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## Status and Background of the Spill Prevention Control and Counter-measure Rule

***Introduction***

The Spill Prevention Control and Countermeasure (SPCC) rule can be found in Title 40 of the Code of Federal Regulations (CFR), Part 112 (Oil Pollution Prevention). The original 1973 SPCC regulation first became effective on January 10, 1974, under the Clean Water Act (CWA). The rule applies to owners or operators of facilities that store or use oil and oil products and who could discharge oil in amounts that may harm navigable waters or adjoining shorelines. A revision to the rule has been proposed; however, the rule revision was signed by Carol Browner on January 10, 2001, but was never published due to action of the current administration. It is not in effect, and is therefore, not the law. EPA does not know when or if it will be published.

## About The Update

EPA's *Oil Spill Program Update* is produced quarterly, using information provided by EPA Regional staff, and in accordance with Regions' information needs. The goal of the Update is to provide straight-forward information to keep EPA Regional staff, other federal agencies and departments, industries and businesses, and the regulated community current with the latest developments. The Update is available on the Oil Program homepage at ***www.epa.gov/oilspill.***

***Background of the Oil Pollution Prevention Regulation***

The goal of the oil pollution prevention regulation in 40 CFR Part 112 is to prevent oil discharges from reaching navigable waters of the United States or adjoining shorelines. The rule was also written to ensure effective responses to oil discharges. The rule further specifies that proactive, and not passive, measures be used to respond to oil discharges.

The oil pollution regulation contains two major types of requirements: prevention requirements (SPCC rule) and facility response plan (FRP) requirements. The prevention requirements in Sections 112.1 through 112.7 were first promulgated in the 1973 SPCC regulation. Required under the rule is an SPCC Plan, that contains measures to prevent and control oil spills, including those resulting from human operational error or equipment failures.

***Reasons for Proposed Changes***

The impetus behind the proposed SPCC changes is manifold. First, the proposed changes stem from the need to clarify the language and organization of the rule. The proposed changes comply with the Presidential order requiring that all new rules or rule amendments be drafted in plain language. The proposed changes would reduce the information collection on the regulated community.

**Highlights of Proposed Rule Revisions**

- **Exempts facilities with completely buried storage tanks regulated under 40 CFR Parts 280 or 281;**
- **Establishes a de minimis container size of 55 gallons;**
- **Establishes an aboveground storage capacity threshold of more than 1,320 gallons and removes the 660 gallon provision;**
- **Revises the threshold for reporting discharges to EPA to over 42 gallons combined in 2 discharges in any 12-month period;**
- **Allows deviations when equivalent environmental protection is provided;**
- **Provides for a flexible plan format, with a cross-reference showing that all regulatory requirements are met; and**
- **Extends applicability to the storage and operational use of oil.**

The proposed SPCC changes would reduce the regulatory burden by approximately 40 percent. The proposed changes would eliminate duplicate regulation, exempt certain small facilities, and require consideration of industry standards in prevention plans. In most cases, the proposed rule would also allow an owner or operator to substitute a required measure for another providing equivalent environmental protection. The number of facilities now regulated by the SPCC rule would be reduced by about 51,500 facilities as a result of the proposed changes.

***General Applicability***

The current SPCC rule applies to owners or operators of facilities that drill, produce, gather, store, use, process, refine, transfer, distribute, or consume oil and oil products. The revisions clarify applicability to owners or operators that use oil in quantities that may be harmful. The revisions also track the scope of the rule to conform with the expanded jurisdiction of the amended CWA. The broadened range includes waters of the contiguous zone and waters connected with activity under the Outer Continental Shelf Lands Act or Deepwater Port Act, as well as waters affecting certain natural resources of the United States.

*Region 4 PREP Exercise in Leland, North Carolina*

***Summary***

If the final SPCC rule is published in the Federal Register, its effect is expected to be positive. The revised rule would not only be more understandable than the present rule, but reduce the number of facilities regulated and the overall regulatory burden.

## PREP Exercise - Region IV

On October 18, 2000, EPA Region IV conducted an unannounced government Preparedness for Response Exercise Program (PREP) drill at the P&W Waste Oil Facility in Leland, North Carolina. The PREP exercise was conducted as a follow-up action after a Facility Response Plan/Spill Prevention Control and Countermeasure (FRP/SPCC) inspection on June 27, 2000, revealed major preparedness and structural issues at the facility, which is located near the Cape Fear River. The purpose of this exercise was to verify that the company is prepared to implement the procedures and deploy the equipment identified in its FRP and to initiate an immediate and effective response to an actual incident.

Charles Fitzsimmons, the On-Scene Coordinator (OSC), and other Region IV personnel planned an exercise scenario for the facility. The scenario involved a discharge of 36,000 gallons of waste oil as a result of vandalism, directly impacting the Cape Fear River. At a pre-exercise meeting on October 18, 2000, OSC Fitzsimmons reviewed the scenario response with all participants, excluding the facility.

The participants then proceeded to the facility and announced the scenario. While the OSC and the U.S. Coast Guard Marine Safety Office (USCG MSO) personnel jointly described the scenario and observed the follow-up coordination and notifications implementation, MSO personnel observed any health and safety issues. State water quality personnel observed from the river the deployment of contractor resources, including boats, and boom and skimming equipment.

The exercise highlighted several of the facility's internal and external problems. Internal problems included inaccurate phone numbers on the call list, inability to contact the qualified individual (QI), confusion regarding initial coordination of facility manpower, and little or no threat assessment. External problems included lack of ability to direct the Oil Spill Response Organization (OSRO), apparent lack of coordination between the contractor and the QI, and delayed response time for deployment of contractor resources due to an unusable local boat ramp.

The after-exercise "hot wash," with input from all participants, provided a valuable report to the facility and also the participating agencies. USCG discussed the noted health and safety issues, and the state water quality personnel provided good technical advice, while recognizing their role of support to the federal OSC. During an actual release, the OSC would probably assume coordination control and direction of the overall response of an actual incident, but the exercise helped the QI realize that a spill of this magnitude would require refinement of their coordination skills. The QI also became acutely aware that the FRP must be reviewed routinely with the OSRO at his facility.

For more information, please contact OSC Charles Fitzsimmons of EPA Region IV at (404) 562-8773.

## Solano Way Oil Spill

On December 12, 2000, a Petroleum pipeline ruptured adjacent to a marsh in the San Francisco Bay area, spilling hydrocarbons into the Pacheco Slough tidal system. Since the spill's discovery, over 100,000 gallons of contaminated water and 31 bins of contaminated soils have been removed from the area. Oil Spill Response Organization (OSRO) contractors, under the auspices of federal and state agencies, responded to the spill to further mitigate its impacts and limit the threat of pollution migration during the rainy season.

The spill occurred on a wetland area located next to Waterfront Road, along a corridor laden with underground pipelines owned by several different pipeline companies and utilities, including Ultramar Refinery, Equilon, Kinder Morgan, and PG&E. The pipeline discharge, identified as gasoline, was contained in a marshy ditch between railroad tracks and Waterfront Road. Petroleum product continued to surface in the spill area and along the ditch below the railroad trestle. Both the ditch and marsh are tidal systems with outgoing flows reaching the Pacheco Slough, which is 1/4 mile away. No petroleum product was found in the Pacheco Slough or in any waters leading to the San Francisco Bay.

OSRO contractors, including the Clean Bay Consortium, ARB, Universal Environmental, and Onyx Environmental, performed removal actions in coordination with the California Department of Fish and Game, the Oil Spill Prevention and Response Office (OSPR), the California Regional Water Quality Control Board (RWQCB), and a Superfund Technical and Response Team (START). Efforts included the use of booms to contain the oil in the ditch, sand bags to isolate the spill from the tidal waters, and vacuum trucks to remove and transfer the oil/water mixture from the ditch to Kinder Morgan on-site storage tanks. Groundwater samples collected along the boundary of the spill area indicate low levels of hydrocarbon contamination. Iron bacteria, occurring naturally at the site, apparently aided in the breakdown of the spilled low level petroleum product.

On January 5, 2001, Kinder Morgan submitted to authorities an Incident Action Plan with the goal of preventing clean water from reaching and spreading the contamination. The plan involved back filling low lying areas, installing a visqueen cover, constructing underflow piping to divert surface water, excavating stained soil, and monitoring the site before and during rain events. Contaminated soils and equipment will be disposed of at the Ford Landfill. Kinder Morgan will be required to obtain approvals from the RWQCB and the county for contaminated water disposal from the site.

RWQCB has required Kinder Morgan to continuously assess the soil and groundwater contamination in the hot zone. In addition, OSPR has set up mammal traps to determine animal densities in the area to further assess natural resource damages.

For more information, contact the On-Scene Coordinator, Steve Calanog, at (415) 744-2327.

## Oil Spill Exercise Generator Software is Now Available

The Environmental Protection Agency's Software for Environmental Protection Office is introducing the Oil Spill Exercise Generator Software (OILSPILL). This database-driven program, developed by EPA Region 5 and Purdue University, allows users to construct an oil spill exercise or response drill in a matter of hours, and to fill out checklists for use in a final evaluation report.

The software is intended to fill a specific need in the development and evaluation of exercises and/or response drills. With appropriate inputs, the program will write a scenario, provide canned weather conditions, and provide inputs or messages to move the exercise along. The user is given the opportunity to customize scenarios and messages in order to suit his/her specific situation. The program also provides seasonal weather data for all of the United States, its Territories, and Canada, and can be modified to meet the needs of the user.

The OILSPILL program also has the advantage of including evaluation checklists for each of the elements listed in the National Preparedness for Response Exercise Program (PREP). Evaluators can fill out these forms by hand or electronically, and then transfer the text into a word processor for use in an evaluation report.

While this program provides the necessary tools for an evaluator to use, it does not replace a knowledgable and independent evaluator.

The complex matrix of facts that drive decision-making, and the final distinction between decisions made and not made, are best overseen by an evaluator.

You can read more about the program, download the manual, and place an order at the USEPA Software for Environmental Protection Web site at ***www.epa.gov/seahome***.

## 2001 International Oil Spill Conference And Exhibition

The 17 th Biennial International Oil Spill Conference (IOSC) was held March 26-29 at the Tampa Convention Center in Tampa, Florida. Poster, panel, and special sessions along with exhibits provided thoughtful and outstanding perspectives on this year's theme, "Global Strategies for Prevention, Preparedness, Response, and Restoration." The IOSC was jointly sponsored by the U.S. EPA, U.S. Coast Guard, the American Petroleum Institute, the International Maritime Organization, and the International Petroleum Industry Environmental Conservation Association.

The conference attracted nearly 2,000 participants from 50 countries. Over 200 exhibits of materials, equipment, and services from United States and foreign companies, institutions, and government agencies involved in the manufacture, sale, regulation, and use of products of the oil industry were on display in the conference trade exhibition. Scott Carpenter, a renown aerospace and ocean engineer, and Stephan P. Leatherman, the nation's foremost authority on beach quality and coastal erosion, were featured speakers at the conference.

EPA's Office of Emergency and Remedial Response participated in several panels and presented papers in various sessions. Some highlights included Steve Luftig and David López as members of the opening plenary session discussing the future of OPA '90; Bud Hunt, Ray Worley, Nick Nichols and Beatriz Oliveira made presentations on Response Plans for Animal Fat and Vegetable Oil Facilities, The National Problem of Oil Wells Fields and Geographic Information System Standards for the U.S. EPA's Oil Spill Program, The NCP Product Schedule, and the Freshwater Spills Symposium, respectively. In addition several Oil Program Center members served as session chairpersons including Hugo Fleischman, Ray Worley, and Bud Hunt. Nick Nichols was chairperson of the poster sessions, coordinating the delivery of more than 100 poster presentations during the conference. The EPA Oil Program Center also displayed their booth and distributed outreach materials. For more information, contact Nick Nichols, (703) 603-9918 or Beatriz Oliveira, (703) 603-1229.

## Companies Volunteer to Clean Up Tank Emissions

In accordance with an agreement between EPA and the American Petroleum Institute (API), 61 companies nationwide have agreed to install greater emission controls on approximately 866 aboveground storage tanks fitted with "slotted guide poles." The guide poles are slender columns built on the inside of tanks that allow for fuel sampling and drainage. While guide poles enable accurate sampling for the purpose of environmental compliance, they also allow the release of volatile organic compounds (VOCs) into the air. Consequently, EPA had previously determined that slotted guide poles have observable emission pathways that violate federal new source standards under the Clean Air Act.

The agreement is part of the Storage Tank Emission Reduction Program, and is expected to reduce VOCs by 2,000 tons each year - the equivalent of removing 76,000 cars from the nation's roads. VOCs are known to be key contributors to ground-level ozone, or smog, which can decrease lung function and aggravate respiratory problems. The agreement includes companies with aboveground storage tanks that store substantial quantities of volatile organic liquids, including petroleum products.

In return for their participation with this agreement, EPA has agreed to eliminate any penalty obligations for companies that agree to audit, disclose, and correct leaks from tanks fitted with slotted guide poles. Participating companies agreed to register their intent to comply and to submit participation

agreements. The agreement allows companies to fit their aboveground storage tanks with appropriate emissions controls devices until June 13, 2002, but will allow more time for any tanks that must be taken out of service in order to install these devices.

The agreement is an example of the environmental benefits that result from EPA and industry cooperation, and may serve as a model for future agreements. Details of this program were published in the Federal Register on January 14, 2001.

## Recent Spills

***Yaquina River Oil Spill***

In the early hours of January 27, 2001, a tanker truck accident on Highway 20, near Toledo, Oregon resulted in the discharge of approximately 5,800 gallons of No. 6 fuel oil in an area directly adjacent to the Yaquina River. A significant amount entered the river. The driver from Blue Line Transportation was killed in the accident.

Approximately 3,500 gallons of oil were collected for disposal and recycling immediately after the spill. In addition, approximately 120 yards of oil soaked soil were excavated and removed. A total of 4,200 feet of boom were deployed and nine yards of pompoms were collected and removed, before operations were scaled-back due to high level winds and heavy rains.

Incident response members included EPA, the U.S. Coast Guard, the Oregon Department of Environmental Quality (DEQ), Blue Line Transportation, the Oregon Department of Fish and Wildlife (ODFW), the Oregon Department of Transportation, the U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration.

The spill threatened a variety of species, including salmon, beaver, otters, eagles, osprey, ducks, and geese. Recovery measures needed to be conducted with care to avoid harming delicate salmon spawning beds and to minimize further damage to the resource.

***Mississippi River Oil Spill***

On November 29, 2000, the 800-foot tanker Westchester lost power and ran aground, spilling 546,000 gallons of crude oil into the Mississippi River 60 miles south of New Orleans. A 26-mile stretch of the busy shipping route was closed as a result, and later reopened to one-way traffic.

Clean-up efforts were aided by a timely wind shift, which pushed the spill away from a Mississippi River wildlife refuge. The oil was contained by 30,000 feet of boom and collected by vacuum pumps affixed to barges. Jimmy Jenkins, secretary of the state Department of Wildlife and Fisheries, spoke of the incident, " We dodged the bullet...In my humble opinion, we're not looking at a whole lot of damage."

The spill posed a remote threat to half of Louisiana's oyster beds at the height of the oyster-farming season. Although there have been no reports of oyster bed contamination at this time, oyster farmers did lose money during the clean-up period due to lock closures, which kept them from getting to their oyster beds.

The tanker's operator, ERMIS Maritime Corp. of Greece, is not expected to be cited by the state if there is no lasting environmental damage.

***Tank Spills 60,000 Gallons of Gas in Montana***

On December 13, 2000, sixty thousand gallons of gasoline spilled from a Conoco storage tank, forcing the evacuation of residences and businesses in Helena, Montana. According to a Conoco spokesman, the spilt fuel remained contained within a protective berm surrounding the tank. County officials reported that gasoline had initially spilled from two overflow holes at the top of the storage tank.

Over 100 residents living within a half-mile radius of the facility were evacuated from the area.

A fire suppression foam was sprayed on the spill to reduce the threat of fire or explosion during cleanup. A nearby highway was closed shortly after motorists complained of fumes strong enough to bring tears to their eyes. Planes were temporarily barred from the airspace above the plant, and Montana Rail Link halted its trains from entering the area to avoid sparks.

***Oil Wells in Los Angeles***

In Los Angeles, the oil industry has developed creative facades to mask oil operations occurring amid the glamour of Beverly Hills. In southern California, where over 9 million residents live on the third largest oil field in the country, the oil industry has been forced to adapted several strategies seeking to minimize the impacts of their operations on other land uses.

Seeking to improve the appearance

of oil wells and minimize pump noise, the oil industry has responded in a variety of ways. For example, on Olympic Boulevard in Beverly Hills, the Venoco oil company has built a 16-story tower covered with vinyl material painted in a floral design to hide a well. The so called "Tower of Hope" rises above the Beverly Hills High School football field, and was painted by terminally ill children. Venoco has a total of 14 active wells at its Olympic Boulevard site. One of the wells extends a mile and a half under a tony shopping district along Rodeo Drive. "They don't even realize that there is an oil field here," said Bill Giardino production foreman of Veneco's Olympic Boulevard facility.

Just off the coast of Long Beach on Island White, one of four islands built in the 1960s for oil production, an 18-story production platform is covered by a sheet metal skin with horizontal panels attached to look like terraces. Tom Hoy, of the City of Long Beach's Department of Oil Properties, commented, "We just have what we hope is an appearance that will be appealing to the people who use the waterways out here and who live along the shoreline." Island White also boasts a manmade waterfall, landscaping of banana and palm trees, and a couple of high curved cement walls that shield the Long Beach shorelines.

Oil wells operating along freeways, in public parks, and nestled between apartment buildings throughout Los Angeles, are increasingly the domain of small oil operations. Part of their business involves collecting oil seeps in parking lots at several downtown locations. Industry officials maintain that, if they were not pumping oil from the ground, oil seeps and methane buildup would be more of a problem. Environmental officials say there are more than 30 oil seeps in the western part of Los Angeles alone. State officials say the oil industry coexists nicely with its neighbors for the most part.

## Recent Civil Actions Under the Clean Water Act

Increasingly, Clean Water Act (CWA) violations are being enforced through the U.S. Department of Justice (DOJ). In November 2000 and January 2001, lawsuits have been filed that specifically address the release of petroleum products into waterways. While each lawsuits seeks slightly different corrective actions and penalties, they both share similarities.

In both the Colonial Pipeline Company (Colonial) and Garcia Auto Parts (Garcia) cases, significant penalties are being sought under the CWA. DOJ hopes the penalties will act as a stimulus for compliance with the Act. Under the CWA, a company may be fined civil penalties of up to $27,500 for each day of violation or between $1,000 and $3,000 per barrel of oil spilled.

***Complaint Against Garcia Auto Parts***

A salvage yard in the District of Columbia is faced with a civil action brought in January 2001 by DOJ. As a follow-up to an investigation conducted by EPA and the District of Columbia, Garcia Auto Parts has been charged with the continual discharge of polluted storm water into the District of Columbia sewer system without a National Pollution Discharge Elimination System (NPDES) permit as required under the Clean Water Act (CWA). Even though EPA issued an administrative order requiring Garcia to implement a storm water control plan and obtain a permit, the company has not complied.

The polluted storm water contains motor oil, lead from batteries, organic plastics, and other hazardous materials. The polluted water is fed from the sewer system into Hickey Run, a tributary of the Anacostia River. The Anacostia is used for recreation and is a principal tributary to the Potomac River and Chesapeake Bay. Polluted storm water has plagued the Anacostia for years, causing an increased emphasis on local industries having adequate storm water management plans.

The complaint seeks that Garcia obtain an NPDES storm water permit from EPA, and injunctive relief to require alleviation of hazardous conditions caused by the discharge of automotive fluids and other contaminants into storm

water drains. Owners of industrial or construction operations of five acres or more are required to obtain an NPDES permit before discharging storm water runoff into waterways. Each permit must also include a storm water pollution prevention plan that addresses oil spill prevention, shelter of waste from rain, and employee training.

***Colonial Pipeline Lawsuit***

On November 28, 2000, legal action was taken by EPA against the Atlanta-based Colonial Pipeline Company for alleged violations of the CWA. Colonial had reportedly spilled 3 million gallons of oil and petroleum products in nine states spanning its pipeline that runs 5,300 miles from Port Arthur, Texas to Linden, New Jersey. The Colonial Pipeline Company is the world's largest pipeline transporter of refined petroleum products by volume.

Spills from the Colonial pipeline may put the many rivers, streams, and wetlands that it crosses at risk. For over 20 years, corrosion, mechanical damage, and operator error have caused spills in 10 states throughout the South and East. One diesel fuel spill into South Carolina's Reedy River spewed nearly a million gallons over 34 miles and killed 35,000 fish.

In addition to monetary fines, EPA is pressing that the court order Colonial to take preventative measures. If EPA is successful, Colonial may have to address exposed and shallow pipe, as well as inspect the pipeline and repair any identified defects. EPA further requests that Colonial Pipeline upgrade the cathodic protection system to control corrosion and upgrade their leak detection system and strategy.

***Summary***

Federal court actions are not limited only to large-scale companies such as the Colonial Pipeline Company, but also extend to lower-volume companies such as Garcia Auto Parts. EPA's goal is to pursue all violators equally. After all, it is the size and nature of the oil spill that affects the environment, and not the size of the company.

*Courtesy of Tanks Direct*

*Aboveground storage tanks affected by new STI standard.*

## New STI Standard SP001-00

***"Inspection of Shop Fabricated ASTs"***

In November 2000, the Steel Tank Institute (STI) released the new Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks (ASTs) for Storage of Combustible and Flammable Liquids (STI Standard SP001-00). This is one of two tank inspection standards that will be cited by the revised Spill Prevention Control and Countermeasure (SPCC) Plan final rule, expected by the end of 2001. EPA requested the development of the standard in response to proposed tank inspection requirements that will be mandatory in a tank owner's SPCC Plan. The new standard covers the inspection of smaller, shop-fabricated, steel ASTs, generally manufactured to standards such as Underwriters Laboratories UL 142 or UL 2085, and are intended for storage of noncorrosive, stable, flammable, and combustible liquids having a specific gravity not exceeding that of water. The inspection will determine the condition of the tank and whether it is leaking. For more information, contact STI by mail at 560 Oakwood Road, Lake Zurich, IL 60047, by phone at (847) 438-8265, by fax at (847) 438-8766, or at its Web site at ***www.steeltank.com***.

*Courtesy of Tanks Direct*

## OSC Task Force Training in Phoenix

The Fourth Annual On-Scene Coordinator (OSC) Readiness Training took place in Phoenix, Arizona from November 13 - 17, 2000. Nick Nichols, Bud Hunt, Mark Howard, and Ray Worley presented five classes along with Regional EPA Oil Program and OSC instructors.

The Inland Oil Resources Financial Management course provided OSCs and Oil Program personnel with an understanding of the elements of financial management that are essential in effectively

implementing our response program. It also discussed funding options under the Oil Spill Liability Trust Fund and requirements for cost documentation.

The Alternative Countermeasures For Oil Spills course profiled three Regions' efforts to cleanup oil spills with alternative techniques, such as bioremediation and in-situ burning. The National Contingency Plan Product Schedule and its application to area planning and emergency response decision making were discussed.

The Area Planning workshop covered various ways in which an OSC can develop a basic area plan. The workshop will present examples from EPA Regions V, VIII, and X of the various approaches OSCs have taken as they worked on sub-area plans, as well as advanced planning and exercises used to test plans.

The SPCC/FRP-The New Rules course gave a broad overview of the existing SPCC/FRP regulations as well as a discussion of the proposed rule changes currently being examined by OMB. Topics included breakout storage tanks, jurisdiction issues, expedited enforcement program, unannounced drills, and essential facility inspection techniques.

The Fuels Management course provided a comprehensive view of the fuels industry, including production fields, pipelines, refineries, terminals, service stations, tankers, rail and truck transport, and chemical plants. There was a discussion of EPA regulatory approaches to solving the environmental problems associated with the entire industry and how trends in industry will affect enforcement in the future.

All classes were well attended, and course evaluations from the federal OSCs, state and local officials, and other federal agencies were very positive. EPA's Oil Program continues to update and improve these popular classes that provide OSCs with the tools and information they need to prevent, prepare, and respond to oil spill incidents.

## Upcoming Events

**Inland Oil Course: Slow & Backwater Booming**
**May 21 - 24**
**Anchorage, Alaska**

The slow and backwater practical course is a hands-on demonstration of oil recovery methods in slow water and marsh environments. Additional emphasis is placed on product recovery techniques in the subsurface in order to prevent discharges to waterways. The course it taught by current and former EPA and state responders. Participants will be instructed on safe boat handling techniques, boom deployment, and proper recovery methods. Instruction will be provided on proper containment practices for spills on land. Minimal classroom instruction with strenuous field exercises compose the curriculum.

A course prerequisite is to have attended the ERT's Inland Oil Spills course. For additional information, please contact Greg Powell at (513) 569-7537 or Dick Brophy at (513) 521-2730.

***Funds Use Seminars***

**May 1 - 2, 2001**
**Corpus Christi, Texas**

**June 26 - 27, 2001**
**Portland, Oregon**

The U.S. Coast Guard's National Pollution Funds Center (NPFC) two-day Funds Use Seminar has been expanded to four concurrent sessions that cover a broad array of topics that include financial management, Coast Guard and EPA cost documentation, claims, certificates of financial responsibilities, state removal cost claims, contracting, natural resource damage claims, an integrated natural resource damage case study, and on-shore facility response issues with case studies.

Registration information is available on the NPFC Web site at ***www.uscg.mil/hq/npfc/npfc.htm***. For additional information, please contact Jan Vorhees at (202) 493-6719.

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