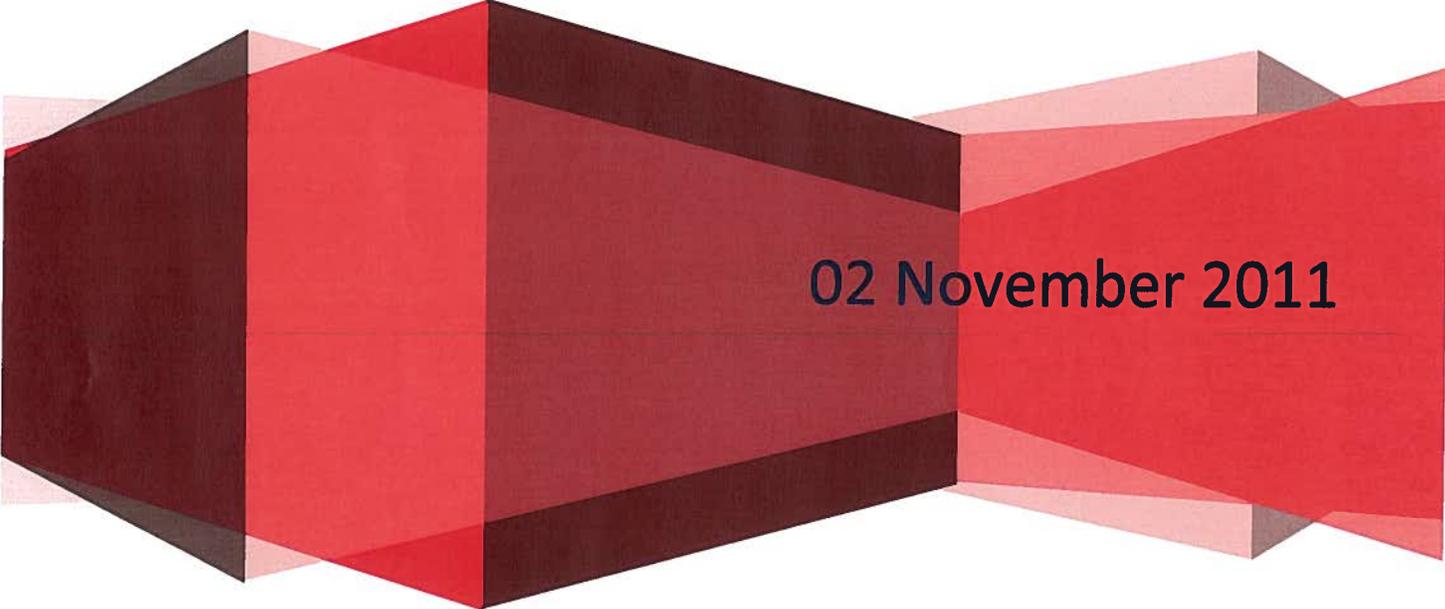


Unified Command

Deepwater Horizon Shoreline Clean-up Completion Plan (SCCP)

Unified Command - SCCP Core Group



02 November 2011

Table of Contents

Record of Revisions.....	4
Approvals	4
1. Introduction	5
2. Objectives.....	6
3. Changing P&M Frequencies of Stage 4 STRs.....	6
3.1. Process Steps	8
3.2. Tracking Changes in P&M Frequency	10
3.3. Environmental Compliance.....	10
4. Determining Segments to Receive Post Hurricane Season Inspections	10
5. Shoreline Clean-up Endpoints.....	12
6. Conditions Necessary for Segments to be Deemed that Removal Actions are Complete	16
7. Exceptions to the Process	20
8. SCAT Team Composition and Notification Requirements	20
8.1. Team Composition	20
8.2. Notifications.....	21
9. Acronyms	21
10. Attachments.....	23
Attachment 1 - Core Group Listing	24
Attachment 2 – Frequency Request Change Cover Sheet (Illustrative).....	25
Attachment 3 – Change of Patrol Frequency Request Approval Form (Illustrative)	26
Attachment 4 - State of Florida Procedures for Frequency Change.....	27
Attachment 5 - State of Alabama Procedures for Frequency Change.....	28
Attachment 6 - State of Mississippi Procedures for Frequency Change.....	29
Attachment 7 - State of Louisiana Procedures for Frequency Change.....	30
Attachment 8 – Louisiana Change Form (Illustrative)	34
Attachment 9 – PIST Form (Illustrative).....	35
Attachment 10 – SIR Form (Illustrative).....	36
Attachment 11 – USCG Directive	37
Attachment 12– Background Oiling.....	39

Figures

Figure 1 – Frequency Change Process 8
Figure 2 – Shoreline Clean-up Completion Process 19

Tables

Table 1 – Shoreline Clean-up Endpoints Eastern States 12
Table 1 Continued – Shoreline Clean-up Endpoints Eastern States 13
Table 2 – Endpoints for Sand Beaches in Louisiana 14
Table 3 – Endpoints for Coastal Marshes and Mangroves 15
Table 4 – Endpoints for Man-made Structural Shorelines..... 15

Record of Revisions

Change Date	Page Numbers		Description of Change
	Removed	Inserted	

Approvals

ICS Position	Name	Signature	Date
Environmental Section Chief	GARY HAYWARD	<i>Gary Hayward / for John Nequedg</i>	11/2/11
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Shoreline Clean-up Completion Plan

1. Introduction

The purpose of this Shoreline Clean-up Completion Plan (Plan) is to define a process to deem that removal actions are complete on each shoreline segment within this response in a manner consistent with and documented by the Shoreline Clean-up Assessment Technique (SCAT) process. The shoreline clean-up processes as identified within this Plan have been developed to ensure that appropriate shoreline clean-up activities have been conducted. The Plan provides the mechanisms for ceasing active clean-up operations where Unified Command (UC) agrees that segments have been cleaned to the point where removal actions have been completed. The Plan provides the processes to deem that removal actions are complete for all segments that were never impacted by MC-252 oil, where endpoints have been met, or where the Federal On-Scene Coordinator (FOSC) determines current conditions are no longer a threat to the environment, or where further removal actions may cause more harm than good.

Reports of oil on a shoreline segment that was within the Gulf Coast Incident Management Team (GCIMT) Area of Response (AOR) but after removal actions have been completed within a segment will be responded to by the existing response organizational and resource infrastructure in each state. The existing infrastructure includes the National Response Center (NRC) process as defined in 40 CFR.

In order for removal actions to be completed on a segment several conditions must be met. Conditions are as follows:

- Operations must have an approved cessation of Patrol and Maintenance (P&M) activities where applicable for the specific segment(s) from the UC.
- The post 2011 Atlantic hurricane season inspections where applicable must be complete.
- The segment(s) must meet the conditions set out in, and be processed in accordance with, Chapter 6 (or 7) of this Plan.

This Plan incorporates and builds upon all previous applicable/appropriate processes. Where this Plan and previous shoreline plans ¹ or processes detailed within this plan do not align, guidance within this Plan shall prevail. This Plan will be effective upon approval by the FOSC.

For this Plan the term "segment" is used to describe both segments and zones for Louisiana (LA). For Mississippi (MS), Alabama (AL), and Florida (FL), there are only segments.

¹ DWH 2011 SCAT Plan for AL/FL/MS, 11 March 2011 and DWH 2011 Interim Shoreline Plan for LA, 23 March 2011

2. Objectives

The objectives addressed within this Plan will be implemented based on professional judgement, utilizing informed discussion and recognition of agency/trustee policies and laws, as well as fact and science. The specific objectives of this Plan include the following:

- Confirm the process for changing P&M frequencies for Stage 4 STRs (Shoreline Treatment Recommendation)
- Identify the process for determining which segments will receive post hurricane season inspections
- Define shoreline clean-up endpoints for applicable shoreline types
- Define the conditions necessary to deem removal actions are complete for any given segment including those under existing Stage 3 STRs and segments that have already had a SIR (Segment Inspection Report) issued
- Confirm SCAT Team notification requirements and composition to accomplish the objectives of this Plan
- Identify exceptions to the process or to the conditions for deeming removal actions are complete for some segments

This Plan is limited to the above objectives only and all other activities will be addressed in separate documents.

3. Changing P&M Frequencies of Stage 4 STRs

Stage 4 STRs that address recurrent oiling, as set out in the 2011 Shoreline Plans, allow Branches to request a change in the patrol frequency specified in the STR based on the trends in the amount of oiled materials collected by operational zone or segment. This request can be generated by the Branch Point of Contact (POC), Operations, the State Branch Liaison, the State On-Scene Coordinator (SOSC), or the Federal Land Manager. The Eastern States approach for Step 4 is presented in Attachments 4 - 6. Louisiana's specific approach is presented in Attachment 7. For Federally owned lands managed by the Department of Interior (DOI) the applicable state process may be utilized. Changes in patrol frequency must be based on objective data, made in a timely manner, and with good documentation on the basis for the change and the process used to reach concurrence. Each Branch office shall have a designated POC for this process (for example, currently, in FL, the POC is the Environmental Coordinator; the POC in Louisiana is currently the SOSC, etc.).

Once a P&M frequency is established for a STR 4, or a change in frequency is approved, it is the responsibility of Operations to adhere to that frequency, and to record and track waste collection volumes by segment. Planning will meet weekly with the SOSCs to review the segment tracker.

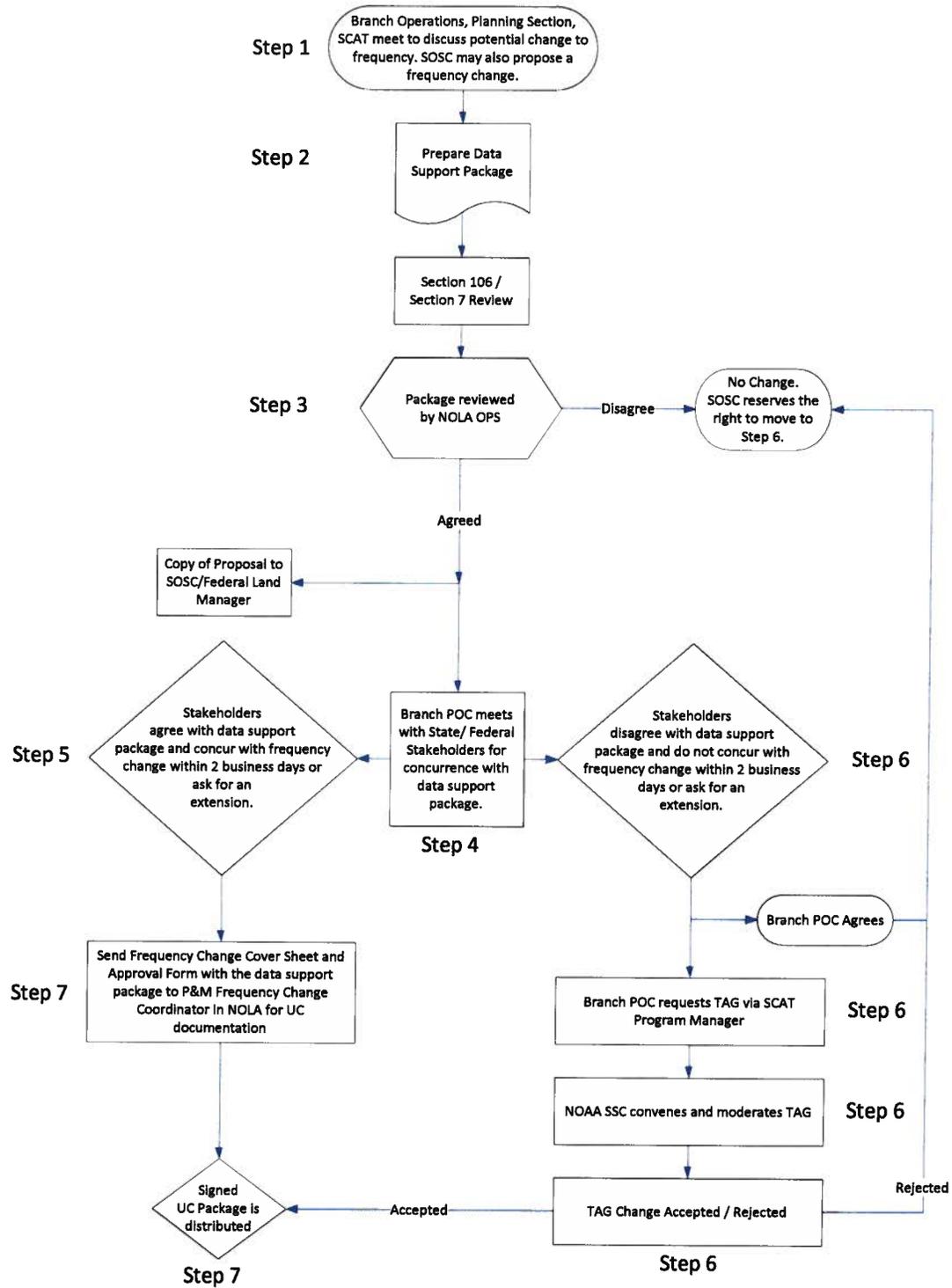


Figure 1 - Frequency Change Process

3.1. Process Steps

The following steps detail the process for changing the frequency for P&M activities as identified in Figure 1.

3.1.1. Step 1

Branch Operations, Planning Section, and SCAT meet to discuss possible changes to frequency in consultation with applicable resource trustees. The Branch POC must also consult with the United States Fish and Wildlife Service (USFWS) and the National Park Service (NPS) regarding potential concerns with Section 7 of the Endangered Species Act (ESA), and Section 106 of the National Historic Preservation Act (NHPA). Such meetings will be conducted as required and when data supports changes. The data can be presented and reviewed from charts and/or tabular data (currently assessed weekly in Eastern States). However, the same data points will be presented in each case within a state to ensure a consistent approach. The group agrees upon those segments or zones where the frequency of patrol should be changed (either increase or decrease). The SOSC /Federal Land Manager may also request a frequency change.

3.1.2. Step 2

Branch Operations / Federal Land Managers submit a request to the Branch POC to prepare a package for each STR 4 with recommended changes that includes the following, as appropriate:

1. Cover sheet that specifies the STR number, shoreline segment number(s), location, date of request, description of conditions as the basis for change and language describing the recommendation and request for concurrence, a list of segments or zones with the current patrol frequency and the requested revised patrol frequency, and other State/Federal specific information. Attachment 2 is the cover sheet as used by the Eastern States and Attachment 8 is used by LA.
2. Tabular data and/or charts showing the historical amounts of oiled MC-252 materials recovered. The format of these data will be consistent within each State and aligned to the prescribed metrics delivered weekly. For a segment to qualify for a frequency change actual frequencies must be reviewed and agreed to and it is agreed by the state that requirements have been adequately met (e.g., missed days due to unavoidable conditions such as weather stand downs are justified).
3. Map showing the segments and/or zones for which a change in patrol frequency is being requested.

3.1.3. Step 3

Branch POC packages data and sends to Ops Section Chief for review/concurrence. If Ops Section Chief does not concur with a decrease in frequency, the Branch POC is notified and no change to frequency is made. If Ops Section Chief concurs, a copy is sent to the SOSC /Federal Land Manager for information and the process goes to Step 4. SOSC/Federal Land Manager reserves the right to move to a Technical Advisory Group (TAG).

3.1.4. Step 4

Branch POC engages State Branch Liaison and Federal Land Manager representative as applicable to review the data (amount of oiled materials recovered for each recurrent STR 4 on a segment or whole STR basis) and provides the rationale for recommended change. If correspondence indicating the state or agency's basis for their position with regard to the recommended change in P&M activity (accept or deny) is not received in a given timeframe (48 hours during normal work week M-F, unless the state or Federal Land Manager requests an extension), then concurrence is assumed.

3.1.5. Step 5

If concurrence is achieved either by signature or through email, the Branch POC will submit the package with a cover sheet (Attachment 2 or 8) to the P&M Frequency Change Coordinator at the GCIMT for final UC review and signature, within 24 hours during the normal work week. The P&M Frequency Change Coordinator will distribute the final, signed package to Operations, Planning, SOSC, Environmental Section Chief, appropriate stakeholders, SCAT Program Manager, plus others as specified for each Branch.

In the event concurrence is not achieved by all stakeholders go to Step 6.

3.1.6. Step 6

The comments received from stakeholders/trustees are compiled and reviewed by the Branch POC with Branch Operations and SCAT to determine if it is appropriate to convene a TAG meeting (chaired by the NOAA SSC and including representatives of the State, Federal, Branch, FOSC, SOSC, Federal Land Manager, BP, Planning, and Environmental) to review the data and advise the UC on whether or not the request should be approved. The Branch POC can concur with no change to frequency recommendation. The Branch POC will contact the SCAT Program Manager to request a TAG meeting. The SCAT Program Manager works with NOAA SSC to convene a TAG for review of all the data and comments. The TAG will be called with a minimum of 6 hour notice but shall be held within 72 hours of the decision to convene. At the end of the TAG meeting, the TAG recommends to the FOSC or FOSC-R whether the requested change should be approved or denied, and the basis for their decision is attached to the cover sheet for UC review and final decision to approve or deny the request. The decision of the UC will be documented and will include a statement as to the decision and the justification.

If one of the UC members still does not concur, they are permitted to attach a decision memo to articulate the basis for their non-concurrence.

Final approval to proceed will be issued by the FOSC.

3.1.7. Step 7

This signed final package documenting the decision by the UC is sent by the P&M Frequency Change Coordinator to the SCAT Data Manager for filing in the appropriate STR and segment files and to post on SharePoint (<https://bpgomcom-45.sharepoint.microsoftonline.com/default.aspx>). In addition, the P&M Frequency Change Coordinator will copy the SCAT Program Manager, as well as the Branch POC, who will distribute in the Branch. Branch POC will distribute to stakeholder

contacts, as appropriate (State Branch Liaison, Federal Land Manager). Attachment 3 is the cover sheet used by GCIMT New Orleans for final signatures prior to implementation.

3.2. Tracking Changes in P&M Frequency

The Branch POC will track the changes in P&M inspection frequency for each STR 4. The tracking system will be updated on SharePoint after each change has been approved and also in the segment tracker for analysis of frequencies.

3.3. Environmental Compliance

As with all activities under Deepwater Horizon Spill Response, P&M surveys will continue to be required to follow all Best Management Practices (BMPs) and complete BMP checklists using Trimble GPS units. A Natural Resource Advisor (NRA) or Resource Advisor (READ), and archaeological and tribal monitor when required by the STR, will continue to accompany all P&M activities and document compliance for ESA, Migratory Bird Treaty Act (MBTA), Marine Mammal Protection Act (MMPA), and NHPA.

4. Determining Segments to Receive Post Hurricane Season Inspections

A post hurricane season inspection will be conducted on segments that are ready to be, or have been previously declared, operationally inactive, where a rationale for re-inspection is provided to and approved by the FOSC.

If a significant weather event occurs prior to the end of the 2011 Atlantic hurricane season, but after a post hurricane season inspection was made, a re-inspection of previously inspected segments impacted by the weather event will be conducted.

The SOSC from each state, the Federal Land Manager, or the FOSC as required, will work with SCAT and Planning to develop the list of segments for post hurricane season inspection within two (2) weeks of this Plan approval or November 15, 2011 whichever is sooner. These segments will then be scheduled for full SCAT inspections with a SCAT Team as defined in Chapter 8.1, including consultations with Section 106 and Section 7. Subsurface inspections will be included where deemed applicable by the SCAT Team Lead (TL) in consultation with the SCAT Team members. If the results of these inspections:

- Meet Shoreline Clean-up Endpoints as identified in this Plan, it will be deemed that removal actions are completed for these segments. A SIR form will be provided for approval noting "previously declared operationally inactive, post hurricane inspected, meets endpoints".
- Identify minor amounts of Surface Residue Balls (SRBs) (that in the opinion of the SCAT team are MC-252) that exceed the size requirement, but the percent coverage criteria have been met, will be removed from the segment by SCAT and the segment re-inspected no sooner than 48 hours. This size requirement does not apply to Louisiana. If the subsequent Inspection results indicate that the segment(s) meet endpoint criteria, then an SIR form as noted in the previous step will be completed. If the Inspection results in the segment(s) not

meeting endpoint criteria, the segment(s) will either be returned to OPS as noted in the step below or a discussion (TAG) will occur in order to discuss how the segment(s) should be handled.

- Are above Shoreline Clean-up Endpoints, a STR 4 will be written and Ops will be mobilized to the segment for clean-up. The process outlined in Chapter 6 will be followed to determine when the segment will be re-inspected.

The remaining Operationally Inactive (OI) segments will be considered as removal actions complete unless the SCAT Team determines there is a need to inspect adjacent segments.

5. Shoreline Clean-up Endpoints

The following tables identify the Eastern States Shoreline Clean-up Endpoints. Shoreline type is as defined in the relevant STR.

Shoreline Type	Surface Oil	Subsurface Oil
Residential and Amenity Sand Beaches	No visible MC-252 oil, <i>or</i> as low as reasonably practicable, considering the allowed treatment methods and net environmental benefit	No visible MC-252 oil, <i>or</i> as low as reasonably practicable considering the allowed treatment methods and net environmental benefit
Non-Residential or Non-Amenity Sand Beaches	< 1% visible surface oil and oiled debris, and no SRBs > 5 cm (~2 inches) <i>or</i> as low as reasonably practicable, considering the allowed treatment methods and net environmental benefit	No subsurface oil exceeding 3 cm (~1¼ inch) in thickness and patchy (<50%) distribution that is greater than Oil Residue, <i>or</i> as low as reasonably practicable considering the allowed treatment methods and net environmental benefit
Beaches in Special Management Areas (state and federal wildlife refuges, parks, wilderness areas)	<u>Subject to direction of Special Area Managers:</u> < 1% surface oil and oiled debris, and no SRBs > 2.5 cm (~1 inch) <i>or</i> as low as reasonably practicable considering the allowed treatment methods and net environmental benefit	<u>Subject to direction of Special Area Managers:</u> No subsurface oil exceeding 3 cm (~1¼ inch) in thickness and patchy (<50%) distribution that is greater than Oil Residue, <i>or</i> as low as reasonably practicable considering the allowed treatment methods and net environmental benefit
USFWS Breton National Wildlife Refuge (Chandeleur Islands)	< 1% surface oil and oiled debris, <i>or</i> as low as reasonably practicable considering the allowed treatment methods and net environmental benefit	No removal of subsurface oil

Table 1 - Shoreline Clean-up Endpoints Eastern States

Shoreline Type	Surface Oil
<p>Coastal Marshes and Mangroves</p>	<ul style="list-style-type: none"> - No flushable oil on the vegetation or soils - No release of sheens that can affect sensitive resources - No thick oil (TO = >1 cm) residues: <ul style="list-style-type: none"> o at the edge of the marsh o on beach/shell berm/overwash areas o in the marsh interior, including isolated patches within the marsh - No thick or pooled oil (TO) in the marsh interior or below the vegetation that cannot be accessed by other means <p><u>or</u></p> <p>as low as reasonably practicable considering the allowed treatment methods and net environmental benefit</p>
<p>Man-made Structural Shorelines</p>	<ul style="list-style-type: none"> - No accessible oiled debris - For non-amenity areas, no surface oil greater than Stain or Coat (>20 %) distribution - No oil on surfaces that rubs off on contact - In high public use or high visibility areas, no surface oil greater than Stain or 10% Coat distribution on solid surfaces - In inaccessible or remote areas where oil removal was not possible because of safety restrictions or ecological/cultural restraints, oil no longer generates petrogenic sheens that can affect sensitive resources under all weather conditions <p><u>or</u></p> <p>as low as reasonably practicable considering the allowed treatment methods and net environmental benefit</p>

Table 1 Continued - Shoreline Clean-up Endpoints Eastern States

The following tables (2 – 4) identify the Louisiana Shoreline Clean-up Endpoints.

Beach Type	Surface Oil Endpoints	Subsurface Oil Endpoints
Residential Beaches (e.g. Grand Isle and 100 yards on either side of the public access point on Elmers Island)	No visible oil that is MC-252, or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit	No visible MC-252 subsurface oil above stain, or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit
Non-Residential Beaches (e.g. Grand Terre(s), East Timbalier) and Non-Federal Special Management Areas (e.g. South Pass, Whiskey Island)	< 1% distribution of oil and oiled debris, or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit	No subsurface oil exceeding 2.54 cm in thickness and patchy (<50% distribution) that is greater than Oil Residue, or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit
Beaches in Federal Special Management Areas (e.g. Chandeleur Islands)	< 1% surface oil and oiled debris, or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit	No attempt to remove subsurface oil

Table 2 - Endpoints for Sand Beaches in Louisiana

Shoreline Type	Endpoints
Coastal Marshes and Mangroves	<p>No flushable oil on the vegetation or soils</p> <p>No release of heavy, persistent sheen that can affect sensitive resources</p> <p>No thick oil residues at the edges of:</p> <ul style="list-style-type: none"> The marsh The beach/shell berm/overwash areas <p>No thick or pooled oil in the marsh interior, including isolated oiling patches within the marsh</p> <p>No more thick or pooled oil in the marsh interior or below the vegetation.</p> <p>No oil that is sticky to fur and feathers</p> <p>Or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit</p>

Table 3 - Endpoints for Coastal Marshes and Mangroves

Shoreline Type	Endpoints
Man-made Structural Shorelines	<p>No accessible oiled debris</p> <p>For non-amenity areas, no surface oil greater than Stain or Coat >20 % distribution</p> <p>No oil on surfaces that rubs off on contact</p> <p>In high public use or high visibility areas, no surface oil greater than Stain or 10% Coat distribution on solid surfaces</p> <p>In inaccessible or remote areas where oil removal was not possible because of safety restrictions or ecological/cultural restraints, no longer generates petrogenic sheens that can affect sensitive resources under all weather conditions</p> <p>Or as low as reasonably practicable considering the allowed treatment methods and net environmental benefit</p>

Table 4 - Endpoints for Man-made Structural Shorelines

6. Conditions Necessary for Segments to be Deemed that Removal Actions are Complete

This Chapter presents the process for segments to be deemed that removal actions are complete for all segments remaining in Stage 4 at the time this Plan is approved by the FOSC. This process is diagrammed in Figure 2 and discussed below. The numbered steps below correspond to the numbered steps shown in Figure 2.

Segments that are under a Stage 3 STR at the time this Plan becomes effective and that will have a Stage 4 STR written will enter the process as shown in Figure 2. STR 3s that are for nearshore subtidal tar mat removal in AL and FL will be closed out when removal actions are deemed complete for the shoreline segments currently under Stage 4 STRs that have potential for near shore subtidal tar mats. The STR 3 for South Pass, LA will be closed out once the endpoints are met, and dredging operations and U.S. Army Corp of Engineers (USACOE) permit conditions at that location are satisfied. An appropriate STR 4 will then be developed.

Segments that have had a SIR 1 (previously referred to as a SIR 4) approved prior to the time this Plan is approved by the FOSC will enter the process as shown in Figure 2. All other ready to be operationally inactive or operationally inactive segments, which are not segments listed for the post hurricane season inspection, will enter the process at step 14 in Figure 2. SCAT, SOSOC from each state and the Federal Land Manager will meet to determine where segments best fit with the following steps.

Examples of the Pre-Inspection Survey Transmittal (PIST) form and SIR form used in the process outlined below are included as Attachments 9 and 10 to this Plan.

Process for Segments to be Deemed that Removal Actions are Complete

PIST Process

1. Operations will request SCAT to conduct a PIST survey, and Operations will suspend P&M activities. SCAT will schedule the PIST and notify the State representative. If the PIST is to occur on federal lands, SCAT will also notify the DOI/Federal Land Manager to provide a READ.
2. If the PIST identifies SRBs that do not meet the endpoint criteria stated in Chapter 5 but can be easily and quickly recovered by the SCAT Team Lead, he/she will recover the SRBs (referred to as SCAT mitigated) and reschedule a PIST no sooner than 48 hours. SCAT will deliver the recovered SRBs to Operations for waste tracking and proper disposal. If the second PIST attempt finds SRBs that still do not meet endpoint criteria, SCAT will notify Operations to resume P&M activities to make a sweep of the segment(s) prior to scheduling another PIST.
3. If the PIST finds SRBs that are more than what SCAT can easily and quickly recover, the PIST will indicate the segment is not ready for inspection. SCAT will notify Operations to resume P&M activities on the segments. If SRB presence is determined by SCAT to be a recurring

issue in the segment(s), further discussion with the SOSC, Federal Land Manager (on federal lands), and Operations will be necessary to determine appropriate next steps.

4. If the PIST indicates the segment is ready for inspection, SCAT will notify Operations and the SOSC/Federal Land Manager or his designee, and SCAT will schedule a full SCAT inspection (SIR 1) no sooner than 48 hours. The SIR 1 inspection will be placed on the calendar within 5 days of the PIST result of ready for inspection (although the SIR 1 inspection may actually occur after 5 days). If the inspection is scheduled for later than the next required P&M, SCAT will meet with OPS and the SOSC and Federal Land Manager (on federal lands) to agree to the date or allow the P&M and re-schedule the inspection.

SIR 1 Process

5. The SCAT Team as defined in Chapter 8.1 will conduct the SIR 1 inspection. If the SIR 1 inspection identifies SRBs that do not meet the endpoint criteria stated in Chapter 5 but can be easily and quickly recovered by the SCAT Team Lead, he/she will recover the SRBs (referred to as SCAT mitigated) and reschedule the SIR 1 inspection no sooner than 48 hours. SCAT will deliver the recovered SRBs to Operations for waste tracking and proper disposal. If the second SIR 1 inspection attempt finds SRBs that still do not meet endpoint criteria, SCAT will notify Operations to resume P&M activities and make a sweep of the segment(s) returning to Figure 2 step 3.
6. If the SIR 1 inspection finds SRBs that are more than what SCAT can easily and quickly recover, the SIR 1 inspection will fail, SCAT will notify Operations to resume P&M activities, returning to Figure 2 step 3. If SRB presence is determined by SCAT to be a recurring issue in the segment(s), further discussion with the SOSC, Federal Land Manager (on federal lands), and Operations will be necessary to determine appropriate P&M activities.
7. If the SIR 1 inspection passes, SCAT will notify Operations, and a SIR 1 form will be prepared and issued with the SCAT monitoring frequency noted (either 2 weeks or 30-days, depending on segment oiling history) . (Refer to the SIR Review & Approval Process)

SCAT Monitoring

8. The segment(s) will enter a minimum 30-day SCAT monitoring period beginning from the date of the inspection.
9. If SCAT monitoring identifies SRBs that do not meet the endpoint criteria stated in Chapter 5 but can be easily and quickly recovered by the SCAT Team Lead, he/she will recover the SRBs (referred to as SCAT mitigated) and reschedule SCAT monitoring after at least 48 hours have passed. SCAT will deliver the recovered SRBs to Operations for waste tracking and proper disposal. If the second SCAT monitoring attempt finds SRBs that still do not meet endpoint criteria, SCAT will notify Operations to resume P&M activities and make a sweep of the segment(s) returning to Figure 2 step 3.
10. If SCAT monitoring finds SRBs that are more than what SCAT can easily and quickly recover, SCAT will notify Operations to resume P&M activities returning to Step 3. If SRB presence is determined by SCAT to be a recurring issue in the segment(s), further discussion with the

SOSC, Federal Land Manager (on federal lands), and Operations will be necessary to determine appropriate P&M activities.

11. If after the 30 day monitoring period, SCAT determines that the segment(s) meet or are below endpoint criteria, SCAT will schedule a full SCAT inspection (SIR 2).

SIR 2 Process

12. The SCAT Team as defined in Chapter 8.1 will conduct the SIR 2 inspection. If the SIR 2 identifies SRBs that do not meet the endpoint criteria stated in Chapter 5 but can be easily and quickly recovered by the SCAT Team Lead, he/she will recover the SRBs (referred to as SCAT mitigated) and reschedule a SIR 2 no sooner than 48 hours. SCAT will deliver the recovered SRBs to Operations for waste tracking and proper disposal. If the second SIR 2 attempt finds SRBs that still do not meet endpoint criteria, SCAT will notify Operations to resume P&M activities returning to Figure 2 step 3.
13. If the SIR 2 finds SRBs that are more than what SCAT can easily and quickly recover, the SIR 2 will fail, and SCAT will notify Operations to resume P&M activities returning to Step 3. If SRB presence is determined by SCAT to be a recurring issue in the segment(s), further discussion with the SOSC, Federal Land Manager (on federal lands), and Operations will be necessary to determine appropriate P&M activities.
14. If the SIR 2 passes, SCAT will prepare and issue a SIR 2 form.

Removal Actions are Deemed Complete

15. Once the SIR 2 is signed by the FOOSC, removal actions on the segment(s) will be deemed complete.

Process for Remaining Shoreline Segments in Stage 4 to be Deemed that Removal Actions are Complete

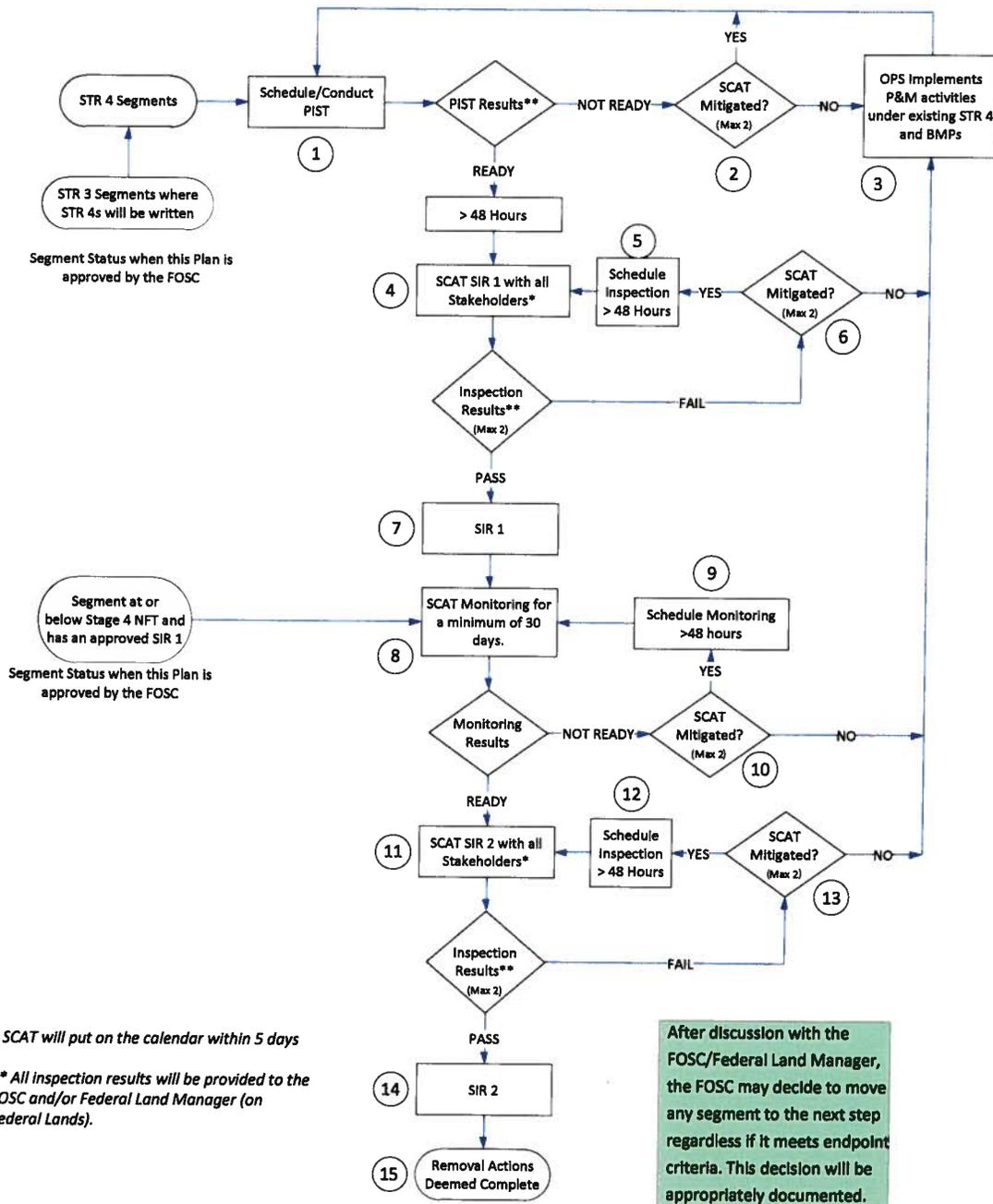


Figure 2 - Shoreline Clean-up Completion Process

7. Exceptions to the Process

There may be exceptions to the process described in Chapter 6 to deem removal actions are complete for some segments. These exceptions along with their rationale will be presented to the FOSC for approval.

Reasons for removing segments from or leaving segments in active response include but are not limited to:

- The Federal Land Manager recommends that removal actions are complete before Chapter 5 endpoints have been met,
- Segments where planned beach replenishment, restoration, or other state or Federal activities will impact Deepwater Horizon response activities, and
- Segments that require additional or unique clean-up actions that render the endpoints or process outlined in Chapters 5 and 6 no longer applicable or practical.

Shoreline segments proposed to remain in by exception or be transferred to removal actions complete status by exception will be identified and the rationale for their transfer discussed with the FOSC, SOSC, Federal Land Managers (if on Federal lands), the Responsible Party (RP), and applicable local government and/or landowner representative through the SOSC. Upon consultation with the above, a SIR will be generated with the "other" box checked, and the reason(s) for the exception clearly noted. The SIR will be routed to the above parties, prior to FOSC approval to retain segments or transfer to removal actions complete status by exception.

8. SCAT Team Composition and Notification Requirements

SCAT Team activities will include pre-inspection surveys, inspections, monitoring activities, and at selected locations, beach profiles, and photo-monitoring.

8.1. Team Composition

The SCAT team compositions are as follows:

- PIST Surveys
 - SCAT Team Lead
 - State Representative (and READ for Federal Lands)
- Inspections
 - Federal – USCG and/or NOAA
 - State
 - State Land Manager (State lands only)
 - SCAT Team Lead
 - Federal Land Manager (Federal lands only)
 - Parish or county representatives, land owner representatives as applicable (to be determined by the SOSC) will be invited, but are not required, to participate in the

inspection. If the parish, county, or land owner representative is not available the inspection will continue with the SCAT team described above.

- Monitoring, Beach Profiles, and Photo-monitoring
 - SCAT Team Lead
 - State Representative (and READ for federal Lands)

Depending on operational or seasonal considerations safety, natural resource, archaeological and tribal monitors, or other personnel may be added to these teams.

8.2. Notifications

Notifications of all PISTs and SIRs will be made by the Branch POC to the SOSC, Federal Land Manager or their designee and to OPS. Notification will be made by email with a minimum of 24 hours notice.

9. Acronymns

Acronymns within this document are identified below.

ACP	Area Contingency Plan
ADEM	Alabama Department of Environmental Management
AL	Alabama
AOR	Area of Response
BP	BP
cm	Centimeter(s)
DOI	Department of Interior
EFH	Essential Fish Habitat
EMA	Emergency Management Agency
ESA	Endangered Species Act
FL	Florida
FOSC	Federal On-Scene Coordinator
GCIMT	Gulf Coast Incident Management Team
GoM / GOM	Gulf of Mexico
ICS	Incident Command System
LA	Louisiana

m	Meter(s)
MBTA	Migratory Bird Treaty Act
MC-252	Mississippi Canyon Block 252
MDEQ	Mississippi Department of Environmental Quality
MMPA	Marine Mammal Protection Act
MS	Mississippi
NCP	National Contingency Plan
NFT	No Further Treatment
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NOLA	New Orleans, Louisiana
NRA	Natural Resource Advisor
NRC	National Response Center
OI	Operationally Inactive
OPS	Operations
OR	Cover (>0.1 – 1 cm) or Coat (>0.01 – 0.1cm) of oil residue on sediments and/or some pore spaces partially filled with oil
P&M	Patrol and Maintenance
PIST	Pre-Inspection Survey Transmittal
POC	Point of Contact
READ	Resource Advisor
RP	Responsible Party
SCAT	Shoreline Cleanup Assessment Technique
SCAT TL	Shoreline Cleanup Assessment Technique – Team Lead (Responsible Party)
SERT	State Emergency Response Team
SIR	Segment Inspection Report
SOSC	State On-Scene Coordinator
SRB	Surface Residue Ball (MC-252 derived)

SSC	Scientific Support Coordinator
STR	Shoreline Treatment Recommendation
TAG	Technical Advisory Group
Tar Ball	Diameters are generally < 1 meter
TB	Tar Ball (non MC-252 derived)
TL	Team Lead
TO	Thick oil >1.0 cm thick
UC	Unified Command
USCG	United States Coast Guard
USACOE	U.S. Army Corps of Engineers
USFWS	United States Fish and Wildlife Service

10. Attachments

1. Core Group Listing
2. Frequency Change Form Cover Sheet (Illustrative)
3. Frequency Change Request Approval Form (Illustrative)
4. State of Florida Specific Procedures for Frequency Change
5. State of Alabama Specific Procedures for Frequency Change
6. State of Mississippi Specific Procedures for Frequency Change
7. State of Louisiana Specific Procedures for Frequency Change
8. Louisiana Change Form (Illustrative)
9. PIST form (Illustrative)
10. SIR form (Illustrative)
11. FOSC Directive
12. Background Oiling

Attachment 1 - Core Group Listing

Seventeen (17) Core Team members participated in the shoreline clean-up completion planning process. The Core Team members were as follows:

- USCG – 2 Representatives: FOOSC & Deputy IC
- State of Florida – 2 Representatives: SOSOC & Environmental Liaison
- State of Alabama – 2 Representatives: SOSOC & Environmental Liaison
- State of Mississippi – 2 Representatives: SOSOC & Environmental Liaison
- State of Louisiana – 2 Representatives: SOSOC & Technical Specialist
- NOAA SSC – 1 Representative
- DOI – 1 Representative
- NPS (NHPA) – 1 Representative
- USFWS – (ESA, MBTA, MMPA) – 1 Representative
- SCAT – 1 Representative: SCAT Program Manager
- RP, BP – 2 Representatives: BP IC & Environmental Section Chief

**Attachment 2 – Frequency Request Change Cover Sheet (Illustrative)
Operational Patrol Frequency Change Proposal and Concurrence**

STR: _____

Date: _____

Description of conditions as basis for change (OPS, SCAT, ENV, Section 106, Section 7, & PLN): All in concurrence

Oil Recovery Table Attached: Y / N	Oil Recovery Graphs Attached: Y / N
------------------------------------	-------------------------------------

Segments	Current Patrol Frequency	Revised Patrol Frequency

Consultation for Concurrence with Stakeholders/Major Land Managers:

Name	Stakeholder / Agency	Date/Time	Comment

[NOTE: If concurrence cannot be reached, forward to UC]

[NOTE2: Email is an acceptable means of Concurrence should direct contact not be possible]

Date/Hour: _____

Submitted by: _____

Proposal e-mailed to:

- FOSC
- SOSC
- State Response Lead
- State Planning Lead
- Federal Land Manager
- Section 7
- Section 106

Concurrence e-mailed to:

- FOSC
- SOSC
- State Response Lead
- State Planning Lead
- Federal Land Manager
- Section 7
- Section 106
- USCG Branch Director

**Attachment 3 – Change of Patrol Frequency Request Approval Form
(Illustrative)**

MC-252 Spill Response

STR 4 _____

Location: _____

Date: _____

Request to Change Patrol/Maintenance Interval: _____

Description of conditions as basis for change:
--

Segment/ Zone #	Current Patrol Frequency	Revised Patrol Frequency

Approvals:

Signature	Printed Name	Date
_____	_____	_____
Federal On-Scene Coordinator		
_____	_____	_____
State On-Scene Coordinator		
_____	_____	_____
BP Environmental Section Chief		
_____	_____	_____
Federal Land Manager		
_____	_____	_____
US Fish and Wildlife Service		
_____	_____	_____
Section 7		
_____	_____	_____
Section 106		

Attachment 4 - State of Florida Procedures for Frequency Change

Florida Clarification on Frequency Change Stakeholder Concurrence Sub Process for Step 4

- A) Once Branch POC receives approval from NOLA Ops, Branch POC forwards the package, on a normal business day (M-F), to the Florida Branch State Liaison, Florida Scientific Support Coordinator and USCG Branch Director for review. Branch POC schedules a meeting with the group to discuss the package. The package shall include the following information as described in Step 2 of the Shoreline Clean-up Completion Plan.
- B) If the State concurs, the package will be presented by the team consisting of the POC (or POC-designated BP rep), Florida Branch State Liaison and USCG Branch Director (Optional) to the appropriate local government and (if different) the land owner (e.g., the NPS or DOD) to get their concurrence.
- C) Once local government/landowner concurrence is received, the form (Attachment 2) is signed and the package is sent to NOLA for final signoff (using Attachment 3). See Step 5 of the Shoreline Clean-up Completion Plan for complete process. NOTE: The final UC signed package shall be distributed to the following Florida Branch personnel: Branch AOM, USCG Branch Director, Florida Branch State Liaison, Response Lead, Planning Lead, Environmental Coordinator and SCAT team lead(s).
 - The entire process will move as quickly as possible but recognizing that given schedules and availability it may take longer than 48 hours in some instances.
 - i. Step A shall be completed within 2 business days.
 - ii. Step B shall be completed within 2 business days.
 - iii. Step C shall be completed within 1 business day.
 - iv. Stakeholder may request an extension for Step C (i), (ii), and (iii) then concurrence is assumed if timeframe(s) cannot be met.
 - v. While in step 4, the Branch POC will provide the Branch Leadership Team, the NOLA POC (currently Florida State SCAT Coordinator), and the SOSC with updates as it moves through the process.
- D) If concurrence is not achieved for all stakeholders, Branch POC implements Step 6 of the Shoreline Clean-up Completion Plan.

Attachment 5 - State of Alabama Procedures for Frequency Change

Alabama DEM - 2011 Frequency Changes – Approach/Process

Pursuant to Chapter 3 of this document (3.1.1. through 3.1.4.), a frequency change request data support package is prepared by AL Branch – Gulf Shores. If the request receives concurrence from the Operations Section Chief, the Branch POC will then provide the data support package to the AL Branch liaison (a.k.a. the ADEM representative at the AL Branch facility).

Step 1

Upon receipt of the frequency change request and the accompanying data support package, the AL Branch liaison will initiate the State's review of the recommendation which may include solicitation of comments (engagement) from affected parties, as appropriate. This may include forwarding of the package to internal ADEM reviewers, local government contacts, and landowners. For the purpose of advancing the response process, this review and comment period is limited to 48 hrs.

Step 2

The AL Branch liaison collects and reviews comments, documentation, and information received as part of Step 1 (including his/her own knowledge of the area and its oiling history and his/her observations of the segment[s]) and then informs the AL SOSC of his/her recommendation relative to agreement or disagreement with the Branch POC frequency change request.

Step 3

The AL SOSC will make a final determination (agreement or disagreement) on the Branch POC's frequency change request and will inform, by signature or electronically through email, the Branch POC either directly or through the Branch liaison.

Step 4

Process continues pursuant to Chapter 3 of this document (3.1.5. through 3.1.7.)

Attachment 6 - State of Mississippi Procedures for Frequency Change

Mississippi DEQ - 2011 Frequency Changes – Approach/Process

- Frequency Change - Data Support Package will be prepared by MS Branch – Gulfport, MS.
- MS Branch Point of Contact (POC) sends Frequency Change - Data Support Package (if approved by NOLA Ops) to MDEQ Env Lead.
- MDEQ Environmental Lead (MDEQ Env Lead)
 - MDEQ Env Lead sends Frequency Change Package to County EMA, MDEQ SERT (on rotation in the particular County), and MS SOSOC:
 - County EMA given two (2) working days for review.
 - MDEQ SERT given two (2) working days for review. MDEQ SERT inspection of associated frequency change segments may occur; MDEQ SCAT member (currently on rotation) may be requested for inspection, if available.
 - If a MDEQ SERT inspection occurs, DEQ SERT will provide written report, within the 48-hrs, to MDEQ Environmental Lead.
 - The indicated 48-hour time allowance runs concurrent with the county EMA time allowance.
 - MDEQ Environmental Lead collects any comments, documentation, and/or reports from EMA, SCAT and SERT and makes recommendation to MS SOSOC. If recommendation “disagrees” with Frequency Change, MS SOSOC and/or MS Env Lead will inform MS Branch POC.
 - MDEQ Environmental Lead will provide a vicinity map and develop a one page summary to MS SOSOC. This “information” package will be prepared by Env Lead for either “approval” or “disapproval” of Frequency Change. Note: For federally owned lands, managed by the Department of Interior (DOI), the MDEQ Environmental Lead will coordinate with the appropriate Federal Land Manager representatives.
- MS SOSOC
 - MS SOSOC reviews sign-offs by County EMA, MDEQ SCAT, MDEQ SERT and MDEQ Env Lead (along with additional information submitted by MDEQ Env Lead). MS SOSOC notifies MS Branch POC of State’s decision (the NOLA Env Section Chief (ESC) and SCAT Program Manager will be cc’d on correspondence).

Attachment 7 - State of Louisiana Procedures for Frequency Change

Process Steps

The following steps detail the process for changing the frequency for patrolling and maintenance activities for the State of Louisiana, as identified in Figure 1 – Louisiana P&M Process Flow Chart.

Step 1

Branch Operations, Planning Section, and SCAT meet to discuss possible changes to frequency in consultation with applicable resource trustees. The Branch POC must also consult with the United States Fish and Wildlife Service (USFWS) and the National Park Service (NPS) regarding potential concerns with Section 7 of the Endangered Species Act (ESA), and Section 106 of the National Historic Preservation Act (NHPA). Such meetings will be conducted either as required by the STR, when data supports changes, or when the SOSC or Federal Land Manager requests a frequency change. The data can be presented and reviewed from charts and/or tabular data. However, the same data points will be presented in each case within a state to ensure a consistent approach. The group agrees upon those segments or zones where the frequency of patrol should be changed (either increase or decrease).

Step 2

Branch Operations / Federal Land Managers submits a request to the Branch POC to prepare a package for each STR4 for recommended changes that includes the following, as appropriate:

1. Cover sheet that specifies the STR number, location, date of request, description of conditions as the basis for change and language describing the recommendation and request for concurrence, a list of segments or zones with the current patrol frequency and the requested revised patrol frequency, and other State/Federal specific information. Attachment 3 is the cover sheet as used by Louisiana.
2. Tabular data and/or charts showing the historical amounts of oiled MC 252 materials recovered. The format of these data will consist of the Daily Louisiana Update report prepared by Operations Section and the Weekly Ops Segment Tracker prepared by Planning Section. For a segment to qualify for a frequency change actual frequencies must be reviewed and agreed to and it is agreed by the state that requirements have been adequately met (e.g., missed days due to unavoidable conditions such as weather stand downs are justified).
3. Map showing the segments and/or zones for which a change in patrol frequency is being requested.
4. Any other relevant data that is used to support the request for changing P&M frequency, such as beach profiles.

Step 3

Branch POC packages data and sends to OPS Section Chief for review/concurrence. If Ops Section Chief does not concur with a change in frequency, the Branch POC is notified and no change to frequency is made. If Ops Section Chief concurs, a copy of the data package outlined in Step 2 is sent to the SOSC for stakeholder concurrence, and the Federal Land Manager for information, and the process goes to Step 4. The SOSC and Federal Land manager reserve the right to move to a Technical Advisory Group (TAG).

Step 4

Louisiana SOSC engages stakeholders/trustees in a review of data (amount of oiled materials recovered for each recurrent STR4 on a segment or whole STR basis) to provide rationale for the recommended change. If correspondence indicating the state's basis for their position with regard to the recommended change in P&M activity (accept or deny) is not received from the SOSC in a given timeframe (48 hours during normal work week M-F, unless the SOSC or Federal Land Manager requests an extension), then concurrence is assumed.

Step 5

The Louisiana SOSC will notify the Branch POC if concurrence is achieved either by signature or through email. The Branch POC will submit the package with a cover sheet (Attachment 3) to the P&M Frequency Change Coordinator at the GCIMT for final UC review and signature, within 24 hours during the normal work week. The P&M Frequency Change Coordinator will distribute the final, signed package to Operations, Planning, SOSC, Environmental Section Chief, appropriate stakeholders, SCAT Program Manager, plus others as specified for each Branch.

In the event concurrence is not achieved for all stakeholders go to Step 6

Step 6

The comments received from stakeholders/trustees are compiled and reviewed by the SOSC. SOSC will provide written notification with justification for the non-concurrence to the Branch POC. Branch POC will meet with Branch Operations and SCAT to determine if it is appropriate to convene a Technical Advisory Group (TAG) meeting (chaired by the NOAA SSC and including representatives of the State, Branch, FOSC, SOSC, BP, Planning, and Environmental) to review the data and advise the UC on whether or not the request should be approved. The Branch POC can concur with no change to frequency recommendation. The Branch POC will contact the SCAT Program Manager to request a TAG meeting. The SCAT Program Manager works with NOAA SSC to convene a TAG for review of all the data and comments. The TAG will be called with a minimum of 6 hour notice but shall be held within 72 hours of the decision to convene. At the end of the TAG meeting, the TAG recommends to the FOSC or FOSC-R whether the requested change should be approved or denied, and the basis for their decision is attached to the cover sheet for UC review and final decision to approve or deny the request. The decision of the UC will be documented and the final package will include a statement as to the decision and the justification.

If one of the UC members still does not concur, they are permitted to attach a decision memo to articulate the basis for their non-concurrence.

Final approval to proceed will be issued by the FOSC.

Step 7

This signed final package documenting the decision by the UC is sent by the P&M Frequency Change Coordinator to the SCAT Data Manager for filing in the appropriate STR and segment files and to post on SharePoint (<https://bpgomcom-45.sharepoint.microsoftonline.com/default.aspx>). In addition, the P&M Frequency Change Coordinator will copy the SCAT Program Manager, as well as the Branch POC, who will distribute in the Branch. Branch POC will distribute to SOSC and Federal

Land Manager, and SOSC will distribute to stakeholders/trustees. Attachment 3 is the cover sheet used by GCIMT New Orleans for final signatures prior to implementation.

Tracking Changes in P&M Frequency

The Branch POC will track the changes in P&M inspection frequency for each STR 4. The tracking system will be updated on SharePoint after each change has been approved and also in the segment tracker for analysis of frequencies.

Environmental Compliance

As with all activities under Deepwater Horizon Spill Response, P&M surveys will continue to be required to follow all Best Management Practices (BMPs) and complete BMP checklists using Trimble GPS units. A Natural Resource Advisor (NRA) or Resource Advisor (READ), and archaeological and tribal monitor when required by the STR, will continue to accompany all P&M activities and document compliance for ESA, Migratory Bird Treaty Act (MBTA), Marine Mammal Protection Act (MMPA), and NHPA.

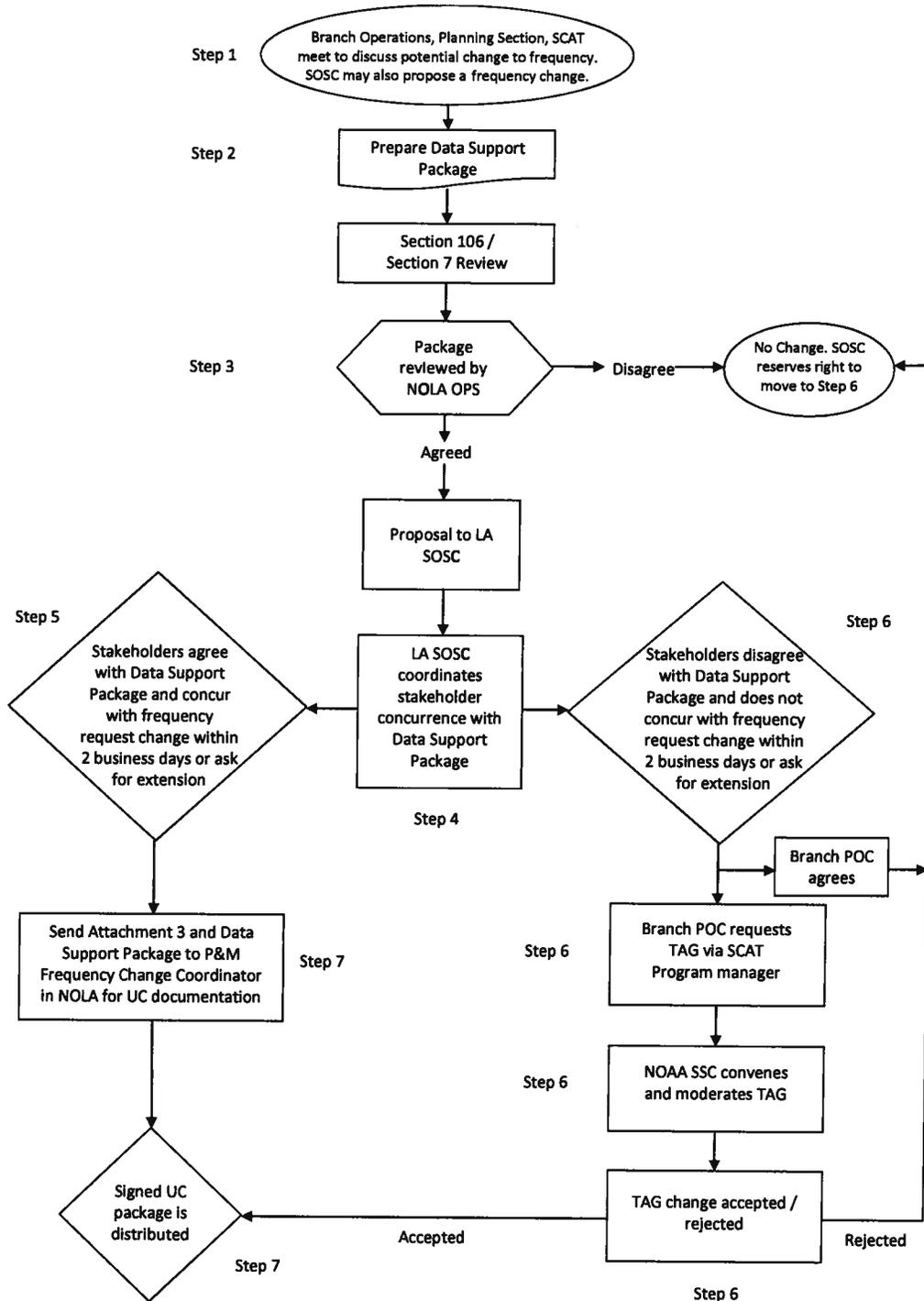


Figure 1 - Louisiana P&M Process Flow Chart

Attachment 8 – Louisiana Change Form (Illustrative)
Louisiana Change of Patrol Frequency Request Approval Form

MC-252 Spill Response STR 4 _____

Location: _____ Date: _____

Request to Change Patrol/Maintenance Interval: _____

Description of conditions as basis for change:
--

Segment/ Zone #	Current Patrol Frequency	Revised Patrol Frequency

Approvals:

Signature	Printed Name	Date
_____	_____	_____
Federal On-Scene Coordinator		
_____	_____	_____
State On-Scene Coordinator		
_____	_____	_____
BP Environmental Section Chief		
_____	_____	_____
Federal Land Manager		
_____	_____	_____
US Fish and Wildlife Service		
_____	_____	_____
Section 7		
_____	_____	_____
Section 106		

Attachment 9 – PIST Form (Illustrative)

SCAT – Pre-Inspection Survey Transmittal (PIST)

Survey Date: _____

State: _____

Parish/County: _____

Segments: _____

Team: RP rep _____

Signed: _____

State rep _____

Signed: _____

SCAT Mitigated YES NO

Segment(s) ready for SIR inspection? YES NO

CSOS¹/WOS²/TOS³ attached? YES NO

If NO:

Is location description attached? YES NO

Should P&M continue? YES NO

Comments:

Surface Oiling:

Subsurface Oiling:

SCAT Team Lead Recommendations:

¹ Combined Shoreline Oiling Summary

² Wetland Oiling Summary

³ Tar ball Oiling Summary

Attachment 10 - SIR Form (Illustrative)

Deepwater Horizon Response - Shoreline Inspection Report

SIR ____

Location	County/Parish	State
Local Name		Inspection Date(s)
Segment(s)		

Segment History	
What STRs were created for these segments?	
Prior SCAT Inspection Dates By Segment	

<input type="checkbox"/> Transfer to SCAT Monitoring	<input type="checkbox"/> Meets Shoreline Completion Endpoints
<input type="checkbox"/> Further Treatment Required	<input type="checkbox"/> Move to P&M
<input type="checkbox"/> SCAT Mitigated	<input type="checkbox"/> Cleanup Actions Deemed Complete
<input type="checkbox"/> Previously declared operationally inactive, post hurricane inspected, meets endpoints	<input type="checkbox"/> Other

Comments :

Sign: _____	Sign: _____	Sign: _____
Print: _____	Print: _____	Print: _____
Date: _____	Date: _____	Date: _____
SOSC	FOSC	BP-ESC

Sign: _____
 Print: _____
 Date: _____
 Federal Land Manager
 (Federal Land Only)

Attachment 11 - USCG Directive



Federal On-Scene Coordinator

Incident Management Team
1250 Poydras Street
New Orleans, LA 70113

16451
27 Oct 2011

MEMORANDUM

From:  J.A. Hein
FOSC

To: Gulf Coast Incident Management Team

Subj: OPERATIONAL STANDARD OF CLEANUP

- Ref:
- (a) National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 C.F.R. Part 300, Subparts A-D)
 - (b) MC 252 Stage III SCAT--Shoreline Treatment Implementation Framework (both Mobile Sector and Louisiana versions) dated 09 October 2010 and 20 December 2010, respectively
 - (c) Deep Water Horizon Monitoring and Maintenance (M&M) Plan (AL / FL / MS and LA versions) dated 06 December 2010 and 03 February 2011, respectively
 - (d) Deepwater Horizon: 2011 Shoreline Cleanup Assessment Technique (SCAT) Plan for Alabama/Florida/Mississippi dated 11 March 2011
 - (e) Deepwater Horizon 2011 Shoreline Plan for Louisiana (Interim) (not signed by Louisiana State On-Scene Coordinator or by Department of the Interior Trustee) dated 23 March 2011

1. **ISSUE:** This document memorializes the cleanup standard for operational activities during the response. This standard is distinguished from the "No Further Treatment" (NFT) segment designation used in the Shoreline Cleanup and Assessment Technique (SCAT) inspection process.
2. **BACKGROUND:**
 - a. The NFT standard has been created for SCAT for the purpose of determining whether activities pursuant to a particular Shoreline Treatment Recommendation (STR) may be complete. During Stage 3, for example, when a segment meets the NFT criteria, the segment may be transferred to a "Maintenance and Monitoring" status also known as "Stage III.2" and addressed in the UAC Transition Plan. Reference (b), page A-3. It was later defined in Reference (c) as:

NFT 2010 – No Further Treatment in 2010 – Oiling conditions in Stage III.1 that meet NFT 2010 guidelines or require no additional treatment due to safety or environmental benefit in 2010 but will receive winter monitoring as needed and Spring 2011 re-survey.

NFT 2011 guidelines were subsequently established by AL, MS, and FL in Reference (d). NFT 2011 guidelines for Louisiana in were enacted under the interim document, Reference (e).

Subj: OPERATIONAL STANDARD OF CLEANUP

16451

- b. The NFT standard was created to be flexible and varied with the type of shoreline and articulated three unique categories: Sandy Shorelines, Coastal Marshes and Mangroves, and Man-made Shorelines. The Sandy Shorelines category was further divided into four groups: Heavily Oiled Residential Beaches, Heavily Oiled Non-Residential Beaches, Other Oiled Non-Residential Beaches, and Other Oiled Beaches in Special Management Areas. Reference (b), pages 7-9.
2. **DISCUSSION:** While the goal is for segments to meet the appropriate NFT standard under their specific STR, the NFT standard is limited for use by SCAT and the Environmental Section and is not to be used by the Operation Section (OPS). Limitation of removal activities to NFT standards is inefficient and contrary to the FOSC's duty to conduct removal activities under the National Contingency Plan, Reference (a).
 - a. Therefore, the FOSC hereby directs the USCG and BP Operations Section Chiefs, and all personnel under their direction, to cease the use SCAT's NFT designation to define or limit their removal activities. The NFT designation will be reserved for the use of the SCAT teams and the Environmental Section.
 - b. The FOSC has established the following standard of cleanup to be used by the Operations Section while engaged in shoreline cleanup: "MC-252 oil shall be removed to the greatest extent reasonably practicable, using the equipment and cleanup method designated for that area." "Oil" is defined in Reference (a). "Reasonably practicable" shall be determined by the FOSC. Field determinations of what is "reasonably practicable" for the purpose of conducting cleanup activities may be made by USCG representatives on scene, subordinate to the FOSC's authority.
 - c. This decision does not affect Best Management Practices (BMP). BMPs shall remain in effect.
 - d. A segment is eligible for a SCAT inspection when oil to the extent reasonably practicable has been removed from the segment using the designated equipment and cleanup method for that area.
 - e. This decision modifies all Shoreline Treatment Recommendations (STRs) that conflict with it. From the date of the FOSC's signature, all future STRs will be written consistent with this decision. Future STRs will designate cleanup methods and equipment to be used when conducting removal activities, but shall not use SCAT's NFT criteria or any other SCAT survey criteria as an operational standard.

#

2

Attachment 12– Background Oiling

The Area Contingency Plans (ACPs) for the Gulf of Mexico describes the U.S. Coast Guard’s Oil Spill Response Plan. The ACP notes that the NOAA Shoreline Assessment Manual (Manual) states that “Although the highest clean-up endpoint is removal of all visible oil, this is often impossible, particularly if there is a background rate of oil deposition (e.g. natural oil seeps or shipping traffic). In these cases, a more appropriate endpoint would be clean-up of visible oil, but not exceeding the background amount.” The Manual further describes the process for selecting clean-up endpoints. For sand beaches, the Manual suggests that “Clean-up can be terminated when no visible oil remains on the surface, except for scattered tar balls or swash lines of minute tar balls which may occur as the sand is reworked by the waves. All tar balls or tar patties that can be removed by reasonable clean-up techniques, or that can be remobilized, should be removed. Remaining tar balls and tar patties should be at or below normal background frequency.”

Background (non MC-252) oiling is that chronic concentration or frequency of oil residue or tar balls that may be expected to be present on a shoreline over the long term without an acute input (i.e. an oil spill event). “Background” is a function of source and the primary contributions are from:

- River runoff downstream from urban areas;
- Commercial fishing and shipping activities;
- Offshore hydrocarbon production;
- Sea bottom natural hydrocarbon seeps; and
- Prior spill releases

The northern Gulf of Mexico shoreline receives contributions from all of the above sources. In May 2010 prior to MC-252 oil reaching land, SCAT documented over 2,200 instances of tar balls across portions of the MS, AL and FL shorelines as part of their pre-impact surveys prior to MC-252 making landfall. It is important to recognize that prior studies, as well as SCAT Team observations associated with this response, indicate that there is a high degree of variability in the type, size, and distribution of background oiling (i.e. non-MC-252 tar balls) across the AOR.

For sand beaches it can be shown that MC-252 SRBs are 80+% sand, typical tar balls are mostly oil residue with very little sand. This makes determination of MC-252 SRBs relatively easy to do in the field. Between April 3, 2011 and October 7, 2011 SCAT has observed and documented more than 680 occurrences of non-MC-252 tar balls (more than 5,000 individual tar balls) on shorelines of all 4 states.