



**Memorandum Of Understanding**

**Among**

**U.S. Coast Guard District 1 (USCG)**

**and**

**U.S. Environmental Protection Agency Region I (EPA)**

**and**

**U.S. Department of the Interior (DOI)**

**and**

**U.S. Department of Commerce /**

**National Oceanic and Atmospheric Administration (DOC/NOAA)**

**and**

**State of Maine (ME) Department of Environmental Protection**

**and**

**Commonwealth of Massachusetts (MA)**

**Executive Office of Environmental Affairs**

**and**

**State of New Hampshire (NH) Department of Environmental Services**

**and**

**State of Rhode Island and Providence Plantations (RI)**

**Department of Environmental Management**

**and**

**State of Vermont (VT) Agency of Natural Resources**

**PURPOSE**

The USCG, EPA, DOI, DOC/NOAA and the States of ME, MA, NH, RI, and VT recognize that the effectiveness of physical removal of spilled oil may be limited by the dynamic nature of the environment in which the oil is spilled. In such circumstances, timely and effective containment, collection, and mechanical removal of the oil may not provide an adequate response. The burning of oil in place as a removal technique (*in-situ* burning), alone



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or in conjunction with mechanical removal methods and/or chemical countermeasures, may be considered as a means to enhance removal and reduce harm to public health and welfare, or the environment.

This Memorandum of Understanding (memorandum) is designed to implement sections of the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan) [40 CFR §300.210 (c)(4)(ii)(D) and §300.115 (a)] and the requirements of 33 USC 1321 (j)(4)(B)(ii), the Federal Water Pollution Control Act, as amended by the Oil Pollution Act of 1990. This memorandum provides the primary decision makers in oil spill response (the Federal On-Scene Coordinator (OSC) and the State On-Scene Coordinator (SOSC)) with the authority to use *in-situ* burning in certain zones under the jurisdiction of the Region I Regional Response Team without additional consultation or concurrence. The Responsible Party, another key player in spill response, will also be a part of the decision-making process.

Because the jurisdictional boundary between Regions I and II divides Long Island Sound, the State of Connecticut will pursue a separate agreement on the use of this technique. When developed, this agreement will be included in Appendix III, Boundary Area Guidance and Agreements. References to Region I throughout this document apply to all Region I states except Connecticut.

This memorandum constitutes consultation under the National Contingency Plan with DOC/NOAA and DOI for the use of *in-situ* burning as an oil spill removal technique in the “B” Zone and consultation with DOC/NOAA and DOI, and concurrence of the States of ME, MA, NH, and RI in the “A” Zone (both zones defined under **Scope** below). It is anticipated an ignition source will be sufficient to light oil that is inherently combustible, provided a spill receives timely response action. This memorandum applies to *in-situ* burns that are lit using ignition sources (e.g., small quantities of burning gelled gasoline or kerosene released from a helotorch or a hand-held ignition pack). This memorandum does not apply to *in-situ* burns where the combustibility of the oil must be enhanced using a burning agent (e.g., through the direct addition of a flammable hydrocarbon prior to ignition or the addition of a wicking agent to enhance combustibility). Use of burning agents to enhance the combustibility of oil is subject to the approval requirements described in Subpart J of the National Contingency Plan (§300.910(c)).

This memorandum applies only to response operations within Region I where federal assistance is required. This agreement does not expand or otherwise modify the jurisdiction of any of the signatories to this agreement in matters that are the subject of this agreement.



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This memorandum will be incorporated into the Region I Regional Contingency Plan and Area Contingency Plans within Region I.

**AUTHORITY**

Subpart C of the National Contingency Plan directs the Regional Response Teams to conduct regional planning and coordination of preparedness and response actions in conjunction with Area Committees in the case of oil discharges. Area Contingency Plans, written by Area Committees, should provide pre-approval of specific countermeasures or removal actions that, if expeditiously applied, will minimize adverse spill-induced impacts to fish and wildlife resources, their habitat, and other sensitive environments. (40 CFR §300.210 (c) (4) (ii) (D)).

Commandant, USCG, has designated the USCG Captains Of The Port (as defined in 33 CFR Part 3) as the OSCs for coastal oil discharges (subject to joint response boundary agreements with EPA), and has delegated to these OSCs the authority and responsibility for compliance with the Federal Water Pollution Control Act and its amendments (33 USC 1221, et seq., as amended).

The U.S. EPA Administrator has designated EPA Regional Administrators as OSCs for inland oil discharges (subject to joint response boundary agreements with USCG), and has delegated to these OSCs the authority and responsibility for compliance with the Federal Water Pollution Control Act and its amendments (33 USC 1221, et seq., as amended). EPA Regional Administrators have further delegated the duties of OSC to members of their Regional staffs.

The DOI and DOC/NOAA are designated federal trustees of certain natural resources under Subpart G of the National Contingency Plan and are to be consulted regarding appropriate removal actions in an oil spill, including the determination to burn oil *in-situ* in United States waters, and must concur with pre-approval plans for the application of specific countermeasures or removal actions (Subpart C of the National Contingency Plan).

In the State of Maine, the State Oil Spill Coordinator from the Department of Environmental Protection has the authority to approve the use of *in-situ* burning for the control of oil spills.



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In the Commonwealth of Massachusetts, the Department of Environmental Protection has the authority to approve the use of *in-situ* burning for the control of oil spills.

In the State of New Hampshire, the Commissioner of the Department of Environmental Services has the authority to approve the use of *in-situ* burning for the control of oil spills.

In the State of Rhode Island and Providence Plantations, the Commissioner of the Department of Environmental Management has the authority to approve the use of *in-situ* burning for the control of oil spills.

In the State of Vermont, the Secretary of the Department of Environmental Conservation has the authority to approve the use of *in-situ* burning for the control of oil spills.

### **SCOPE**

This memorandum establishes decision authority for use of *in-situ* burning (absent the use of burning agents) within zones within Region I. The geographic zones and conditions are described below, and a map of the zones is attached as Appendix II.

#### **1) “A” Zones — OSC decision to burn**

##### **Geographic Scope:**

Zone “A” is defined as all waters subject to the jurisdiction of the United States located seaward of a line measured six miles from the mean low waterline along the coasts and islands of ME, MA, NH, and RI, that are not specifically defined as “Special Consideration Areas” (see paragraph 4 below).

##### **Approval for *in-situ* burning in Zone “A”:**

Within Zone “A,” the decision to use *in-situ* burning rests solely with the OSC. No further concurrence or consultation on the part of the OSC is required with EPA, DOC/NOAA, DOI, or the states of ME, MA, NH, and RI (*please refer to Special Consideration Areas that modify the "A" zone*). However, if threatened or endangered species are present in the immediate burn area, the trustee agency for that species must be consulted prior to initiating burning operations.



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The OSC will immediately notify EPA, DOC/NOAA, DOI, and the applicable state(s) of a decision to conduct burning within the “A” zone via each agency’s Regional Response Team representative.

**2) “B” Zones — Unified Command decision to burn**

**Geographic Scope:**

Zone “B” is defined as all waters subject to the jurisdiction of the United States located seaward of a line measured one mile and terminating six miles from the mean low water line along the coasts and islands of ME, MA, NH, and RI, that are not specifically defined as Special Consideration Areas (see paragraph 4 below).

**Approval for *in-situ* burning in Zone “B”:**

Within Zone “B,” the decision to use *in-situ* burning rests with the OSC and SOSC(s) within the Unified Command. Cases may arise where a state potentially affected by a smoke plume is not represented in the Unified Command because it may not be affected by the unburned oil. Therefore, the SOSC(s) from the state(s) within 6 miles of the burn source must also concur with the decision to burn (unless a Special Consideration Area has been established to reduce this distance). In Zone “B” no further concurrence or consultation on the part of the OSC is required with EPA, DOC/NOAA, DOI, or other states not within 6 miles of the burn source. If threatened or endangered species are present in the immediate burn area, the trustee agency for that species must be consulted prior to initiating burning operations. The SOSC is responsible for any additional concurrence/consultation requirements that apply at the state level.

The OSC will immediately notify EPA, DOC/NOAA, DOI, and applicable state(s) of a decision to conduct burning within the “B” zone via each agency’s Regional Response Team representative.

**3) “C” Zones — Unified Command decision to burn following additional consultations/concurrence**

**Geographic Scope:**

Zone “C” is defined as waters and lands subject to the jurisdiction of the United States and within the geographic responsibility of Regional Response Team I that are shoreward of a line measured 1 mile seaward of the mean low water mark along the coasts and islands of ME, MA, NH, and RI, that are not specifically defined as Special Consideration Areas (see paragraph 4 below).



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**Approval for *in-situ* burning in Zone “C”:**

Within Zone “C,” the decision to use *in-situ* burning rests with the OSC (USCG or EPA) and SOSC(s) within the Unified Command. The OSC must consult with DOC/NOAA and DOI on the appropriateness of *in-situ* burning as a removal action, and gain concurrence of states with land within 6 miles of the burn source (unless this distance has been reduced in a Special Consideration Area). The SOSC is responsible for any additional concurrence/consultation requirements that apply at the state level.

The OSC will immediately notify EPA, DOC/NOAA, DOI, and applicable state(s) of a decision to initiate a burn within the “C” zone via each agency’s Regional Response Team representative.

**4) “Special Consideration Areas”**

**Geographic Scope:**

Special Consideration Areas are specific geographic areas where the level of approval/concurrence granted in Zones “A,” “B,” and “C” is modified by the any of the following agencies/entities within their authority, jurisdiction, and areas of responsibility: Area Committees, pre-designated OSCs, DOC/NOAA, DOI, and the states of ME, MA, NH, RI, and VT. These areas will be identified in writing to the Regional Response Team co-chairs and listed in Appendix I. Upon receipt of a Special Consideration Area, the Regional Response Team co-chairs shall solicit comments from signatories to this memorandum with jurisdiction over the area and any areas within 6 miles of the Special Consideration Area. Absent objection, Special Consideration Areas are effective 30 days from their receipt by the Regional Response Team co-chairs.

**Approval for *in-situ* burning in Special Consideration Areas**

Each defined Special Consideration Area shall contain specific restrictions or permissions that alter pre-approval or pre-consultation otherwise defined by this memorandum in Zones “A,” “B,” or “C”. The restriction placed or authority granted by a Special Consideration Area may be defined to apply only under certain conditions, such as certain wind directions or in certain seasons. Special Consideration Areas shall specify what additional or lesser action, consultation, or concurrence is necessary to proceed with *in-situ* burning in that area. Means of contacting primary or alternate points-of-contact for Special Consideration Areas should be identified for work and non-working hours.

**5) Boundary Areas - Region I Boundary**



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In areas where burning will have an impact across a Region I border into Canada or Region II (e.g., within 6 miles of the border), the concurrence of the applicable parties on the opposite side of the border must be obtained prior to use of *in-situ* burning. Specific cross-border guidance documents and agreements regarding near-border *in-situ* burning, when developed, will be included in Appendix III.



## PROTOCOLS

The signatories to this memorandum agree that the decision to use *in-situ* burning lies with either the OSC or the OSC and the SOSC, based on the location of the burn as detailed in **Scope**. The SOSC is responsible for any additional concurrence/consultation requirements that apply at the state level. The decision to use *in-situ* burning should be made with guidance from the Region I *In-situ* Burning Policy (Information Section) and applicable Area Contingency Plans and is subject to the following conditions:

1. The OSC may authorize the use of *in-situ* burning on a discharge of oil to prevent or substantially reduce the hazard to human life without obtaining concurrence from EPA, DOI, DOC/NOAA, or the affected states, without following protocols established in this memorandum, and without following the guidelines in the Regional Contingency Plan and Area Contingency Plan. If *in-situ* burning is used in this manner, notification of EPA, USCG, DOC/NOAA, DOI and the affected state(s) via Regional Response Team representatives shall be made as soon as practicable. Once the risk to human life has subsided, this exception no longer applies.
2. The decision to use *in-situ* burning shall rest solely with the pre-designated OSC or jointly with the SOSC in certain zones as described under the **Scope** of this memorandum. This responsibility of the OSC may not be delegated.
3. If a decision has been made to use *in-situ* burning under the provisions of this memorandum, the OSC will immediately notify EPA, DOI, DOC/NOAA and the applicable state(s) of that decision via Regional Response Team representatives. This initial notification should include, but is not limited to, the following information to the extent available:
  - Type and amount of oil discharged
  - Area affected
  - The projected area of impact of the oil if not burned
  - Reasons why *in-situ* burning has been selected as a mitigation technique
  - On-scene weather
4. *In-situ* burning will be conducted by trained professionals using recognized techniques and technology. Burning will be conducted in a way that allows for safe and effective control of the burn to the maximum extent



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feasible, including the ability to stop the burn if necessary. Containment and control using fire-resistant boom is recognized as the preferred method of *in-situ* burning in open-water situations. In this situation, all practical efforts to limit the potential for igniting the source or adjacent, un-contained, or uncontrollable slicks will be made.

5. *In-situ* burning is advised only when the meteorological and sea conditions are operationally favorable for a successful burn. The OSC will give due consideration to the direction of the wind and the possibility of the wind blowing the smoke plume over population centers or sensitive resources onshore.

6. Health and Safety Concerns

(a) OPERATORS: Worker health and safety is of paramount concern. Each employer and OSC must comply with all applicable Occupational Health and Safety Administration regulations. Prior to any *in-situ* burn operations, a site safety plan must be prepared.

(b) GENERAL PUBLIC: Burning should be stopped if it becomes an unacceptable health risk to the general public. If at any time during burning operations exposure limits are observed to exceed National Ambient Air Quality Standards in nearby populated areas as a result of the burn, the OSC shall modify or suspend the burn operation as appropriate. Additionally, the OSC and the Unified Command should consider the potential effects of short term exposure of the public to high levels of particulates which may still meet National Ambient Air Quality Standards. Specifically, the OSC should consider the current short term *in-situ* burning exposure guideline recommended by the National Response Team (at the time of signature, the NRT guideline for short term particulate exposure from *in-situ* burning is 150  $\mu\text{g}/\text{m}^3$  of particulates less than 10  $\mu\text{m}$  diameter (PM-10) averaged over one hour; the current National Ambient Air Quality Standard for particulates is the same concentration averaged over 24 hours. The NRT guideline will be revised when more stringent particulate standards are adopted). OSCs in Region I shall factor this guideline on public exposure to *in-situ* burn emissions into burn initiation and continuation decisions. Public notification is advisable prior to initiating a burn.

7. The OSC shall ensure *in-situ* burning is conducted in accordance with any biological opinions rendered under Section 7 of the Endangered Species Act. Seasonal, spatial, or other similar restrictions identified in biological opinions shall be listed as Special Consideration Areas and placed in Appendix I. If threatened or endangered



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species are present in the immediate burn area, the trustee agency for that species must be consulted prior to initiating burning operations.

8. The OSC will make every reasonable effort to continuously evaluate the decision to burn, and allow Regional Response Team agencies and affected states the opportunity for comment. The OSC shall provide a mechanism to receive information from authorized representatives of the following entities that may necessitate termination of an *in-situ* burn: EPA, affected states, natural resource trustee agencies, and cognizant health agencies. Any verbal recommendations to terminate an *in-situ* burn must be followed up immediately in writing.

9. Representatives of the OSC shall monitor *in-situ* burning operations. The trustee agencies, the affected states, the Occupational Safety and Health Administration, and the responsible party may monitor *in-situ* burning operations, when feasible.

(a) Monitoring to establish “continue / modify / discontinue” information for input to the OSC shall accompany a burn. Visual monitoring may be sufficient provided the smoke plume is not predicted to affect human populations or highly sensitive areas. If smoke plumes are predicted to or may cross over populated areas, real-time PM-10 monitoring (a protocol is identified in Regional Response Team I *In-situ* Burning Policy — Information Section) is advisable and, when practicable, should be in place prior to the start of burn operations to gather baseline data.

(b) All burns must incorporate observations (typically visual) to monitor smoke plume behavior. A trial burn may be conducted to better estimate plume behavior prior to operational burning. Conditions under which the burn should be stopped, such as a threat of plume contact with the ground in populated or environmentally sensitive areas, shall be clearly identified to the maximum extent practicable to those conducting burn operations prior to starting the burn.

12. Mechanical recovery equipment shall be mobilized on-scene when feasible for backup and complimentary response capability. Provisions should be made for collection of burn residue following the burn(s).

13. If *in-situ* burning is used, a post incident debriefing will take place within 45 days to gather information concerning its effectiveness and to determine whether any changes to this memorandum are necessary. The debriefing will be chaired by the OSC, who will also arrange the time, place, and date of the debrief.



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**AMENDMENTS**

This Memorandum of Understanding may be amended in writing in whole or in part as is mutually agreeable to all signatories.

Special Consideration Areas submitted to the Regional Response Team as outlined in paragraph 4 of the **Scope** of this memorandum will be promptly distributed to signatories and included in Appendix I.

**CANCELLATION**

Each signatory to this Memorandum of Understanding may withdraw their agreement to the memorandum in whole or in part by submitting a letter of withdrawal to the Regional Response Team co-chairs; withdrawal from this memorandum will take effect no earlier than 30 days after receipt of this letter. The Regional Response Team co-chairs shall promptly notify other document signatories. Withdrawal by signatories shall not have any effect on this agreement with respect to remaining signatories.



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**SIGNATURES**

/s/

May 19, 1998

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Captain Thomas M. Daley  
First Coast Guard District (m)  
Acting Regional Response Team Co-Chair

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Date

/s/

May 19, 1998

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Ms. Dennisses Valdés  
US EPA Region I  
Regional Response Team Co-Chair

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Date

/s/

May 19, 1998

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Commander Burton Russell, USCG  
Captain of the Port Portland  
Federal On-Scene Coordinator

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Date

/s/

May 20, 1998

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Captain John Grenier, USCG  
Captain of the Port Boston  
Federal On-Scene Coordinator

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Date

/s/

May 19, 1998

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Captain Peter A. Popko, USCG  
Captain of the Port Providence  
Federal On-Scene Coordinator

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Date



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/s/

Jan 26, 1999

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Mr. Andrew Raddant  
Regional Environmental Officer / Northeast  
U.S. Department of Interior  
Regional Response Team Representative

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Date

/s/

May 19, 1998

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Commander Gerald Wheaton  
NOAA/Hazmat  
U.S. Department of Commerce  
Regional Response Team Representative

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Date

/s/

May 19, 1998

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Mr. David C. Sait  
State of Maine  
State Oil Spill Coordinator

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Date

/s/

Oct 6, 1998

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Ms. Trudy Coxé  
Commonwealth of Massachusetts  
Secretary of Environmental Affairs

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Date

/s/

Jan 25, 1999

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Mr. Robert W. Varney  
State of New Hampshire  
Commissioner, Department of Environmental Services

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Date

/s/

July 9, 1998



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Mr. Andrew H. McLeod  
State of Rhode Island and Providence Plantations  
Director, Department of Environmental Management

Date

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Ms. Barbara Ripley  
State of Vermont  
Secretary, Agency of Natural Resources

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Date

\*\* : Pending as of 1/26/99. If approval will be protracted, VT will send a letter to co-chairs stating that they have no objection to use of MOU in areas that do not affect Vermont.



**Appendix I: Special Consideration Areas**

**State of Maine Special Consideration Area**

**Year-round**

The OSC shall gain concurrence of the Maine State On-Scene Coordinator for *in-situ* burns within 12 miles of the Maine coast.

**20 foot water depth Special Consideration Area**

**Year-round**

The OSC must consult with DOI and NOAA Regional Response Team representatives when using *in-situ* burning in waters where the depth is less than 20 feet at mean low water. (Such consultation is already required in Zone C, which is inside 1 mile, so this only applies to any areas that may be less than 20 feet deep that are beyond 1 mile from shore.)

**National Marine Fisheries Service Special Consideration Area Summary**

Details of boundaries and conditions detailed in NMFS Northeast Section 7 consultation letter to First Coast Guard District dated November 18, 1997.

Case-by-case consultation with NMFS Northeast Region required for *in-situ* burning in:

*Jeffreys Ledge*

*April 1—September 30*

*Great South Channel*

*April 1—June 30, October 1—November 15*

*Cape Cod Bay*

*February 1—May 15*

**National Ocean Service Special Consideration Area**

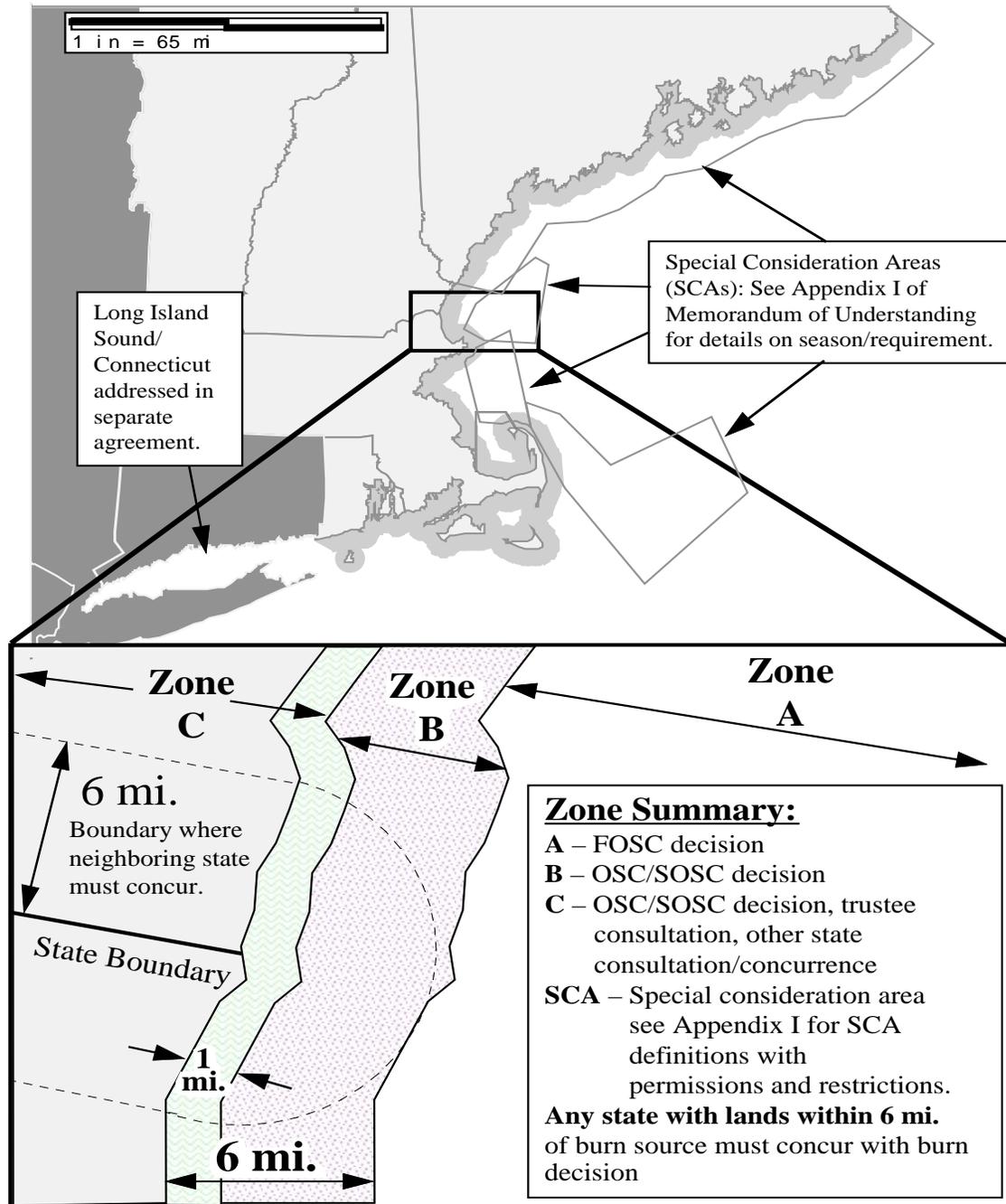
Case-by-case consultation with sanctuary manager required for *in-situ* burning in:

*Stellwagen Bank National Marine Sanctuary*

*Year-round*



**Appendix II: Zone Boundary Map and Diagram**





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***In Situ Burn Unified Command Checklist***

A checklist for use prior to conducting an in-situ burn during a response is appended herein:

**Purpose: *In-Situ Burn Unified Command Decision Verification Checklist***

The following checklist, created with input from the Region I RRT, provides a summary of important information to be considered by the Unified Command (consisting of the Federal On-Scene Coordinator (OSC), State On-Scene Coordinator (SOSC), and responsible party representative (RP)) when planning for the use of *in-situ* burning to respond to an oil spill in Region I that requires federal assistance. This checklist is intended to serve as Unified Command’s verification and documentation of an *in-situ* burning decision, rather than as an information distribution sheet or an approval form.

Each section of the checklist provides a series of “limiting factors” questions for each of the decision points on the Region I *In-Situ* Burning Decision Flowchart. Some sections also contain a “worksheet” for important information that may be necessary to answer limiting factor questions; the user is encouraged to attach forms that contain this information, if available. The final section of the plan should be completed (in addition to the rest of the checklist) only for burns at the shoreline, in marshes, or on land.

Questions in the limiting factors section that are answered with a “Yes/Optimal” support the decision to conduct an *in-situ* burn. However, spill response involves numerous tradeoffs, and any less-than-ideal conditions that are represented by a “No/Sub-Optimal” answer may be balanced by other benefits of *in-situ* burning in a given situation. Not every question of the worksheet must be answered. It is acceptable for the Unified Command to make a decision based on incomplete information, provided the information gaps are understood and considered.



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**In-situ Burn Decision:**

<b>Federal On-Scene Coordinator Decision:</b>	<input type="checkbox"/> Approve	Signature: _____
<b>State On-Scene Coordinator Decision:</b>	<input type="checkbox"/> Concur	Signature: _____
<b>Responsible Party Decision:</b>	<input type="checkbox"/> Concur	Signature: _____
<b>Fire Official Decision: *</b>	<input type="checkbox"/> Concur	Signature: _____

\* In Zone C and where elsewhere applicable. Under Region I MOU, additional consultation or concurrence is required in Zone C and in SCAs. Note additional concurrence/consultation per state matrices and SCAs.

Agency/Contact	Concurrence/consultation	Time/Date	Method (verbal, written)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Recommendation by checklist preparers:**

Points of Contact for checklist	Name	Position	Telephone
Federal			
State			
Responsible Party			
Scientific Team			
Other:			
Other:			



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**Common Section (All Burns)**

**Incident Information**

Incident Name	
Current date/time	
Anticipated burn date/time	
Location of spill (descriptive)	
Location of burn (descriptive)	

**Spill Location / Trajectory**

*Resource for section: Scientific Support Team*

Trajectory (Graphic Attached)	Yes	No
-or- Text:		
Overflight Map (Graphic Attached)	Yes	No
-or- Text:		

*Resource for section: Requesting Party*

	Optimal Condition	Sub-Optimal Condition	Comments
<b>Oil Burnability</b>	Yes or Probable	No or Unlikely	
Anticipate oil to remain ignitable (fresh, not highly emulsified)?			
Attachments/Additional Information:			



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	Optimal Condition	Sub-Optimal Condition	
<b>Operational feasibility</b>	Yes or Probable	No or Unlikely	Comments
Is an operational plan written or in process? (if available, attach)			
Is needed air support available?			
Are personnel properly trained, equipped with safety gear, and covered by a site safety plan?			
Are all necessary communications possible (i.e. between aircraft, vessels, and control base in an open water burn)?			
Can all necessary equipment be mobilized during window of opportunity?			
If present, are ice and debris factored into plan?			
Can undesirable secondary fires be avoided?			
Can burn be safely extinguished or controlled?			
Can aircraft pilots/mariners be adequately notified, as necessary?			
Is equipment and personnel available for residue recovery?			
If ignition from a helicopter, FAA approved equipment?			
Attachments/Additional Information:			

**Operational worksheet:**

Product Type: \_\_\_\_\_

Easily emulsified? \_\_\_\_\_

Volume to be burned: \_\_\_\_\_

Volume of product released: \_\_\_\_\_

Estimated Burn Duration \_\_\_\_\_

Burn method (at source, containment and towing to safe distance, onshore ignition): \_\_\_\_\_



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*Resource for section: OSC/SOSC staff in consultation with meteorologists/modelers as appropriate*

	Optimal Condition	Sub-Optimal Condition	
<b>Human and Environmental Impacts</b>	Yes or Probable	No or Unlikely	Comments
Public exposure to PM-10 (particulates <10µm) not expected to exceed 150 µg/m <sup>3</sup> averaged over 1 hour as a result of burn? (current NRT planning guideline)			
Can burning be conducted at a safe distance from other response operations, and public, recreational, and commercial activities?			
Is particulate (hour-averaged PM-10) monitoring available if plume may cross over populated areas?			
Can public be adequately notified of burn?			
Is burn outside of identified Special Consideration Areas? (if no, additional restriction or permission exists inside area)			
Trustees consulted if endangered species in immediate burn area?			
Attachments/Additional Information:			

**Public Health/Plume Worksheet:**

Distance/direction to nearest population relative to burn: \_\_\_\_\_ miles to the \_\_\_\_\_ (direction)

Distance/direction to nearest downwind population): \_\_\_\_\_ miles to the \_\_\_\_\_ (direction)

Forecast wind direction / speed (24 hour): \_\_\_\_\_ mph from the \_\_\_\_\_ (direction)

Forecast wind direction / speed (48 hour): \_\_\_\_\_ mph from the \_\_\_\_\_ (direction)

Estimated plume trajectory (text or attached graphic):

Visibility comments and forecast:

Other comments / issues:



**Maine Marine Oil Spill Contingency Plan Appendix VI: In Situ Burning**  
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*Resource for section : OSC Representative*

<b>Decision to Initiate ISB (Consultations) Concurrence</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Have MOU Zones been reviewed and zone of burn location determined (A, B, C, Special Consideration Area)?			
Are consultations / concurrence called for by zone complete or in process: (Zone A=OSC, B=OSC/SOSC. C=OSC/SOSC/Trustee consultation and others required by state (i.e. fire official), Special Consideration Areas-specific requirements			
Has SOSC received concurrence from or consulted / notified any additional agencies, if required by the state for in situ-burning?			
Have adjacent state(s) SOSC(s) concurred (land within 6 miles of burn) or been consulted (no land within 6 miles, but interested in decision)?			
If applicable, are other boundary concerns pre-planned / resolved by consultation / concurrence (Canadian, Region II, tribal)?			
Is oil to be lit only with ignition source (e.g. helotorch) without the use of a burning agent to improve combustibility of oil?			
<i>Only if no:</i> Concurrence of State RRT Representative? Concurrence of EPA RRT Representative? Consultation with natural resource trustees?	___ ___ ___	___ ___ ___	
Notifications planned as described in MOU (EPA, DOI, NOAA, State(s))?			
Attachments / Additional Information:			



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**Inshore Burn Section (Complete this section only for inshore burns):**

*Resource for section: Scientific Support Team*

	Optimal Condition	Sub-Optimal Condition	
<b>Environmental Impacts</b>	Yes or Probable	No or Unlikely	Comments
Does season or water/ice level minimize damage to oiled area (i.e. dormant plants and/or flooded root systems)?			
Does information in worksheet below and additional information available indicate that proposed inshore burn will result in net environmental benefits when compared to other alternative response countermeasures or no action?			

*Resource for section: SOSOC representative*

	Yes	No	Comments
<b>Decision to Initiate ISB (Consultations/Concurrence)</b>			
Does fire official concur with decision to burn (per state requirements)			
Local Air Quality Personnel consulted/concur on decision to burn? (Consult SOSOC for particular state requirements)			
Landowner consulted on decision to burn?			

**In-shore Environmental Worksheet:**

Oil Thickness:

Habitat/Substrate Type (e.g. salt marsh) and dominant Plant Species:

Description and size of Area to be Burned (include location of proposed burn with respect to spill source, an attached sketch, survey or picture of area is helpful):



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Environmental Concerns and Recommendations, (include environmental trade-offs, water depth, past management practices, weather factors, presence of wildlife, alternate or additional clean-up methods:

Environmental Review Personnel (names and numbers):

Description of Operations (include how the fire will be contained, controlled and ignited):

Method to Recover Burn Residue, if expected:

Monitoring to be Performed: