- A significant change occurs in the worst-case discharge scenario or in the type of oil being handled, stored, or transported at the facility;
- There is a change in the name(s) or capabilities of the oil spill removal organizations cited in the OSRP; or
- There is a significant change to the ACPs.

## **1.8 Management Commitment**

This plan has been developed for the Project to prevent, prepare for, and/or control unplanned release/spills of oil occurring. Mayflower Wind herein commits the necessary resources to fully prepare and implement this plan and will obtain through contract the necessary private personnel, resources and equipment to respond, to the maximum extent practicable, to a worst-case discharge or substantial impacts of such a discharge.

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# 2.0 Emergency Management Process

Mayflower Wind's response philosophy is to "Prudently Over-Respond," as it is far easier and more acceptable to demobilize resources than to mobilize resources in the face of a misunderstood or escalating situation. However, safety and protection of life always remains the top priority. Managing emergencies is separated into the Incident Response (initial response) process and Incident Management (protracted response) process covered in this section.

# 2.1 Emergency Levels

Mayflower Wind identifies emergencies in line with the International Petroleum Industry Environmental Conservation Association where there are three distinct emergency levels or "Tiers" to classify the severity and needs of the specific incident. The three tiers and a brief explanation of each tier is listed below.

**Tier 1:** A Tier 1 emergency is typically operational in nature, contained in a specific operational area, and responded to with local, asset-level resources (people and equipment) that are immediately available. Tier 1 Team Roles and Responsibilities are based on the type of emergency requiring a response.

**Tier 2:** A Tier 2 emergency requires additional response resources beyond those available locally. Tier 2 events are usually large in scale and duration, and likely involve outside contractors and service providers as well as government agencies and the media. Impacts could extend beyond local/state level. Mayflower Wind Emergency Response resources from other businesses could assist in a local response.

**Tier 3:** A Tier 3 emergency is an event that, due to scale and impact, calls for an extensive response from a large range of national and international resources. Tier 3 events likely involve substantial government and media activities. Cascading resources are likely required from outside the region and involve Emergency Response expertise from various Shell businesses, in addition to those available through Mayflower Wind.

Tier 2 and 3 Teams roles and responsibilities are based on Mayflower Wind's Incident Management System (IMS) regional response plan requirements.

## 2.2 Incident Response

All emergencies have an "initial" response period. Most small scale or short-term (Tier 1) incidents will be managed under the Incident Response process, which may last from the incident occurrence to the conclusion of the incident, by which time the following will have occurred:

- Notification and activation of the Emergency Response Team (ERT);
- Initial response actions and assessment;
- Notification and Incident Management Team (IMT) support request, as needed; and
- Completion of an Incident Briefing Form (See Attachment 3).

An Incident Response Checklist form is provided in Attachment 3.

### 2.3 Incident Management

For large scale, long term, or complex emergencies (Tier 2/3), the management of the emergency will transition from Incident Response, which may have IMT support to Incident Management which is an operational planning cycle, with IMT support or IMT command and control. The incident will not transition to the IMT until the following occur:

- Initial response actions and assessment by the ERT;
- Notification of the IMT;
- Completion of an Incident Briefing Form;
- Assembly and briefing of the IMT;
- Initial Command Meeting; and
- Decision to transition to the IMT.

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Once the incident transitions into an Incident Management phase, the IMT will assume command and control of the incident.

## 2.4 Return to Normal Operations

The decision to return to normal operations will be made during any incident. Consideration of when to demobilize activated Emergency Response resources will be at the discretion of the Incident Commander (IC) or Unified Command (UC) IC (UC-IC) once the Mayflower Wind IC, the UC-IC and the Business Executive agree on the transition from the incident phase to the project phase (including repair and/or recovery).

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# 3.0 Incident Management System (IMS)

The Mayflower Wind IMS, adapted from the Shell IMS and industry standards, is a proven, all-hazard management system that is appropriate for all types of emergencies, regardless of size, from the time an incident occurs until the requirement for management and response operations no longer exists.

The elements of the Mayflower Wind IMS model were developed and refined from actual incidents and mirror many areas of the National Incident Management System's (NIMS) Incident Command System (ICS)<sup>2</sup>. This common approach enables organizations using the Mayflower Wind IMS to integrate their response with other organizations that are using the concepts of the ICS.

Mayflower Wind IMS follows the National ICS principles and elements that include:

- Common terminology
- Modular organization
- Management functions
- Management by objectives
- Consolidated action plans
- Manageable span of control
- Pre-designated incident facilities
- Comprehensive resource management
- Unified command
- Integrated communications

While the Mayflower Wind IMS is designed to be flexible, five major management functions are the foundation upon which the organization develops. These management functions are applied when preparing for possible events or when managing a response to Tier 1, 2, or 3 emergencies (see Section 2.1) for definitions of the tier levels).



The Mayflower Wind IMS organization can be expanded or contracted, depending on the changing conditions of the emergency. This means that Mayflower Wind proactively ramps up and assigns personnel to primary IMS functions as appropriate at the onset of an emergency.

The Mayflower Wind IMS assigns overall authority to one individual, the IC, to make decisions appropriate to the circumstances and in compliance with applicable regulations and corporate policy/directives. In Tier 2/3 incidents, Command may transition to Coordinated Command, where the Mayflower Wind IC works in alignment with agency IMT IC, or UC, where Mayflower Wind's IC is joined by agency UC-ICs under one unified IMT organization.

A basic tenant of the Mayflower Wind IMS is that the IC is responsible until authority has been delegated. For example, in a small incident, the IC may perform all five major management functions. For larger incidents, the IC may choose to delegate an authority, such as logistics, to another person.

<sup>2</sup> FEMA. 2017. National Incident Management Systems. Prepared by the Federal Emergency Management Administration.

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After the initial proactive mobilization of resources, level of complexity and manageable span of control (i.e., how many people any individual can successfully manage) is what drives the expansion or contraction of the IMS organization.

# 3.1 Emergency Response Team Organization

The Emergency Response Team (ERT) organization is viewed as a tactical team under the command of an initial IC. The organizational structure will be dictated by the operational requirement of the individual responders. Within the IMS all participating personnel will have a unique position, role, and specific responsibilities. Additionally, common responsibilities of all personnel involved in the Mayflower Wind IMS are:

- Take steps to ensure their own safety and the availability of personal protective equipment;
- Understand their specific responsibilities during an emergency;
- Obtain an orientation briefing;
- Ensure their training is adequate for emergency procedures (Section 12.0);
- Report all emergency situations;
- Participate in drills and exercises (Section 12.0);
- · Carry out assigned portions of the action plan; and
- Understand other's responsibilities.

The ERT is tasked with identification of an incident, notification of an incident and executing initial response actions to mitigate against the incident. They are responsible for managing an incident until stable, or until command is passed on to the IMT.

### 3.2 Incident Management Team Organization

Mayflower Wind will maintain an IMT organization at the Operations Base to support, and/or manage, incidents associated with Mayflower Wind facilities. Upon notification, the IMT can activate to support the initial IC, and then assume the Incident Command role. The IMT can supplement with personnel from Shell Americas Emergency Management based on size, complexity and duration of the incident. The Operations Base will serve as the Mayflower Wind Spill Response Operations Center (SROC), and Incident Command Post (ICP) until and unless UC is established, and a UC Incident Command Post is identified. See Section 3.4 for additional information regarding the SROC.

ERT roles for Initial Incident Management Organization will be transitioned to the Mayflower IMT Organization (Expanded) when deemed necessary to do so. This transition will be conducted verbally, as well as in writing to document the transition. Personnel who are members of the ERT may be tasked with a local/field role in the expanded IMT (usually in Operations Section or Safety), if it is safe to remain at their current location. Where ERT members are used in the expanded IMT, their roles integrate into one IMT for continuity, accountability, and unity of command.

The roles and responsibilities of the specific command and general staff positions are described in Sections 3.2.1 and 3.2.2, respectively. The Mayflower Wind IMS organization can be scaled and/or expanded to include additional positions if necessary. Figure 3-1 illustrates the IMS organization structure for expanded incidents.

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Figure 3-1. IMS Organizational Chart

#### 3.2.1 Command Staff

#### 3.2.1.1 Incident Commander

The Incident Commander (IC) is the individual responsible for all incident activities, including the development of strategies and tactics and the ordering and release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site.

#### 3.2.1.2 Unified Command

The Unified Command (UC) is an application of ICS used when there is more than one agency with incident jurisdiction or when incidents cross political jurisdictions. Agencies work together through the designated members of the UC to establish their designated ICs at a single ICP, working in conjunction with the responsible party IC, and to establish a common set of objectives and strategies and a single Incident Action Plan (IAP). This is accomplished without losing or abdicating authority, responsibility, or accountability.

#### 3.2.1.3 Information Officer

The Information Officer (IO) is responsible for developing and releasing information about the incident to the media and public. Only one IO will be assigned for each incident, including incidents operating under UC; however, the IO can have as many assistants as necessary.

#### 3.2.1.4 Liaison Officer

The Liaison Officer (LO) is assigned to the incident to be the primary coordinator for the liaison network. The LO is a conduit of information and assistance between organizations and does not normally have delegated authority to make decisions on matters affecting an organization's participation in the incident; however, the IC/UC may assign additional responsibilities or authorities to the LO to effectively manage complex incidents.

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#### 3.2.1.5 Safety Officer

The Safety Officer (SO) is to develop and recommend measures to ensure personnel safety and occupational health of not only response workers, but also the public, and to anticipate, recognize, assess, and control hazardous and unsafe conditions or situations. These measures should be captured within a Site Safety and Health Plan.

#### 3.2.2 General Staff

#### 3.2.2.1 Operations Section Chief

The Operations Section Chief is responsible for the management of tactical operations directly in support of the primary mission. The Operations Section Chief activates and supervises IMS organization elements in accordance with the IAP and directs the IAP implementation. The Operations Section Chief also directs the preparation of operational plans, requests or releases resources, monitors operational progress, makes expedient changes to the IAP when necessary, and reports those changes to the IC/UC.

#### 3.2.2.2 Source Control Support Coordinator

Source Control is responsible for minimizing or stopping the flow of oil.

The Source Control Support Coordinator (SCSC) is a technical specialist and is responsible for minimizing or stopping the flow of oil. The SCSC serves as the principal advisor to the Federal On-Scene Coordinator (FOSC) for source control issues associated with the Project. The SCSC serves on the FOSC's staff and is responsible for providing source control support for operational decisions and for coordinating on-scene source control activity.

As noted previously, as an offshore wind project, there will be no continuous source of oil (well fluids or production fluids). The SCSC will minimize or stop the flow, but all sources of discharge are finite volumes.

#### 3.2.2.3 Planning Section Chief

The Planning Section Chief is responsible for the development of the IAP, the collection, evaluation, dissemination, and use of incident information and maintaining status of assigned and demobilized resources. The Planning Section Chief is also responsible for assisting the Operations Section Chief in the development of response strategies and facilitating meetings and briefings.

#### 3.2.2.4 Environmental Unit Leader

The Environmental Unit Leader is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting.

#### 3.2.2.5 Logistics Section Chief

The Logistics Section Chief is responsible for providing facilities, services, people, resources, and materials in support of the incident.

#### 3.2.2.6 Security Manager

The Security Manager is responsible for providing safeguards needed to protect personnel and property from loss or damage.

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#### 3.2.2.7 Finance Section Chief

The Finance Section Chief is responsible for all financial, administrative, and cost analysis aspects of the incident and supervising members of the Finance/Administration Section.

#### 3.2.2.8 Human Resources Specialist

The Human Resources Specialist is responsible for providing direct human resources services to the response organization, including ensuring compliance with all labor-related laws and regulations.

### 3.3 Oil Spill Response Organization

An Oil Spill Response Organization (OSRO) will provide oil spill response materials and supplies, equipment, and dedicated vessels in the event of an unplanned release/oil spill at the Project. The supplied equipment and materials are of sufficient quantity and recovery capacity to respond effectively to oil spills from the facilities covered by this OSRP.

For the Mayflower Wind Project, a company will be nominated before operations and will provide spill response services and serve as members of the ERT and/or IMT. The OSRO team will consist of trained, prepared, and available (on a 24-hour per day basis) personnel and their field supervisors who will deploy and operate oil spill response equipment, resources and materials.

As necessary, additional resources and contractors may be engaged. Massachusetts Department of Environmental Protection (MassDEP) maintains as list of Emergency Response Service providers<sup>3</sup> in MassDEP's Southeast Region.

Contractual arrangements with the OSRO will be established on receipt of permits for the Project and provided in **Attachment 2**.

#### 3.4 Spill Response Operations Center

The following provides a discussion of the features and capabilities of the preplanned SROC/ICP. The Operations Base for Mayflower Wind will serve as the ICP until and unless the Unified Command has been established, and the Unified Command ICP designated. The Operations Base address and contact information will be updated prior to operations. The OSRP will be updated to add the Operations Base address and phone number(s) prior to operations.

The Mayflower Wind Operations Base will, at a minimum, be supplied with a conference room equipped for web-based communications (e.g., video conferencing), telephone system, adequate parking, standard office equipment and supplies, radio communications, food and drink, toilet facilities, first aid kit, office space, and an emergency generator.

Should it become necessary to establish a formal ICP, one will be setup in conjunction with state and federal agencies. The Rhode Island and Southeastern Massachusetts Area Contingency Plan (Rhode Island & Southeastern Massachusetts Area Contingency Plan [RI & SEM ACP], 2015) identifies a number of potential facilities that may accommodate ICP in the short term or long term.

<sup>&</sup>lt;sup>3</sup> <u>https://www.mass.gov/doc/list-of-companies-licensed-as-hazardous-waste-hw-transporters-who-provide-emergency-response/download</u>

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# 4.0 Spill Response Communications

The following provides a description of the primary and alternate communication systems that will be used to direct and coordinate the response to an oil spill. The established communication systems address internal and external notifications (see Section 5.0) and facilitate the management of response operations. A communications network will be established that will link the ICP to all field operations as necessary. Portable communication equipment, including cellular phones and/or handheld radios would be distributed to key response personnel.

### 4.1 **Telephone Communications**

Land based and cellular telephones will serve as the primary means of communication for internal and external notifications, as well as for management of any response actions. Contact information (including office phone and mobile phone numbers) for internal and external notifications are provided in Section 5.0 and will be updated as the Project nears construction and operation phases.

# 4.2 Radio Frequency

Very high frequency - frequency modulation (VHF-FM) Channel 81A (157.075 megahertz [MHz]) is the frequency for ground communications between the Unified Command and USCG units on-scene. It is also the secondary frequency for communication between the Unified Command and on-scene units from local agencies.

As per the ACP, it is expected that each government agency and private company involved in the response operation will continue to use its own normal working frequency(s) for internal communication. Alternate oil spill containment and cleanup frequencies: designated in 47 CFR Part 90.65 for use in oil spill containment and cleanup operations include:

- 1. 150.980 MHz VHF-FM;
- 2. 154.585 MHz VHF-FM;
- 3. 158.445 MHz VHF-FM;
- 4. 159.480 MHz VHF-FM;
- 5. 454.000 MHz ultrahigh frequency (UHF); and
- 6. 459.000 MHz UHF.

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# 5.0 Notifications and Reporting

The Mayflower Wind OSRP notification and reporting requirements are detailed in the sections that follow. Refer to the "OSRP Quick Guide" at the beginning of this plan for immediate actions to be taken on detection/observation of a spill.

### 5.1 Notification Procedures

#### 5.1.1 Internal Notifications

All spills are reported to the Operations Supervisor immediately on discovery. The Operations Supervisor in turn will notify the appropriate QI or alternate from the IMT. The contact information for QIs and alternates is provided in Table 5-1.

Table to be populated prior to start of operations			

Position	Cell	Email
Qualified Individual, Title	+1 (XXX) XXX-XXXXX	XXX@XXX.com
Alternate Qualified Individual, Title	+1 (XXX) XXX-XXXXX	XXX@XXX.com
Alternate Qualified Individual, Title	+1 (XXX) XXX-XXXXX	XXX@XXX.com
Alternate Qualified Individual, Title	+1 (XXX) XXX-XXXXX	XXX@XXX.com
	Qualified Individual, Title         Alternate Qualified Individual, Title         Alternate Qualified Individual, Title         Alternate Qualified Individual,         Title	Qualified Individual, Title       +1 (XXX) XXX-XXXXX         Alternate Qualified Individual, Title       +1 (XXX) XXX-XXXXX

#### Table 5-1. Qualified Individuals and Alternates

#### 5.1.1.1 Minor Discharges

Minor discharges which do not reach adjacent waters, including leaks, spills, or other unintentional releases, will be immediately reported to the first available Operations Supervisor so that such discharges can be promptly corrected. These discharges include leaks from seams, gaskets, piping, pumps, valves, rivets, and bolts. The Operations Supervisor may serve as the QI for responses to minor spills/discharges.

#### 5.1.1.2 Moderate to Large Discharges

In the case of an uncontrolled discharge or a discharge beyond the capability of site personnel, the following notifications will be promptly made:

- Immediate notification by the first responder/observer of the Operations Supervisor or senior person on duty, who will function as the Oil Spill Response Coordinator (OSRC)/IC pending arrival of the QI;
- · Call for medical assistance, if an injury has occurred;
- Notification of the IMT by the acting OSRC/IC; the IMT will be activated to respond to the incident, as deemed necessary; and
- Request for assistance from other site personnel and/or the OSRO, if required.

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#### 5.1.1.3 OSRO Contact Information

Mayflower Wind will retain the services of an oil spill response organization. The OSRO will be contracted and contact information identified prior to construction and operation start-up.

#### 5.1.2 External Notifications

Mayflower Wind will develop an external notification procedure to ensure that the company will make and complete all required government agency notifications within the necessary timeframe and/or as soon as practicable to do so.

#### 5.1.2.1 Initial Notifications

As required by 30 CFR 254.46(a), the OSRC/IC will immediately notify (within one hour of detection) the U.S. Coast Guard National Response Center (NRC) at +1 (800) 424-8802 if an oil spill from the Mayflower Wind facilities or an offshore spill of unknown origin is observed.

#### Immediate notification is required to the NRC. Do not wait to obtain all information before notifying NRC.

The MassDEP notification must be made within two hours of discovery of a release by calling the MassDEP Emergency Response line at: +1 (888) 304-1133.

Follow-up notifications will be provided to the appropriate agencies, as incident information becomes available. See Table 5-2 for initial agency notification requirements and contact information. Additional follow-up reports will be provided as deemed appropriate or as requested by agency personnel.

Agency	Phone	Requirements for Notifications
National Response Center	+1 (800) 424-8802 (serves to notify EPA and USCG)	Immediate notification (less than one hour) is required for all discharges of oil sufficient to produce a sheen on navigable waters of the United States.
MassDEP	+1 (888) 304-1133	Immediate notification (less than two hours) is required for all discharges of oil to water and any spill equal to or greater than 10 gal on land. In addition, the local fire department should be notified, if applicable.
EPA Region 1	+1 (888) 372-7341 or +1 (617) 918-1251	The EPA must be notified through the NRC for all oil discharges into inland navigable waters of the U.S. sufficient to create a sheen. A written report is not required.
		If the facility has discharged more than 1,000 gal of oil in a single discharge or more than 42,000 gal of oil in each of two discharges occurring within any 12-month period, the following must be submitted to EPA within 60 days:
		Name of facility;
		Name of reporting party;
		Location of facility;
		<ul> <li>Maximum storage or handling of the facility and normal daily throughput;</li> </ul>
		• Corrective action and countermeasures that have been taken, including a description of equipment repairs and replacements;

#### Table 5-2. Initial Agency Notifications

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Agency	Phone	Requirements for Notifications
		<ul> <li>Adequate description of the facility, including maps, flow diagrams, and topographical maps;</li> </ul>
		<ul> <li>The cause of such discharge as including a failure analysis of the system or subsystem in which the failure occurred, additional preventive measures that have been taken or contemplated to minimize the possibility of recurrence; and</li> </ul>
		<ul> <li>Such other information as the EPA may reasonably require pertinent to the Plan or discharge.</li> </ul>
USCG	+ 1 (607) 223-4812 or + 1 (617) 406-9011	The USCG must be notified via the NRC for all oil discharges into coastal navigable waters of the U.S. sufficient to create a sheen. A written report is not required.
Occupational Safety and Health Administration (OSHA)	+ 1 (617) 565-9860	OSHA must be notified by telephone if a work-related accident occurred which caused a death, or three personnel injuries which required hospitalization.
BSEE	+1 (504) 736-2595 or +1( 504) 400-7836	Documentation of the biennial review must be submitted to the BSEE Oil Spill Preparedness Division (Chief, OSPD) or designee in writing. If the OSRP must be modified, it must be submitted to the Chief, OSPD for approval within 15 days.

#### 5.1.2.2 Other External Notifications

Additional initial notifications may be appropriate depending on the nature and location of the spill. See **Attachment 4** for a list of additional contacts.

#### 5.1.3 **Public Notification**

In the event that public notification of a spill is required, as deemed necessary by the FOSC, be prepared to discuss the following:

- The nature and extent of the economic losses that have occurred or are likely to occur;
- The persons who are likely to incur economic losses;
- The geographical area that is affected or is likely to be affected;
- The most effective method of reasonably notifying potential claimants of the designated source; and
- Any relevant information or recommendations.

## 5.2 Reporting

#### 5.2.1 Internal Spill Reporting

Copies of spill incident reporting forms are provided in Attachment 3 Notification and Reporting Forms.

#### 5.2.2 Incident Report

Mayflower Wind will file a written follow-up report for any spill from Project of one barrel (42 gal) or more. The BOEM Regional Supervisor must receive this confirmation within 15 days after the spillage has been stopped. Reports will include the cause, location, volume, and remedial action taken. Although unlikely to occur from Mayflower Wind, reports of spills of more than 50 barrels (2,100 gal) must include information on the sea state, meteorological conditions, and the size and appearance of the slick. The Regional Supervisor may require an analysis of the response. It should be noted that the Offshore Substation Platforms (OSPs) are the only offshore units which each have a quantity of oil above the 50-barrel threshold.

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# 6.0 Available Technical Expertise

A wide range of technical expertise and knowledge of resources in the Massachusetts/Rhode Island offshore area are available within various federal, state and local agencies. Additional expertise that may be useful in identifying resources that may be affected or responding in the case of a spill are also available via environmental consultants, colleges and universities, and non-profit organizations. A listing of additional resources, including contact names, are also provided in the <u>RI & SEM ACP Attachment 9000-3 Sector</u> <u>Phone Book</u>.

Contact information for key resources that may be drawn upon in the event of a spill are provided in **Attachment 5**. Sources of expertise have been divided into several categories including ecological resources, commercial fishing and navigation, and other. The list or available agencies and organizations provided in **Attachment 5** is not intended to be all inclusive, and additional resources not listed may be drawn upon, as needed, in the event of a spill.

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# 7.0 Strategic and Tactical Spill Response Plan

### 7.1 Strategic Objectives and Priorities

Emergency conditions will be managed in a controlled manner, and oil release response operations will be conducted with the following objectives:

- · Continuously assess and maintain personnel safety;
- Secure or isolate the source;
- Contain the release;
- Protect sensitive areas;
- · Coordinate response actions and customize response organization to situation;
- Think ahead and anticipate needs;
- Recover product;
- Document incident; and
- Complete a root cause analysis after the incident.

### 7.2 Tactical Response Plan

The general procedures for implementation of a tactical plan are:

- Provide maximum protection to response personnel;
- Deploy containment resources, and if appropriate, divert spill to a suitable and accessible collection point with the least impact to surrounding areas;
- Boom off sensitive areas;
- · Maximize on-water containment and recovery operations; and
- Handle wastes to minimize secondary environmental impacts.

Mayflower Wind will establish contractual agreements with an OSRO to contain a spill on the ocean and clean up the area after a spill. The ERT will use containment equipment available at the site to surround or divert the spill until the OSRO arrives on scene.

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# 8.0 Spill Detection, Source Identification and Control

### 8.1 Spill Detection

Along with the regular inspections (see Section 8.3.2.4), sensors and alarms also serve to prevent and detect discharges. All of the WTGs will be equipped with sensors to automatically detect a loss in fluid pressure and/or an increase in fluid temperature, which will enable them to be shut down in case of a fluid leak. The WTG lube oil systems, cooling oil systems and hydraulic fluid systems will also be tested and checked on a regular basis by operations staff to verify that the equipment is operating properly, is in reliable working order and is not leaking fluids.

The individual WTG transformers will be equipped with oil level sensors that detect any sudden drop in oil levels, which would send an alarm to the central computer system at the Operations Base. The transformers will also be equipped with release valves that trip when internal pressure becomes too great, potentially preventing a catastrophic failure of the transformer.

## 8.2 Pipeline Spill Detection and Location

Not applicable. The Mayflower Wind Project does not include pipelines.

### 8.3 Source Control

#### 8.3.1 Source Identification

Fuel oil, lubricant, coolants, and dielectric fluids (silicon-based) are associated with transformers, hydraulic systems, and other components of each WTG.

Diesel storage will be located on the OSPs. Materials and estimated quantities are provided in Table 8-1. Safety Data Sheets are provided in **Attachment 6**.

#### Table 8-1. OSP Material Storage (quantities per OSP)

Component/System	Material	Volume gal (L)*
OSP Generator	Diesel fuel	10,000 (26,500)
OSP Generator	Lubricant	300 (1,150)
OSP Generator	Cooling water (with 30% glycol)	300 (1,150)
OSP – HVAC system	Refrigerant	300 lbs (135 kg)
OSP – HVAC system	Polyester oil	50 (190)
OSP – Crane	Hydraulic oil	150 (570)
OSP – Transformer oil	Dielectric insulating oil	150,000 (570,000)
OSP – Electrical coating	Epoxy coating	5 (20)
OSP – Fire extinguishing agents	Foam for firefighting system	4,000 (15,000) (water/ foam concentrate)

\*Units are in gallons (Liters) unless otherwise specified

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Each WTG will contain silicon-based dielectric fluid in transformers. Each WTG will also have associated with it lubricating oils, coolants, and grease. Volumes of storage per WTG is presented in Table 8-2.

#### Table 8-2. WTG Material Storage (quantities per WTG)

Component/System	Material	Volume gal (L)*
WTG Bearings and yaw pinions	Grease	150 (570)
WTG Hydraulic Pumping Unit, Hydraulic Pitch Actuators, Hydraulic Pitch Accumulators, Mechanical Brake	Hydraulic oil	200 (750)
WTG Drive Train Gearbox, Yaw Drives Gearbox	Gear oil	600 (2,500)
WTG Transformer	Transformer silicon/Ester oil	2,000 (7,500)
WTG Auxiliary Power Generators	Diesel fuel	900 (3,500)
WTG Tower Damper and Cooling System	Glycol/Coolants	500 (2,000)

\*Units are in gallons (Liters) unless otherwise specified

All of the underwater cables that will be installed would be solid dielectric, which contain no fluids.

Fuel oil, lubricants, coolants, and dielectric fluids have the potential to be accidentally released during material transfers, or if a catastrophic event causing structural damage to the WTGs or OSPs sufficient to breach structural containment were to occur. Only a complete and catastrophic collision with a large oil tanker or freighter could lead to an oil spill associated with the total loss of the OSP. Descriptions of the vessel classes and vessel traffic in the area are provided in COP Appendix X, Navigation Safety Risk Assessment. Collision between smaller vessels (e.g., maintenance vessel, recreational, or commercial fishing vessel) and a WTG or OSP foundation will not cause a release of oil from a WTG or OSP, but may cause a release of oil from the colliding vessel. The one by one nm grid spacing of WTG and OSP positions makes impact to more than one foundation highly unlikely. Further, the use of 1 nm spacing across all of the lease areas further minimizing the potential for collision. In addition, the WTGs and OSPs incorporate use of navigational aids including WTG lighting, fog horns, and radar enhancement, among others. The consequences of vesselrelated incidents depend on many parameters, such as type of ship, collision angle, vessel speed at collision and design of the structure itself. If larger ships, such as oil tankers, collide with a WTG, in many cases it is to be expected that only the impacted WTG and foundation will be seriously damaged, and the ship will remain undamaged (Dalhoff & Biehl, 2005)<sup>4</sup>. A vessel collision does thus not necessarily result in a release of oil or other harmful substances from the vessel. Should such an incident occur, however, the vessel owner/operator is responsible for a spill which occurs from their vessel. Vessel Response Plans are required by the USCG for maritime operators that are carrying certain quantities of chemicals and/or refined petroleum products.

Table 8-3 provides an estimate of the release predictions based on each major type of container failure that could potentially occur at the Mayflower Wind Project. Each release prediction includes the quantity of oil released, rate of release, containment measure in place, and likely response actions. The total quantity of oil estimated in the release is based on a worst-case discharge using the maximum container volume.

<sup>4</sup> Dalhoff, P. and F. Biehl. 2005. Ship Collision, Risk Analysis - Emergency Systems -Collision Dynamics.

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Table 8-3. Release	Predications/Worst Case Discharge	
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Type of Failure & Source	Maximum spill (gals)	Material	Maximum release rate (gal/hour)	Containment and Control
Failure, rupture, or leak of OSP transformer	150,000	Dielectric insulating oil	Rates vary from a small leak up to an instantaneous release	Secondary containment provided for 115 percent of High Voltage transformer volumes. Each transformer has a drip tray, running down to the sump tank, which is emptied by a service operations vessel or equivalent vessel.
Failure, rupture, or leak of OSP backup generator diesel fuel tank	7,000	Diesel fuel	Rates vary from a small leak up to an instantaneous release	Contained within the double-wall tank or the OSP secondary containment structure. A spill is not expected to escape the double-wall tank or the secondary containment structure of the OSP. Boom and sorbent materials available on OSP and from OSRO.
Failure, rupture, or leak of WTG transformer	2,000	Silicon- based dielectric fluid	Rates vary from a small leak up to an instantaneous release	Containment is provided at the bottom of the nacelle within the secondary containment feature capable of containing 115 percent of the dielectric volume. A spill is not expected to escape the secondary containment feature. Boom and sorbent materials available on OSP and from the OSRO.
Failure, rupture, or leak of gearbox in the nacelle of the WTG	800	Lubricating oil and/or coolant	Rates vary from a small leak up to an instantaneous release	Likely to flow down the inside of the tower to the base. Spill would likely be limited to the nacelle's internal fluid catch basins or contained within the tower base. Absorbent materials would be used for response to small spills. Boom and sorbent materials available on OSP and from the OSRO.

### 8.3.2 Source Control Measures

#### 8.3.2.1 Secondary Containment

Each WTG will have silicon-based dielectric fluid in transformers. Transformers are equipped with an integral oil pan capable of containing 115 percent of the dielectric volume. As such, and absent catastrophic damage to the WTG structure, release of fluids from the WTG transformers to adjacent waters is unlikely. The WTGs are designed to be self-containing such that any leaks would be directed to collection areas within the turbine structure and in most cases, will not result in a discharge to the adjacent waters.

The 4,500-gal emergency diesel generator tank is a double-walled tank positioned within a secondary containment structure capable of containing 115 percent of the diesel generator tank volume on the OSP. Therefore, this tank is provided with tertiary containment further reducing the possibility of a release occurring from this tank system. In addition, the OSP itself provides additional containment.

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#### 8.3.2.2 Transfer and Unloading Operations

The hydraulic fluids in the WTGs must be replenished or replaced on an infrequent basis (generally less than once per year and sometimes only once every five years). Staff will climb up the inside of the tubular tower and remove fluids in small (typically five gal) containers and lower them to the tower base using a small maintenance lift that is built into the tower. The containers are then transferred to an onshore Operations Base for temporary storage in 55-gal drums (stored on spill containment pallets). Typical temporary storage time is less than one month before a licensed transporter hauls the used hydraulic fluid away. Replacement fluids are added using the same method, only in reverse. Due to the small volumes being transferred or stored at any one time, spill exposure is minimized. To support the need for replenishment of hydraulic fluids, lube oil, and lubricants are delivered to the site in sealed drums or containers as needed. Similarly, these used oils are removed on an as needed basis.

The silicon-based dielectric fluid in transformers is also replaced on a very infrequent basis. A vessel carrying small amounts (less than 500 gal) of the dielectric fluid would be used to complete the replenishment process when needed. Strict unloading procedures as outlined below are used during all unloading and transfer operations.

Fuel and dielectric fluid transfer operations occur through flexible hoses. The hoses are supported and designed to minimize abrasion during transfer operations. Maintenance and refueling vessels will be securely docked prior to initiating fuel transfer. Measures taken to prevent spills prior to, during, and after unloading include:

- Prior to unloading: Oil/fuel levels are verified, connections are rechecked, and hoses and fittings are examined for integrity prior to use for transfers;
- During unloading: Only trained personnel authorized to conduct the transfer are used. The transfer and pumping system are continually monitored for leaks and the oil level in the receiving container is frequently monitored to prevent overfilling; and
- After unloading: The transfer hose is properly drained and disconnected and all tanks and connections are checked for proper closure prior to departure.

#### 8.3.2.3 Security

Security measures to minimize vandalism and unauthorized access to the WTGs or OSP will be provided with several methods including, signage, video camera, boat surveillance and observations, locked access hatchways and possible motion sensors, among others.

#### 8.3.2.4 Inspections

Visual or remote monitoring inspections of oil containing equipment and systems, containers, secondary containment areas, and electrical equipment will be conducted on a routine basis to maintain integrity as part of the regular facility inspection program. These inspections will be documented on the Inspection Checklist, provided in **Attachment 3**. During inspections, personnel will observe oil-containing equipment levels and identify any visible signs of deterioration, the integrity of the secondary containment systems, leaks that might cause a spill, and accumulation of oil. Visible oil leaks will be promptly corrected and recorded.

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# 9.0 Spill Assessment

## 9.1 Locating a Spill

The location of an oil spill will typically be detected based on visual observation during routine inspections or maintenance. Spills may also be detected automatically with sensors and/or alarms. For spills that reach the open waters, surveillance will be conducted by boat and/or helicopter if necessary.

# 9.2 Determining the Size and Volume of a Spill

The size of any potential spill will be limited to the maximum volume of oil/fluid contained in the spill source (e.g., WTG transformer or diesel fuel storage tank). Due to the spatial separation of the WTGs (and the OSP from proximate WTGs), it is highly improbable that a simultaneous spill from all sources would occur. Maximum worst case releases have been defined in Table 8-3 of this plan. Outside of catastrophic failure, spills would be contained within secondary containment structures, and no release to open waters would occur.

### 9.3 Predicting Spill Movement

If appropriate for spills reaching open water, Mayflower Wind will use a sophisticated oil spill model called SIMAP to assess the fate and trajectory of oil spill scenarios<sup>5</sup>. The model was developed by Applied Science Associates of Narragansett, Rhode Island<sup>6</sup>, and has been used internationally to provide oil spill response planning and training.

# 9.4 Monitoring and Tracking the Spill Movement

If warranted based on the nature of the spill (size, location, material, etc.) and in consultation with state and federal regulators during the cleanup and recovery of an oil spill, a quantitative spill assessment will be conducted to estimate the amount and location of material spilled. The daily spill assessment and movement is a useful tool in directing response efforts. In order to obtain information, the following actions may be taken up to daily:

- · Calculate tides daily through a complete cycle;
- View aerials of the spill area to visually assess conditions;
- Boat patrol of the areas affected;
- Investigate for pockets of oil under piers and docks during low tide periods;
- Complete an Incident Assessment Checklist (see Table QG-1); and
- Use of helicopters to provide overflights.

# 9.5 Sensitive Resource Identification

As part of the spill response planning, Mayflower Wind will identify potentially affected sensitive resources. Numerous resources are available to identify sensitive resources that may be impacted by a spill. The following resources are available to support the identification of resources:

- Environmental Sensitivity maps provided in the <u>RI & SEM ACP</u>. Issued August 2015.
- Environmental Sensitivity Index (ESI) maps, available from National Oceanic and Atmospheric Administration (NOAA), provide a summary of coastal resources that are at risk if an oil spill occurs in the area. Maps are available for downloaded in various formats at:
  - Massachusetts https://response.restoration.noaa.gov/esi\_download#Massachusetts; and
  - Rhode Island https://response.restoration.noaa.gov/esi\_download#RhodeIsland.
  - Mayflower Wind Designated Protected Areas Study report submitted with the COP (Appendix L1).

<sup>&</sup>lt;sup>6</sup> <u>http://www.asascience.com/</u>

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<sup>&</sup>lt;sup>5</sup> <u>http://asascience.com/software/simap/</u>

# **10.0 Mobilization and Deployment Methods**

As noted previously, the maximum potential spill volumes associated with the Mayflower Wind Project are very small and finite compared to those associated with offshore oil production and exploration facilities. This, in combination with containment measures designed to contain spills or leaks under normal circumstances, greatly limits the potential for release to adjacent waters, and the associated response needs. However, appropriate and timely deployment of spill response resources and measures are described in the subsections that follow.

# **10.1 Spill Response Equipment**

Containment materials, including booms and sorbent pads, will be maintained at the OSP and onshore Operations Base in sufficient quantities to contain small to moderate size spills. A spill response equipment list is provided in **Attachment 7**, including location of storage. Response equipment at Mayflower Wind's Operation Base or on the OSP will be maintained and inspected. Specifically, Mayflower Wind will:

- Inspect response equipment listed in **Attachment 7** at least quarterly and maintain, as necessary, to ensure optimal performance;
- Maintain records of the equipment inspections and the maintenance activities (must be retained for two years) (see **Attachment 3** for inspection and maintenance logs); and
- Make available to any authorized BSEE representative the equipment inspection and maintenance records.

Through the OSRO, Mayflower Wind will have access to expanded spill response equipment. The intent of onsite spill response equipment maintained by Mayflower Wind is to provide sufficient supplies for immediate and timely response, while awaiting the arrival of the OSRO.

# **10.2 Containment and Recovery Methods**

The objective of the initial phase of the containment procedure is to prevent the spread of the spill, especially on water, and confine it to as small an area as possible. The containment goals are to prevent liquid vapors from reaching a possible ignition source (e.g., boat engines, electrical equipment) and any environmentally sensitive area (e.g., water, wetland, wildlife management area). The primary methods to be used to contain a release would be absorbents, if on structure (WTG or OSP(s)), or containment booms, if it reaches water. It may be necessary to use many different methods in one release. Containment and recovery refer to techniques that can be employed to contain and recover onshore and aquatic petroleum spills. Responses on water should therefore emphasize stopping the spill, containing the oil near its source, and protecting sensitive areas before such resources are impacted.

Sorbents can be used to remove minor on-water spills on the WTGs and OSP(s). For larger spills, or spills reaching water, booming is used to protect sensitive areas and to position oil so it can be removed with skimmers or vacuum trucks. Due to entrainment, booming is not effective when the water moves faster than one knot, or waves exceed 1.5 feet in height. Angling a boom will minimize entrainment. Using multiple parallel booms will also improve recovery in adverse conditions. A summary of booming techniques for both various scenarios is provided in Section 10.3.2.

### **10.3 Sensitive Resource Protection**

The following summarizes the methods Mayflower Wind will use to protect beaches, seabirds, other wildlife, other marine and shoreline resources, and areas of special economic or environmental importance. The applicable conditions (e.g., sea state, spill size, beach environment, oil type) for the stated methods are also included. Methods used will be compatible with the RI & SEM ACP. The NOAA Characteristic Coastal Habitats: Choosing Spill Response Alternatives<sup>7</sup> (NOAA, 2017) will be used to guide the selection of appropriate response methods. Methods will be selected in consultation with appropriate resource agencies,

<sup>&</sup>lt;sup>7</sup> NOAA. 2017. Characteristic Coastal Habitats: Choosing Spill Response Alternatives. Retrieved from https://response.restoration.noaa.gov/sites/default/files/Characteristic\_Coastal\_Habitats.pdf.

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and the FOSC and will be determined based on the nature and extent of the release and potentially affected resources.

#### 10.3.1 Diversion and Relocation

During conduct of shoreline protection and clean-up operations, efforts would be made to minimize disruptions to wildlife. Table 10-1 presents techniques that could be used to protect wildlife that may be threatened by an oil spill incident. The decision to employ wildlife diversion and relocation efforts will be made by the pre-designated FOSC. As required by the RI & SEM ACP, use of hazing/bird warning systems will be determined on a case-by-case basis through consultation with U.S. Fish & Wildlife Service (USFWS), National Marine Fisheries Service (NMFS) or MassDEP and groups within MassDEP (e.g., National Heritage and Endangered Species Program). Mayflower Wind will strive to protect unaffected and to rescue affected wildlife.

TECHNIQUE	DESCRIPTION
Chumming	Involves the distribution of food to lure birds away from an area affected by an oil spill. Food is dumped into the water from a vessel positioned near the spill site. Once the birds have gathered near the vessel, chumming continues as the vessel moves toward an unaffected area.
Hazing	Involves the use of scare-away guns and/or helicopter overflights to prevent birds from landing on a potentially affected area, or to divert birds from marshes, wetlands, refuges, and other sensitive areas.
Translocation	Involves the transfer of animals to an area unaffected by the spill. Animals are captured and moved to a habitat that fulfills their survival needs and is of sufficient distance from the spill to discourage their return.

#### Table 10-1. Wildlife Protection Techniques

#### 10.3.2 Booming

The primary objective of booming an oil spill is to prevent the oil from spreading and to herd the oil to a collection point where it can be recovered. If a spill is slow moving and remains at the site, a boom (primary) can be deployed to surround the oil. If oil is drifting away from the spill site, boom can be deployed in advance of the movement of the slick. Additional boom (secondary) may be deployed to capture any oil that may spread outside of or move under or over the primary boom. Traditional booms have been shown to be effective in containing oil in relatively still water, however, they are known to be ineffective in waters where currents flow exceeds one knot or high wave turbulence such as the Atlantic Ocean. As such, use within the Mayflower Wind Project may be limited; however, booms may be appropriate for shoreline protection. Newer ocean booms capable of withstanding greater currents and waves may be considered for use in the event of a release to open water.

Moderate and large oil spill incidents could require protection of sensitive surrounding areas. Areas to be protected would be dependent on such things as weather and water conditions at the time of the incident, as well as the quantity of oil spilled. Various booming techniques could be used to contain the spilled oil and to protect the surrounding sensitive areas. Such techniques include:

- Exclusion Booming involves the use of containment and/or sorbent booms to close off and prevent oil from entering sensitive areas. Multiple layers of boom may be required to effectively protect areas. Exclusion booms are used across small bays, harbor entrances, inlets, river or creek mouths where currents are less than one knot and breaking waves are less than 25 cm in height.
- Diversion Booming entails the use of containment or sorbent boom to direct the flow of oil away
  from a sensitive area or toward a preferred collection point. Deployment configurations vary
  depending upon the strength of currents, the location of collection points, the presence and
  configuration of landforms, water flow patterns, the type and length of boom available, the
  availability of anchors, and time. Diversion booms are used on inland streams where currents are

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greater than one knot; across small bays, harbor entrances, inlets, river or creek mouths where currents exceed 1 knot and breaking waves are less than 25 cm, and on straight coastline areas to protect specific sites, where breaking waves are less than 25 cm. Diversion booms may disturb substrate at shoreline anchor points and cause heavy shoreline oil contamination on the downstream end.

- Entrapment (Containment) Booming involves the use of containment and/or sorbent boom to close off impacted areas containing temporarily immobilized oil, and prevent resuspended, mobile oil from moving toward unaffected sensitive areas. Such booming is used on open water to surround an approaching oil slick to protect the shoreline area where surf is present, and the oil slick does not cover a large area. Entrapment booms may disturb substrate at anchoring points.
- Nearshore Trapping involves the use of shallow draft vessels to deploy containment boom and move through thick patches of mobile oil approaching sensitive shoreline areas. Contained oil would be held offshore until it could be recovered by skimming devices.
- Dynamic Skimming involves the use of shallow draft skimming vessels that move through mobile oil approaching sensitive shoreline areas. Lengths of boom are deployed from or out in front of skimming vessels to concentrate oil toward recover devices.
- Passive Collection involves the use of sorbent boom materials that are typically deployed along beach faces, across narrow channels leading to sensitive areas, in front of vegetated, waterfront areas, or in front of or within difficult to clean spaces (i.e., rocky areas) to both exclude oil from and capture oil as it moves through the materials toward a sensitive area. Sorbent materials are replaced when oiled. Passive collection may cause minor disturbance to shoreline at anchor points and is not well suited where surf or chop are present.

## **10.4 Oil and Debris Removal Procedures**

This section discusses procedures to select offshore and shallow water oil and debris removal procedures. As noted previously, the potential magnitude of spills from WTGs or the OSP in the Lease Area is very small. The potential for spill occurrence is limited by: the small quantities of oils, lubricants, and dielectric fluids present; the spatial separation between individual WTGs and the OSP; and the Project containment design and operational procedures. As such, the likelihood of large-scale spill response in offshore or near shore environments is remote.

#### **10.4.1 Offshore Procedures**

The on-water unit is responsible for managing on-water recovery operations. The unit's responsibility includes:

- · Direct, coordinate, and assess effectiveness of on-water recovery actions; and
- Direct, coordinate, and assess effectiveness of subtidal recovery actions.

Recovery options include sorbent materials, vacuum equipment, and skimming devices.

The NOAA Characteristic Coastal Habitats: Choosing Spill Response Alternatives<sup>8</sup> (NOAA, 2017) will be used to guide the selection of appropriate response methods. Response methods include:

- 1. Natural Recovery
- 2. Booming-Containment
- 3. Booming-Deflection/Exclusion
- 4. Skimming
- 5. Physical Herding
- 6. Sorbents

<sup>8</sup>NOAA. 2017. Characteristic Coastal Habitats: Choosing Spill Response Alternatives. Retrieved from https://response.restoration.noaa.gov/sites/default/files/Characteristic\_Coastal\_Habitats.pdf.

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- 7. Debris Removal
- 8. Dispersants
- 9. Emulsion-treating Agents
- 10. Elasticity Modifiers
- 11. Herding Agents
- 12. Solidifiers
- 13. In-situ Burning

The response method selection is based on the type of materials spilled and minimizing impacts to habitat associated with the response technique. Based on the NOAA (2017) guidance, preferred options for diesel fuel and light crudes include options 1 - 4, 7, and 13, above. The NOAA document provides information on each of the above options, including the advantages and disadvantages of each method. The benefits and impacts of response options depend upon incident-specific conditions that may affect the options' suitability for use in a habitat during any spill. Options will be selected in consultation with appropriate resource agencies with selection based on the nature and extent of the spill and potentially affected resources.

Temporary storage for on-water recovery will be secure. Any storage device available will be used, as approved by the UC. All barges or other vessels used for temporary storage must be certified on their Certificate of Inspection (COI) to carry any cargoes containing oil products and/or oily wastes.

#### 10.4.2 Shallow Water Procedures

Based on the NOAA (2017) guidance, the on-land unit is responsible for managing shoreside cleanup operations. The unit's responsibility includes:

- · Direct, coordinate, and assess effectiveness of shoreside recovery actions; and
- Modify protective actions, as needed.

The first step in cleanup is to first consider the relative persistence of the oil. If the product is one that will evaporate or dissipate quickly and naturally, then cleanup measures may not be necessary. If the oil is unlikely to dissipate satisfactorily without human assistance, then cleanup measures must be considered. Environmental, economic, and aesthetic factors must all be considered in determining the desirability and extent of cleanup measures to be initiated. Potential adverse impacts associated with the cleanup activities may outweigh potential impacts of the spilled material.

Shoreline types greatly influence the impacts of oil and cleanup methods and must be considered in each spill. The NOAA ESI predicts rates of removal of stranded oil by natural processes, and ease of cleanup. The ESI shoreline ranks, from least to most sensitive:

- 1. Exposed rocky cliffs and seawalls
- 2. Wave cut rocky platforms
- 3. Fine to medium-grained sand beaches (present)
- 4. Coarse-grained sand beaches (present)
- 5. Mixed sand and gravel beaches
- 6. Gravel beaches/Riprap
- 7. Exposed tidal flats (present)
- 8. Sheltered rocky shores/man-made structures
- 9. Sheltered tidal flats (present)
- 10. Marshes

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Types of shorelines impacted, and degree of impact are important considerations in the selection of preferred response options by shoreline type. Options include the following:

- 1. Natural Recovery
- 2. Manual Removal
- 3. Mechanical Removal
- 4. Passive Collection with Sorbents
- 5. Vacuum
- 6. Debris Removal
- 7. Sediment Reworking/Tilling
- 8. Vegetation Cutting/Removal
- 9. Flooding (deluge)
- Ambient Water Washing: Low Pressure (≤ 50 pounds per square inch [psi]) or High Pressure (>100 psi)
- 11. Warm Water Washing (< 90 degrees Fahrenheit [°F])
- 12. Hot Water Washing (> 90 °F)
- 13. Slurry Sand Blasting
- 14. Solidifiers
- 15. Shoreline Cleaning Agents
- 16. Nutrient Enrichment
- 17. Burning

The NOAA Characteristic Coastal Habitats: Choosing Spill Response Alternatives<sup>9</sup> (NOAA, 2017) will be used to guide the selection of appropriate response methods. This document provides information on each of the above options including advantages and disadvantages of each. The benefits and impacts of response options depend upon incident-specific conditions that may affect the options' suitability for use in a habitat during any spill. Options will be selected in consultation with appropriate resource agencies with selection based on the nature and extent of the spill and potentially affected resources. Preferred options are likely to include options 2 - 6, above.

#### 10.4.3 Dispersant Use and In-Situ Burning Plans

Mayflower Wind does not intend to use dispersants or in-situ burning to address a spill from the Project. The decision to use dispersants will be made by the pre-designated FOSC and executed as directed by the FOSC in a manner consistent with applicable guidelines.

### **10.5** Oil and Debris Disposal Procedures

Oil spill cleanup from recovery operations will involve the further handling of recovered oil and oiled materials. These will be directed to a state-approved reclamation/disposal site.

It is the responsibility of the OSRC/IC to ensure that any spilled oil or hazardous substance is disposed of properly once cleanup has occurred. Disposal will be handled by the OSRO and will occur in a manner consistent with applicable regulatory requirements and the RI & SEM ACP.

<sup>&</sup>lt;sup>9</sup> NOAA. 2017. Characteristic Coastal Habitats: Choosing Spill Response Alternatives. Retrieved from <u>https://response.restoration.noaa.gov/sites/default/files/Characteristic\_Coastal\_Habitats.pdf.</u>

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#### **10.5.1 Classification of Wastes**

In most cases, the waste generated from a recovery operation will be classified as a non-RCRA state regulated waste. In rare instances, where it is suspected that extraneous substances have been introduced into a spill, it is appropriate to test the recovered oil for hazardous waste characteristics (ignitability, reactivity, corrosivity, and toxicity). All these wastes would need to be classified, segregated, and separately transported from the site, and treated and/or disposed of at an approved disposal site(s).

#### **10.5.2 Segregation of Wastes**

A system for managing the segregation of wastes generated during response operations will be established in the field and tailored to the specific response effort. Wastes will be segregated according to type at the time of cleanup to facilitate disposal. Segregation techniques would ensure that:

- · Personnel can readily identify waste materials present in their work areas;
- · Personnel can readily identify waste materials that they are handling;
- Appropriate wastes are transported in proper containment units;
- · Appropriate wastes are shipped to proper temporary storage areas; and
- Appropriate wastes are shipped to proper disposal facilities.

Waste segregation techniques that would be employed include but are not limited to designating specific containers to handle specific wastes; labeling containers; using color-coded poly bags; and/or designating specific areas for the temporary placement of specific wastes.

#### **10.5.3 Storage and Disposal Procedures**

During an oil spill incident, the volume of oil that can be recovered and dealt with effectively would depend on the storage capacity available. Storage methods that would be employed would depend on:

- The type and volume of material to be contained;
- The type of contaminants present, if any;
- The duration of storage;
- The environmental setting;
- The spill site accessibility;
- The time of year; and
- The proximity to human settlements.

Waste generated for Tier 1 oil spills will be temporarily stored at the Operations Base. The majority of these options can be used either on land or on water. Storage containers, such as bags or drums, would be clearly marked, labeled, and/or color-coded to indicate the type of material/waste contained and/or the ultimate disposal option.

#### **10.5.4 Recovered Product**

Portable Frac Tanks will be brought on site to provide temporary storage for recovered product. Recovered oily waste would likely be transported off site for further treatment and/or disposal.

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# **11.0 Wildlife Rehabilitation Procedures**

Resource protection described in Section 10.3 provides the first line of defense for the protection of wildlife. The capture and treatment or rehabilitation of wildlife contaminated by oil is implemented as the last resort for protecting wildlife. Oiled wildlife rehabilitation includes all elements related to capture, handling, transportation, stabilization, cleaning, care, holding, and release. The goal of a capture and treatment effort is the release of healthy wildlife back into their natural environment.

The decision to initiate such an effort must consider incident-specific criteria. The criteria must be based on the best available science and focus on the protection and maintenance of healthy wild populations of the species affected by the spill. Considerations for initiating an oiled wildlife capture and treatment program include condition of the animal, weather, oil toxicity, time, species of animal, extent of oiling, care in captivity, location of treatment, available care, facility, release, zoonotic diseases, permits and euthanasia. There is no protocol available for capture, cleaning and treatment of oiled fish.

As noted elsewhere, the likelihood of a large-scale spill from the Mayflower Wind Project affecting wildlife is very small. Wildlife rehabilitation will be undertaken only after consultation with appropriate wildlife and environmental agencies (including MassDEP, Mass Division of Fish & Wildlife, NMFS, and US Fish & Wildlife Service). Mayflower Wind will contract a firm with expertise in wildlife rescue and rehabilitation to oversee and conduct wildlife rehabilitation.

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# **12.0** Training and Drills

Training and drills are an essential component of the OSRP to prepare personnel to respond to an actual event. Facility response training, drills/exercises, personnel response training, and spill prevention meetings in this section comply with the requirements of 30 CFR 254.41. Per 30 CFR 254.41(d), training certificates and training attendance records must be maintained in a designated location for at least two years. Mayflower Wind will maintain documentation of training at the Operations Base. As is required, training records will be made available to any authorized BSEE representative upon request.

Training and Drills forms used to document inspections, drills and training are included in Attachment 8.

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## **ATTACHMENTS**

## Attachment 1 WTG/OSP Locations in Lease Area

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Note:

MLLW = mean lower low water

MSIR = Marine Site Investigation Report

#### Figure A-1. Lease Area Structure Locations

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# Attachment 2 OSRO Contract

[Placeholder - Contract will be added when contractor is selected]

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Attachment 3 Forms and Checklists

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INCIDENT RESPONSE CHEC	KLIST
Action	Comments
First Person on Scene	
Take personal protective measures (including donning of PPE and/or establishing safe distance from threat)	
Identify and control source if possible (close valve, turn off pump, deactivate system). Eliminate ignition sources.	
Activate local alarms and evacuate non-essential personnel.	
Notify the On-Duty Operations Supervisor.	
Warn personnel in the area and enforce safety and security measures.	
If possible, implement countermeasures to control the emergency. If personal health and safety is not assured, do not attempt to reenter the emergency site.	
Designate a staging area where the Emergency Response personnel and equipment can safely report to without becoming directly exposed to the emergency release (until QI arrives).	
On-Duty Operations Supervisor	
Assume role of Oil Spill Response Coordinator/Qualified Individual pending arrival of the QI onsite.	
Initiate defensive countermeasures and safety systems to control the emergency (booms, sorbent material, loose dirt, sandbags, or other available materials). Eliminate ignition sources.	
Initiate Emergency Response notification system.	
Dispatch response resources as needed.	
Monitor and or facilitate emergency communications.	
Keep the public a safe distance from the release.	
QI or Designee	
Notify Federal, state and local agencies.	
Establish On-Scene Command and respond to the Command Post.	
Assess situation and classify incident.	
Perform air monitoring surveys prior to entering a release area.	
Determine extent and movement of the release.	
Identify sensitive areas and determine protection priorities.	
Request additional or specialized response resources.	
Establish Isolation Zones (Hot, Warm, Cold) and Direct On- Scene Response Operations	
Coordinate initial regulatory notifications and external contacts.	
Keep the public a safe distance from the release.	

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INCIDENT BRIEFING FORM			
Date:	Time:		
INCIDENT DESCRIPTION			
Reporters Name:	Position:		
Reporters Phone Number:	Address:		
Company:	-		
Company.			
Latitude:	Longitude:		
Date of Incident:	Time of Incident:		
Spill/Incident Location:	Source and/or Cause of spill/incident:		
Material spilled and total volume:	Vessel Name and Number (if applicable):		
Is the material spilled in water?	Is the source secured?		
Weather conditions:	Precipitation?		
Incident Description:			
Name of Incident Commander:	Where is the Incident Command Post (directions)?		
RESPONSE ACTIONS			
Actions taken to correct, control or mitigate incident:			
Number of injuries:	Number of deaths:		
Were there evacuations?	Number of evacuated:		
Areas affected:	Damage estimate:		
Any other information about impacted medium:			
CALLER NOTIFICATIONS			
□ National Response Center (NRC): +1 (800) 424-8802	<ul> <li>NRC Incident Assigned Number:</li> <li>+ 1 (800) 424-8802</li> </ul>		
□ MassDEP: +1 (800) 832-8224			
Other Agencies Notified: USCG □ EPA □ OSHA □ USFWS □ MassDEP □ Other (specify)			
Other information not recorded elsewhere:			

Note: Do Not Delay Notifications Pending Collection of All Information. Notify within 1 hour of discovery.

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Incident Number: \_\_\_\_\_

Document all information that agencies request.

AGENCY CALL B	ACK INFORMATION
Date:	Time:
Agency:	Person Contacted:
Reason for Call Back:	
Document all dialogue with agency below:	

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# Incident No.\_\_\_\_\_

Document all events chronologically.

Date/Time	Record of Event

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INCIDENT REPORT FORM			
Incident #:			
Reviewed by:	Final Date:		
☐ Attach Initial Notification Form for basic data,	update as incident progresses.		
Incident Duration (dates and time):	Type and Location of Incident:		
Categorical Level of Incident and what portions of response team were assembled? Identify all leader positions and names.	Does the incident create a potential compliance issue? If yes, describe.		
Material released:	Final released volume:		
Were there any abnormal operating conditions immediately before the emergency? If yes, describe.	Were there any equipment problems or changes immediately before the emergency? If yes, describe.		
Description of media impacted:	Was all media cleaned up to satisfaction of regulatory agencies?		
Type and volume of waste generated: (attach waste tracking log if applicable)	How and where was waste disposed or recovered?		
Were all spilled materials recovered? If not, desc	ribe what was not recovered and why.		

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INCIDENT REPORT FORM			
Provide description of clean-up methods utilized:			
Describe decontamination procedures and includ	e pieces of equipment decontaminated.		
Has stock of emergency equipment been replenished to pre-incident conditions?	Date demobilization was completed.		
Describe what worked and did not work during in	cident:		
Recommendations for improvement:			

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SECONDARY CONTAINMENT INSPECTION CHECKLIST			
Area(s) Inspected:	Date/Time:	Inspected By:	
Inspection Item	Acceptable (Y/N)	Comments/Corrective Action	
Level of precipitation in containment			
Presence of spilled or leaked material			
Operational status of drainage valves			
Debris			
Location/status of pipes, inlets, drainage			
Cracks			
Discoloration			
Corrosion			
Valve conditions			

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ROUTINE CHECKLIST AND INSPECTION FORM			
Tank(s) Inspected:	Date/Time:	Inspected By:	
Inspection Item	Acceptable (Y/N)	Comments/Corrective Action	
Emergency Generator (Day Tank and Lubrication Oils)			
Diesel Tank			
Platform Crane			
Power Transformers			
Reactors			
Auxiliary/Earthing Transformers			
Wind Turbine Generators			

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	EQUIPMENT INSPECTION LOG			
Inspector	Date	Equipment	Comments	

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	RESPONSE EQUIPMENT MAINTENANCE LOG			
Date	Equipment	Maintenance Performed		

This may be maintained on computer log or paper but kept on-site. Include description of maintenance activities performed (i.e., repaired boat motor, gate valves lubricated, booms cleaned, etc.).

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Attachment 4 External Contact List

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Agency	Location	Telephone		
Initial Required Notifications				
National Response Center	c/o USCG (CG-3RPF-2) 2100 2nd Street Southwest Room 2111-B Washington, D.C. 20593-0001	+1 (800) 424-8802 (24 hr.) +1 (202) 267-2675 (24 hr.) +1 (202) 267-1322 (fax)		
Massachusetts State Emergency Response Commission (SERC)	Massachusetts Emergency Management Agency (MEMA) 400 Worcester Road Framingham, MA 01702	+1 (508) 820-2010		
U.S. Coast Guard (any discharge on navigable water)	408 Atlantic Avenue Boston, MA 02110	+1 (617) 223-4812 or +1 (617) 406-9011		
MassDEP (10 gal or more)	1 Winter Street Boston, MA 02108	+1 (888) 304-1133		
EPA Region 1 (>5 barrels on land or any amount on water)	5 Post Office Square Boston, MA 02109	+1 (888) 372-7341 or +1 (617) 918-1251		
Bureau of Safety and Environmental Enforcement (BSSE)	1201 Elmwood Park Boulevard New Orleans, LA 70123-2394	+1 (504) 736-2595 or +1 (504) 400-7836		
Dukes County REPC (Threat to Martha's Vineyard)	32 Water Street Tisbury, MA 02568	+1 (508) 696-4240		
Wampanoag Tribe of Gay Head (Aquinnah) (Threat to tribal lands on MV)	20 Black Brook Road Aquinnah, MA 02535	+1 (508) 645-9265		
Mashpee Wampanoag Tribe of Massachusetts (Threat to tribal lands on Cape Cod)	483 Great Neck Road South Mashpee, MA 02649			
Chappaquiddick Wampanoag Tribe (Threat to tribal lands on MV)	P.O. Box 2659 Edgartown, MA 02539			
Barnstable County REPC (Threat to Nantucket)	3195 Main Street Barnstable, MA 02630	+1 (508) 375-6908		
OSHA (fatality or 3 or more employees sent to hospital)	200 Constitution Avenue Washington, D.C. 20210	+1 (800) 321-6742		
	Aviation Resources			
Mayflower Wind has not selected avia for this resource will be provided here http://www.aircharterguide.com/US_C	. A list of Massachusetts charter ope			
	Marine Resources			
Steamship Authority	1 Cowdry Road Woods Hole, MA 02543	+1 (508) 548-5011		

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Attachment 5 Technical Expertise Contact Information

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Agency/Organization	Location	Telephone
General		
Massachusetts Emergency Management Agency	Framingham, MA (HQ) Bridgewater, MA	508-820-2000 (HQ) 508-427-0400 (Region 2)
American Red Cross Regional Headquarters Southeast Headquarters	Cambridge, MA Hyannis, MA	617-274-5200 (MA) 508-775-1540 (CC&I)
Ecological Resources		
Provincetown Center for Coastal Studies	Provincetown, MA	508-487-3622
National Marine Life Center	Buzzards Bay, MA	508-743-9888
Cape Wildlife Center	Barnstable, MA	508-362-0111 After hours: 617.835.6845
International Fund for Animal Welfare		508-744-2271
Barnstable County Regional Emergency Planning Committee		508-375-6618
Commercial Fishing		
Novigation		
Navigation		

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Attachment 6 Safety Data Sheets

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#### **Reserved for SDS**

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Attachment 7 Spill Response Equipment

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Placeholder for list of Spill Response Materials to be maintained at the Operations Base and on the OSP.

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Attachment 8 Training and Drills

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The regulations governing Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (30 CFR 254.42) require that Mayflower Wind exercise the response personnel and equipment. This includes exercising the entire response plan at least once every three years. This requirement may be satisfied by conducting separate exercises for individual parts of the plan over the 3-year period.

The 3-year exercise requirement will include:

- (1) An annual spill management team tabletop exercise. The exercise will test the spill management team's organization, communication, and decision-making in managing a response. The spill scenario will not be revealed to team members before the exercise starts.
- (2) An annual deployment exercise of response equipment identified in your plan that is staged at onshore locations. The exercise must deploy and operate <u>each type</u> of equipment in each triennial period. However, it is not necessary to deploy and operate each individual piece of equipment.
- (3) An annual notification exercise for each facility that is manned on a 24-hour basis. The exercise will test the ability of facility personnel to communicate pertinent information in a timely manner to the qualified individual.
- (4) A semiannual deployment exercise of any response equipment which the BSEE Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels. Each type of this equipment will be deployed and operated at least once each year. Each type need not be deployed and operated at each exercise.

The exercises will simulate conditions in the area of operations, including seasonal weather variations, to the extent practicable. The exercises must cover a range of scenarios over the 3- year exercise period, simulating responses to large continuous spills, spills of short duration and limited volume, and your worst-case discharge scenario. Exercises may be completed as part of other required training or other drill/exercise requirements.

BOEM recognizes and gives credit for any documented exercise conducted that satisfies some part of the required triennial exercise, whether the owner or operator, an OSRO, or a Government regulatory agency initiates the exercise. BOEM will give you credit for an actual spill response if you evaluate the response and generate a proper record. Exercise documentation should include the following information:

- 1. Type of exercise;
- 2. Date and time of the exercise;
- 3. Description of the exercise;
- 4. Objectives met; and
- 5. Lessons learned.

All records of spill-response exercises will be maintained for the complete 3-year exercise cycle. Records should be maintained at the facility or at a corporate location designated in the plan. Records showing that OSRO's and oil spill removal cooperatives have deployed each type of equipment also will be maintained for the 3-year cycle.

Mayflower Wind will inform the Regional Supervisor of the date of any required exercise at least 30 days before the exercise. This will allow BSEE personnel the opportunity to witness any exercises.

The Regional Supervisor periodically will initiate unannounced drills to test the spill response preparedness of owners and operators.

The Regional Supervisor may require changes in the frequency or location of the required exercises, equipment to be deployed and operated, or deployment procedures or strategies. The Regional Supervisor

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may evaluate the results of the exercises and advise the owner or operator of any needed changes in response equipment, procedures, or strategies.

Compliance with the National Preparedness for Response Exercise Program (PREP) Guidelines will satisfy the exercise requirements of this section. Copies of the PREP document may be obtained from the Regional Supervisor.

Records of the above exercises, including a log providing a description of the exercise, the date of the exercise, and participants, will be kept on file at the Operations Base.

Sample forms are provided at the end of this Attachment.

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EQUIPMENT DEPLOYMENT DRILL DOCUMENTATION FORM			
SECTION I: DRILL INFORMATION			
FACILITY NAME:			
PREPARED BY:			
DATE OF DRILL:TIME DRILL STARTED:			
TIME DRILL COMPLETED:			
CHECK WHETHER THIS IS A FACILITY DRILL, A CORPORATE DRILL OR BOTH. ALSO CHECK WHETHER DRILL IS ANNOUNCED OR UNANNOUNCED.			
FACILITY: CORPORATE:			
FACILITY:       CORPORATE:         ANNOUNCED:       UNANNOUNCED:			
IS DRILL IN CONJUNCTION WITH OTHER EXERCISE?YESNO IF YES, WHAT TYPE OF DRILL			
IS THIS AN EXERCISE OR ACTUAL RESPONSE?			
ATTACH DRILL SCENARIO(S) IF APPROPRIATE			
SECTION II: DRILL OBJECTIVES			
CHECK EACH OBJECTIVE DEMONSTRATED DURING THE DRILL DEMONSTRATE ABILITY OF RESPONSE TEAM TO ORGANIZE IN ACCORDANCE WITH THE RESPONSE PLAN ENSURE EQUIPMENT IS IN PROPER WORKING ORDER			
DEMONSTRATE ABILITY OF RESPONSE PERSONNEL TO DEPLOY AND OPERATE EQUIPMENT			
USE THE INITIAL INCIDENT BRIEFING FORM IN ATTACHMENT C TO ASSIST IN DOCUMENTING APPROPRIATE DRILL INFORMATION.			
THE FOLLOWING EQUIPMENT MUST BE DEPLOYED. 1000 FEET OF EACH TYPE OF BOOM IN INVENTORY AND ONE OF EACH TYPE OF SKIMMING SYSTEM.			
DESCRIBE GOALS OF EXERCISE (ATTACH LIST OF EQUIPMENT DEPLOYED AND BOOMING STRATEGIES):			
LIST EACH TYPE OF EQUIPMENT DEPLOYED, WHERE IT WAS DEPLOYED AND OPERATIONAL STATUS. EQUIPMENT TYPE LOCATION OPERATIONAL LIST NO. OF SUPPORT PERSONNEL			
EQUIFIVIENT ITTE LOCATION OFERATIONAL LISTING. OF SUPPORT PERSONNEL			

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EQUIPMENT DEPLOYMENT DRILL DOCUMENTATION FORM			
SECTION III: DRILL EVALUATION & RESULTS			
THE FOLLOWING QUESTIONS WII ANSWER REQUIRES A COMMENT)	LL BE COMPLETED BY THE DRILL EVALUATOR (A NO		
1. DID RESPONSE TEAM ORGANIZ YESNO	E AND IMPLEMENT THE INCIDENT COMMAND SYSTEM?		
	ONSTRATE THEIR ABILITY TO DEPLOY AND OPERATE OPERATING ENVIRONMENT?YESNO		
3. DID THE EQUIPMENT OPERATE	PROPERLY?YESNO		
EVALUATOR'S SUMMARY (PROVID LEARNED, ISSUES REQUIRING RES	DE COMMENTS RELATIVE TO OBJECTIVES, LESSONS SOLUTION, ETC.)		
COMMENTS CAN BE PROVIDED BE	LOW OR AS AN ATTACHMENT:		
NAME OF EVALUATOR:			
SECTIO	N IV: DRILL CERTIFICATION		
	OMPLETED, THAT THE RESPONSE PLAN OBJECTIVES AS EXERCISED AND THAT THE DRILL WAS EVALUATED IN IIDELINES.		
PRINT NAME	PRINT TITLE		
SIGNATURE	DATE		

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EMERGENCY PROCEDURES EXERCISE DOCUMENTATION FORM (OPTIONAL)			
(i) SECTION I: DRILL INFORMATION			
FACILITY NAME:			
PREPARED BY: TIME DRILL STARTED:			
PREPARED BY:TIME DRILL STARTED: DATE OF DRILL:TIME DRILL COMPLETED:			
CHECK WHETHER THIS IS A FACILITY DRILL, A CORPORATE DRILL OR BOTH. ALSO CHECK			
WHETHER DRILL IS ANNOUNCED OR UNANNOUNCED.			
FACILITY:        CORPORATE:			
ANNOUNCED: UNANNOUNCED:			
IS DRILL IN CONJUNCTION WITH OTHER EXERCISE?YESNO			
IS THIS AN EXERCISE OR ACTUAL RESPONSE? CHECK TYPE OF EMERGENCY PROCEDURES EXERCISE			
TRANSFER EQUIPMENT FAILURE (PUMPS, HOSES, VALVES, MANIFOLD, ETC.)			
TANK OVERFLOWTANK FAILURE			
ATTACH DRILL SCENARIO(S) IF APPROPRIATE			
(ii) SECTION II: DRILL OBJECTIVES			
CHECK EACH OBJECTIVE DEMONSTRATED DURING THE DRILL			
EXERCISE FACILITY'S EMERGENCY PROCEDURES TO ONE OR MORE OF THE			
ABOVE EMERGENCIES TO ENSURE PERSONNEL KNOWLEDGE OF			
ACTIONS TO BETAKEN TO MITIGATE A SPILL (CAN BE A WALK-			
THROUGH OF EMERGENCY PROCEDURES).			
EXERCISE SHOULD INVOLVE ONE OR MORE SECTIONS OF EMERGENCY			
PROCEDURES FOR SPILL MITIGATION (EXERCISE SHOULD INVOLVE			
A SIMULATION OF RESPONSE TO AN OIL SPILL). Note: FACILITY			
SHOULD ENSURE THAT SPILL MITIGATION PROCEDURES FOR ALL			
CONTINGENCES ARE ADDRESSED AT SOME TIME.			
USE THE CORPORATE PLAN RESPONSE MANAGEMENT FORMS TO ASSIST IN			
DOCUMENTING APPROPRIATE DRILL INFORMATION			
DESCRIBE EXERCISE:			

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SECTION III: DRILL EVALUATION & RESULTS			
COMPLETE ONLY THE QUESTIONS WHICH APPLY. QUESTIONS WILL BE COMPLETED BY			
THE DRILL EVALUATOR (A NO ANSWER REQUIRES A COMMENT)			
1. WERE APPROPRIATE INTERNAL AND EXTERNAL NOTIFICATIONS CONDUCTED?			
2. DID RESPONSE TEAM MOBILIZE TO THE SITE WITHIN A REASONABLE TIME?			
YESNO			
3. DID THE INCIDENT COMMAND SYSTEM FUNCTION SUCCESSFULLY DURING THE RESPONSE?			
YESNO			
4. HOW DID THE RESPONSE TEAM DEMONSTRATE EMERGENCY SHUTDOWN AND DISCHARGE CONTROL?			
YESNO			
5. WAS A DETAILED ASSESSMENT OF THE DISCHARGE CONDUCTED?			
6. WAS ADEQUATE DISCHARGE CONTAINMENT DEMONSTRATED?			
YESNO			
7. WAS RECOVERY OF SPILLED MATERIAL DEMONSTRATED?			
YESNO			
8. WERE CONTAINMENT BOOMS PROPERLY PLACED TO PROTECT ECONOMICALLY/ENVIRONMENTALLY SENSITIVE AREAS?			
9. WERE EMERGENCY PROCEDURES PROPERLY DEMONSTRATED?			
YESNO			
EVALUATOR'S SUMMARY (PROVIDE COMMENTS RELATIVE TO OBJECTIVES, LESSONS LEARNED, ISSUES REQUIRING RESOLUTION, ETC.) COMMENTS CAN BE PROVIDED BELOW OR AS AN ATTACHMENT.			
NAME OF EVALUATOR:			
SECTION IV: DRILL CERTIFICATION			
I CERTIFY THAT THE DRILL WAS COMPLETED. THAT THE RESPONSE PLAN OBJECTIVES AS			
INDICATED IN SECTION II WERE EXERCISED AND THAT THE DRILL WAS EVALUATED IN			
ACCORDANCE WITH THE PREP GUIDELINES.			
PRINT NAME PRINT TITLE			
SIGNATURE DATE			

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OSIC/QI NOTIFICATION DRILL DOCUMENTATION FORM			
SECTION I: DRILL INFORMATION			
FACILITY NAME:PREPARED BY:			
TIME DRILL STARTED:TIME DRILL COMPLETED: DATE OF DRILL:			
IS DRILL IN CONJUNCTION WITH OTHER EXERCISE?YESNO IF YES, WHAT TYPE OF DRILL IS THIS AN EXERCISE OR ACTUAL RESPONSE?	-		
SECTION II: DRILL OBJECTIVES			
CHECK EACH OBJECTIVE DEMONSTRATED DURING THE DRILL. DEMONSTRATE THE ACCESSIBILITY AND NOTIFICATION CAPABILITY OF THE: QUALIFIED INDIVIDUAL MEMBERS OF THE RESPONSE TEAM (OPTIONAL) LIST PERSONNEL CONTACTED ON THE ATTACHED SHEET DESCRIBE NOTIFICATION PROCEDURE			
SECTION III: DRILL EVALUATION & RESULTS			
THE FOLLOWING QUESTIONS WILL BE COMPLETED BY THE DRILL EVALUATOR (A NO ANSWER REQUIRES A COMMENT)  1. WAS CONTACT MADE WITH THE OSIC/QI OR ALTERNATE WITHIN A REASONABLE PERIOD OF TIME?YESNO  2. WAS CONTACT MADE WITH THE MAJORITY OF THE RESPONSE TEAM WITHIN A REASONABLE PERIOD OF TIME (OPTIONAL)?YESNO  2. VAS CONTACT MADE WITH THE MAJORITY OF THE RESPONSE TEAM WITHIN A REASONABLE PERIOD OF TIME (OPTIONAL)?YESNO  2. VAS CONTACT MADE WITH THE MAJORITY OF THE RESPONSE TEAM WITHIN A REASONABLE PERIOD OF TIME (OPTIONAL)?YESNO  EVALUATOR'S SUMMARY (PROVIDE COMMENTS RELATIVE TO OBJECTIVES, LESSONS LEARNED, ISSUES REQUIRING RESOLUTION, ETC.) COMMENTS CAN BE PROVIDED BELOW OR AS AN ATTACHMENT: Changes to be implemented: Timetable for implementation: NAME OF EVALUATOR:			
SECTION IV: DRILL CERTIFICATION			
I CERTIFY THAT THE DRILL WAS COMPLETED, THAT THE RESPONSE PLAN OBJECTIVES AS INDICATED IN SECTION II WERE EXERCISED AND THAT THE DRILL WAS EVALUATED IN ACCORDANCE WITH THE PREP GUIDELINES.			
PRINT NAME PRINT TITLE			

SIGNATURE

DATE

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NOTIFICATION FORM			
ON-SCENE COMMANDER/QUALIFIED INDIVIDUAL			
NAME	DATE CONTACTED	TIME CONTACTED	CONTACT METHOD (SEE BELOW)
	RESPONSE	TEAM MEMBER	S (OPTIONAL)

Contact Method:

T - TELEPHONE R - RADIO M - MESSAGE-PAGER F - FACSIMILE O - LIST METHOD

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SPILL MANAGEMENT TEAM TABLETOP EXERCISE DOCUMENTATION FORM			
SECTION I: DRILL INFORMATION			
FACILITY NAME: QUALIFIED INDIVIDUAL:			
PREPARED BY: TIME DRILL STARTED: DATE OF DRILL: TIME DRILL COMPLETED:			
IS DRILL IN CONJUNCTION WITH OTHER EXERCISE? YES NO			
IF YES, WHAT TYPE OF DRILL			
IS THIS AN EXERCISE OR ACTUAL RESPONSE?			
RESPONSE PLAN SCENARIO USED (CHECK ONE):			
MAXIMUM MOST PROBABLE DISCHARGE WORST CASE DISCHARGE			
SIZE OF (SIMULATED) SPILL BBLS/GALS			
ATTACH COPY OF DRILL SCENARIO			
SECTION II: DRILL OBJECTIVES			
CHECK EACH OBJECTIVE DEMONSTRATED DURING THE DRILL			
KNOWLEDGE OF RESPONSE PLAN.			
PROPER NOTIFICATIONS MADE.			
EFFECTIVENESS OF COMMUNICATION SYSTEM.			
ABILITY TO ACCESS AN OSRO.			
COORDINATION OF INTERNAL RESPONSE PERSONNEL.			
ANNUAL REVIEW OF THE TRANSITION FROM LOCAL TEAM TO CORPORATE TEAM.			
COORDINATE TO EFFECTIVELY COORDINATE SPILL RESPONSE ACTIVITY WITH THE NATIONAL RESPONSE SYSTEM INFRASTRUCTURE.			
ABILITY TO ACCESS INFORMATION IN AREA CONT. PLAN FOR LOCATION OF SENSITIVE AREAS AND RESOURCES.			
USE THE CORPORATE PLAN RESPONSE MANAGEMENT SYSTEM FORMS TO ASSIST IN DOCUMENTING APPROPRIATE DRILL INFORMATION.			
DESCRIBE EXERCISE:			

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SECTION III: DF	RILL EVALUATION & RESULTS			
THE FOLLOWING QUESTIONS WILL BE COMPLETED BY THE DRILL EVALUATOR. DESCRIBE HOW THE FOLLOWING OBJECTIVES WERE EXERCISED: 1. TEAM'S KNOWLEDGE OF THE RESPONSE PLAN:				
2. CONDUCTING APPROPRIATE INTER	NAL AND EXTERNAL NOTIFICATIONS:			
3. USE OF COMMUNICATIONS SYSTEM	M IN SUPPORT OF RESPONSE OPERATIONS:			
4. TEAM'S ABILITY TO ACCESS FPL, ORGANIZATIONS (IF APPLICABLE):	, AGENCY AND CONTRACTED OIL SPILL REMOVAL			
5. TEAM'S ABILITY TO COORDINATE S AND STATE AGENCIES (IF APPLICABLE	SPILL RESPONSE WITH ON-SCENE COORDINATOR,			
6. TEAM'S ABILITY TO ACCESS SENSITIVE SITE AND RESOURCE INFORMATION IN THE AREA CONTINGENCY PLAN:				
EVALUATOR'S SUMMARY (PROVIDE ( LEARNED, ISSUES REQUIRING RESOL COMMENTS CAN BE PROVIDED BELOV				
Changes to be implemented: Timetable for implementation <u>:</u> NAME OF EVALUATOR:				
SECTION IV: DRILL CERTIFICATION				
	HAT THE RESPONSE PLAN OBJECTIVES AS INDICATED IN RILL WAS EVALUATED IN ACCORDANCE WITH THE PREP			
PRINT NAME	PRINT TITLE			
SIGNATURE	DATE			

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EXERCISE ENTIRE RESPONSE PLAN DOCUMENTATION FORM			
SECTION I: DRILL INFORMATION			
FACILITY NAME:			
PREPARED BY:			
DATE OF DRILL:			
CHECK WHETHER THIS DOCUMENTATION IS IN SUPPORT OF A FACILITY PLAN OR THE CORPORATE PLAN OR BOTH.			
FACILITY: CORPORATE:			
SECTION II: DRILL OBJECTIVES			
INDICATE THE DATE EACH OBJECTIVE WAS DEMONSTRATED DURING THE TRIENNIAL PERIOD			
DATE OBJECTIVES (FACILITY & CORPORATE TEAM)			
ORGANIZATIONAL DESIGN			
CONDUCT NOTIFICATIONS			
MOBILIZE RESPONSE TEAM			
IMPLEMENT UNIFIED COMMAND/RESPONSE MGT. SYSTEM			
STOP DISCHARGE FROM OCCURRING (DISCHARGE CONTROL)			
CONDUCT AN ASSESSMENT OF DISCHARGE			
DEMONSTRATE DISCHARGE CONTAINMENT CONDUCT RECOVERY OF SPILLING MATERIAL			
DEMONSTRATE PROTECTION OF ECONOMICALLY/			
ENVIRONMENTALLY SENSITIVE AREAS			
DEMONSTRATE DISPOSAL OF RECOVERED PRODUCT			
RESPONSE SUPPORT			
DEMONSTRATE ABILITY TO MAINTAIN/SUPPORT ALL EQUIPMENT			
DOCUMENT OPERATIONAL AND SUPPORT ASPECTS OF RESPONSE			
(CORPORATE TEAM ONLY)			
ESTABLISH INTERNAL/EXTERNAL COMMUNICATION SYSTEMS			
DEMONSTRATE MULTI-MODE TRANSPORTATION SUPPORT			
DEMONSTRATE ABILITY TO PROVIDE PERSONNEL SUPPORT			
DEMONSTRATE PROCUREMENT OF RESOURCES			
USE THE CORPORATE PLAN RESPONSE MANAGEMENT FORMS TO ASSIST IN DOCUMENTING APPROPRIATE DRILL INFORMATION			

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SECTION III: DRILL EVALUATION & RESULTS			
THE FOLLOWING QUESTIONS WILL BE COMPLETED BY THE DRILL EVALUATOR (A NO ANSWER REQUIRES A COMMENT)			
1. WERE APPROPRIATE INTERNAL AND EXTERNAL NOTIFICATIONS CONDUCTED?			
2. DID RESPONSE TEAM MOBILIZE TO THE SITE WITHIN A REASONABLE TIME?			
3. DID THE INCIDENT COMMAND SYSTEM FUNCTION SUCCESSFULLY DURING THE RESPONSE?			
4. HOW DID THE RESPONSE TEAM DEMONSTRATE DISCHARGE CONTROL?			
5. WAS A DETAILED ASSESSMENT OF THE DISCHARGE CONDUCTED? YESNO			
6. WAS ADEQUATE DISCHARGE CONTAINMENT DEMONSTRATED?			
7. WAS RECOVERY OF SPILLED MATERIAL DEMONSTRATED? YESNO			
8. WERE CONTAINMENT BOOMS PROPERLY PLACED TO PROTECT ECONOMICALLY/ ENVIRONMENTALLY SENSITIVE AREAS? YESNO			
9. WAS PROPER DISPOSAL OF RECOVERED PRODUCT DEMONSTRATED? YESNO			

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10. IS EQUIPMENT PROPERLY MAINTAINED?			
YESNO			
11. WAS ADEQUATE DOCUMENTATION OF DRILL EVENTS CONDUCTE	ED?		
12. DID THE COMMUNICATION SYSTEM ADEQUATELY SUPPORT RESP YESNO	PONSE OPERATIONS?		
13. WERE TRANSPORTATION SUPPORT NEEDS MET?			
14. WAS ADEQUATE PERSONNEL PROVIDED TO STAFF THE RESPON	SE ORGANIZATION?		
15. HOW DID THE TEAM DEMONSTRATE PROCUREMENT OF RESOU	RCES?		
EVALUATOR'S SUMMARY (PROVIDE COMMENTS RELATIVE TO OB LEARNED, ISSUES REQUIRING RESOLUTION, ETC.) COMMENTS CAN BE PROVIDED BELOW OR AS AN ATTACHMENT:	JECTIVES, LESSONS		
SECTION IV: DRILL CERTIFICATION			
I CERTIFY THAT THE DRILL WAS COMPLETED, THAT THE RESPONSE I INDICATED IN SECTION II WERE EXERCISED AND THAT THE DRILL ACCORDANCE WITH THE PREP GUIDELINES.			
PRINT NAME PRINT TITLE			
SIGNATURE DATE			

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OIL SPILL RESPONSE TRAINING – ATTENDANCE RECORD			
DATE	COURSE TITLE/ SPILL PREVENTION BRIEFING ISSUES	INSTRUCTORS	AFFILIATION
START DATE:		1.	
FINISH DATE:		2.	
TOTAL HOURS:		3.	

NAME (please print)	NAME (signature)	JOB TITLE	WORK LOCATION SYMBOL

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