

Table 1. NCP and HAZWOPER Phases for Oil Spill Response, Recovery, and Cleanup

NCP Phases for Oil Spill Response	OSHA HAZWOPER Phases*
<p>Phase I – Discovery or Notification</p> <p>The person in charge of a vessel or facility reports an oil spill to the National Response Center (NRC). The NRC notifies the predesignated FOSC, who notifies other agencies (e.g., federal, state, local), begins evaluating actions needed, and proceeds according to the ACP.</p>	<p>Emergency Response</p> <p>A threat of an oil spill (uncontrolled release) may trigger HAZWOPER.</p>
<p>Phase II – Preliminary Assessment and Initiation of Action</p> <p>The FOSC initiates a prompt preliminary assessment, using available information and sometimes an on-scene inspection. The FOSC evaluates the magnitude and severity of the oil spill or threat to public health or the environment. The FOSC will identify potentially responsible parties, if possible. The response management framework should be a system (i.e., unified command) that brings together federal, state, and local governments and the responsible party.</p> <p>The FOSC may allow the responsible party to conduct removal actions, and must ensure proper oversight of the response operations. In carrying out an oil spill response, the FOSC may:</p> <ul style="list-style-type: none"> • Remove or arrange for the removal of a discharge; • Mitigate or prevent a substantial threat of a discharge; • Direct or monitor all federal, state, and private actions; and • Remove and, if necessary, destroy a vessel discharging, or threatening to discharge. 	<p>Emergency Response</p> <p>Oil spill response actions related to stopping the oil spill or removing the spilled oil are considered “emergency response” activities under HAZWOPER.</p> <p>If workers are participating in an oil spill response action under the NCP, the employer must have an occupational safety and health program consistent with HAZWOPER and must train workers according to HAZWOPER’s training requirements.</p>
<p>Phase III – Containment, Countermeasures, Cleanup, and Disposal</p> <p>Defensive actions should begin as soon as possible to prevent, minimize, or mitigate threats to public health or the environment. Such actions may include analyzing samples, controlling the source of the discharge, placement of physical barriers to deter the spread of oil, and the use of chemicals (e.g., dispersants) and other materials to restrain the spread of the oil and mitigate its effects.</p> <p>The FOSC will ensure that appropriate actions are taken to recover the oil or mitigate its effects. The oil and contaminated materials recovered in cleanup operations must be disposed of properly.</p>	<p>Emergency Response</p> <p>Response actions for oil spill containment and countermeasures are covered under HAZWOPER.</p> <p>Post-emergency Response</p> <p>Oil spill cleanup sites may be considered or may become hazardous waste sites and should follow the requirements for hazardous waste sites under HAZWOPER, requiring specific training and control measures, if certain criteria apply. Workers who participate ONLY in post-emergency response require different training than emergency response workers receive.</p> <p>For large oil spills, emergency response and post-emergency response phases may be managed differently and may occur at the same time.</p>
<p>Phase IV – Documentation and Cost Recovery</p> <p>The FOSC ensures the necessary collection and maintenance of information, samples, and reports to document response actions. The FOSC transmits Information and reports to the appropriate offices responsible for follow-up actions.</p>	<p>HAZWOPER does not apply.</p>