

U. S. Coast Guard Sector



Auxiliary Assistant Pollution Investigator

Performance Qualification Standard

Revision Date: 05 August 2015

Sector Training Guide

Auxiliary Assistant Pollution Investigator Performance Qualification Standard

Qualification Code: AUX-ED

This booklet is one section of your personal on the job training (OJT) manual. It is your OJT guide to qualification as an Auxiliary Assistant Pollution Investigator. It is your responsibility to document completed unit training items.

Verifying Officers shall be experienced and qualified personnel who have demonstrated the ability to evaluate, instruct, and observe other personnel in the performance task criteria. Verifying Officers must be certified in the competencies for which they are to verify and must be command designated. Verifying Officers must enter their title, name, and initials in the Record of Verifying Officers section before making entries in your workbook.

A Verifying Officer shall observe your successful performance of each task and document such with date and initials in the appropriate space provided in this booklet. It may be necessary to perform a task several times. The Verifying Officer will not give credit for any task that is not performed satisfactorily.

Auxiliarists do not have law enforcement authority. They cannot independently exercise COTP, OCMI, FMSC or FOSC authority and may become personally liable for actions they take outside of prescribed directives. Do not allow an Auxiliarist to be placed in a position that will compromise the limitations on the member's authority.

Certain tasks may require participation in an actual incident response, but the unit's response activity may preclude you from accomplishing these tasks. Therefore, with the approval of the Command and Verifying Officer, you may utilize exercises and/or training as a means of accomplishing the requisite participation in order to fulfill the task requirements.

When you have completed all of the items required for this qualification, your COTP will issue a Letter of Designation. You must forward a copy of your Letter of Designation to your DIRAUX for entry into AUXDATA. Should any item be waived the qualification is considered local and will not be entered into AUXDATA and may not be used toward qualification for the Trident device.

RECORD OF VERIFYING OFFICERS				
Title	Verifying Officer's Name	Initials		

RECORD OF MAJOR TASKS COMPLETED			
Task Number	Major Tasks	Date Completed	
1.0	Legal Basis for Pollution Response		
2.0	Phase I: Discovery of Notification		
3.0	Phase II: Preliminary Assessment and Initiation of Action		
4.0	Phase III: Containment, Countermeasures, Cleanup, and Disposal		
5.0	Phase IV: Documentation and Enforcement Actions		

RECORD OF COMPLETION			
Training Prerequisites	Date	Training Coordinator's Signature	
A. Completion of resident training course:			
1. Pollution Incident Response (Recommended)			
B. Completion of correspondence courses:			
 Introduction to Marine Safety and Environmental Protection (IMSEP) ICS 100 			
3. ICS 200			
4. ICS 300			
5. IS 700			
6. IS 800			
C. Completion of HAZWOPER First Responder Operations (FRO) Level training.			
D. Favorable DO PSI if required by COTP/OCMI			
E. Completion of PQS Workbook.			
F. Successful completion of unit level oral board.			
G. Designation Letter submitted for approval.			

All qualification requirements have been satisfactory completed by _____

References

The following references will aid you in completing the majority of tasking in this PQS.

- "Response to Marine Oil Spills," International Tanker Owners Pollution Federation
- "The World Catalog of Oil Spill Response Products"
- "Training Reference for Oil Spill Response," DOT/EPA/DOI.
- American Conference of Governmental Industrial Hygienists (ACGIH), Threshold Limit Values and Biological Exposure Indices
- American Conference of Governmental Industrial Hygienists (ACGIH), Threshold Limit Values for Chemical Substances, 7th Edition
- Department of Transportation (DOT) "Emergency Response Guidebook" <u>http://hazmat.dot.gov/pubs/erg/gydebook.htm</u>
- Environmental Protection Agency's (EPA) Website: <u>http://www.epa.gov</u>
- International Convention for the Safety of Life at Sea (SOLAS) 1974, as amended
- Local unit's Area Contingency Plan (ACP)
- National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards
- National Oceanic and Atmospheric Administration (NOAA):
 - "Shoreline Countermeasures Manual"
 - "Shoreline Assessment Manual"
 - o "Mechanical Protection Guidelines"
- Response to Marine Oil Spills," International Tanker Owners Pollution Federation.
- Spill Tactics for Alaska Responders (<u>www.dec.state.ak.us/spar/perp/star/index.htm</u>)
- The International Convention for Pollution from Ships, 1973, as modified by the Protocol of 1978 (MARPOL 73/78)
- Title 29 Code of Federal Regulations, Part 1910.120
- Title 33 Code of Federal Regulations, Parts 1, 2, 6, 88, 104-105, 126-127, 130, 135, 153-156, and 160
- Title 40 Code of Federal Regulations, Parts 116, 117, 261, and 300
- Title 46 Code of Federal Regulations, Part s 4 and 16
- Title 49 Code of Federal Regulations, Parts 172
- Title 5 U. S. Code § 552, Freedom of Information Act
- Title 5 U. S. Code § 552A, Privacy Act
- Title 33 U. S. Code § 407, Refuse Act
- Title 33 U. S. Code § 1251-1387, Federal Water Pollution Control Act (FWPCA), as amended
- Title 33 U. S. Code § 2701-2761, Oil Pollution Act of 1990
- Title 42 U. S. Code § 1801-1812, Resource Conservation and Recovery Act (RCRA) of 1976
- Title 42 U. S. Code § 9601-9675, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended
- Title 46 U. S. Code § 701, Maritime Transportation Security Act
- Title 46 U. S. Code § 6100 and 7704, Shipping

- U. S. Coast Guard CERCLA Response Authority, COMDTINST 16465.29 (series)
- U. S. Coast Guard Chemical Hazards Response Information System (CHRIS), COMDTINST M16465.12C (series)
- U. S. Coast Guard Civil Penalty Hearing Officer Procedures, COMDTINST 16200.5 (series)
- U. S. Coast Guard Civil Penalty Procedures and Administration, COMDTINST 16200.3 (series)
- U. S. Coast Guard Confined Space Entry, COMDTINST 5100.48A (series)
- U. S. Coast Guard Criminal Enforcement of Environmental Laws, COMDTINST M16201.1 (series)
- U. S. Coast Guard Critical Incident Communications, COMDTINST 3100.8A (series)
- U. S. Coast Guard Freedom of Information and Privacy Acts Manual, COMDTINST M5260.3 (series)
- U. S. Coast Guard Guidance and Procedures for Administering and Enforcing the Oily Waste Reception Facility Program, COMDTINST M16450.27 (series)
- U. S. Coast Guard Incident Command System, COMDTINST 3120.14 (series)
- U. S. Coast Guard Incident Management Handbook, COMDTPUB P3120.17A (series)
- U. S. Coast Guard Legal Authorities, COMDTPUB 5850.2 (series)
- U. S. Coast Guard Marine Safety Laboratory Sample Handling and Transmittal Guide, <u>http://www.rdc.uscg.gov/msl/Documents/tabid/221/Default.aspx</u>
- U. S. Coast Guard Marine Safety Manuals, COMDTINST M16000 (series)
- U. S. Coast Guard Notice of Violation User's Guide, COMDTINST 5582.1 (series)
- U. S. Coast Guard Office of Vessel Activities (CG-3PCV) Policy Letter 06-01: Guidance for the Enforcement of MARPOL Annex I During Port State Control Examinations
- U. S. Coast Guard Oil Pollution Response Planning Guide for Extreme Weather, COMDINST 16466.2 (series)
- U. S. Coast Guard Public Affairs Manual, COMDTINST 5728.2 (series)
- U. S. Coast Guard Special Teams Handbook: <u>http://www.uscg.mil/hq/g-</u> m/HAZMAT%20Response%20Special%20Teams%20Handbook.pdf
- U. S. Coast Guard Vessel Response Plans and Shipboard Oil Pollution Emergency Plans info: <u>http://www.uscg.mil/vrp/default.htm</u>
- U. S. Geological Survey's Website for definitions of PAH: <u>Http://toxics.usgs.gov/definitions/pah.html</u>

<u>Task</u> <u>Number</u>	<u>AUX-ED</u> <u>Task</u>	<u>Date</u> <u>Completed</u>	<u>Verifying</u> Officer's Initials
1.0	Legal Basis for Pollution Response		
1.1	List the laws applicable to conducting pollution (i.e. oil and hazardous substance) investigations.		
1.2	 State and define the applicability, jurisdiction, and intent: Federal Water Pollution Control Act of 1972 (FWPCA) Clean Water Act (CWA) Oil Pollution Act of 1990 (OPA 90) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or SuperFund) Refuse Act Privacy Act Resource and Conservation Recovery Act (RCRA) 		
1.3	Define "harmful quantity" and "reportable quantity" as they apply to oil and hazardous materials under the FWPCA and CERCLA.		
1.4	State what parties may be considered "responsible parties" under FWPCA and CERCLA.Define a responsible party.		
1.5	Define "Navigable Waterway" as the term applies to the FWPCA.		
1.6	 Describe the occasions and policies for entry onto private property. Secured (locked gate) Unsecured (open gate) 		
1.7	 Describe a Captain of the Port Order with regards to the following: Authority Regulation Circumstances to use the COTP (i.e. When can an order be issued?) 		

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1.8	 Describe the purpose and use of a Letter of Undertaking (LOU), including: When to use the LOU Form of surety required Applicable authority for issuance 		
1.9	 Describe the purpose and use of an Administrative Order including: Authority Circumstances to use this order 		
1.10	 Describe a transfer suspension order including: Authority Circumstances to use this order 		
1.11	Describe the purpose, use, and meaning of a Notice of Federal Interest:Explain the meaning of limits of liability.		
1.12	 List the factors for determining the size of a spill (include inland and coastal) for the following: Minor Medium Major 		
1.13	 Describe the applicability and purpose of the following pollution prevention regulations: 33 CFR Part 154 (Facilities) 33 CFR Part 155 (Vessels) 33 CFR Part 156 (Transfer Operations) 		
1.14	Explain the purpose and applicability of a Certificate of Financial Responsibility (COFR).		
1.15	Explain the legal authority:Notice of Violation.Report of Violation		
1.16	Describe the applicability, scope, and purpose of MARPOL regulations.		

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2.0	Phase I: Discovery or Notification		
2.1	Describe the types of pollution incidents requiring reports and identify the applicable laws/regulations.		
2.2	Describe what the RP and/or witness must report for the incidents identified in Task 2.1 and how they may be reported.		
2.3	 List possible sources of pollution reports and means of reporting, including: National Response Center Sector Command Center Telephone Walk-ins Report of a Marine Casualty (CG-2692) 		
2.4	State the information to be gathered during an initial report of the discovery of an oil spill or hazardous substance release.		
2.5	Assist in Linking a NRC report to generate a MISLE Notification.		
2.6	 Receive and explain the MISLE notification process of pollution report. Demonstrate MISLE notification entry (use referential parties). Review involved party's history. Review involved vessel's history. Review involved facility's history. 		
2.7	List the possible courses of action upon receipt of an initial report of pollution.		
2.8	Define a reportable and non-reportable marine casualty.		
2.9	Assist with Taking two initial reports of pollution incidents and with choosing the proper courses of action (Ente r each activity in the log at the back of		

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2.10	this PQS.) Summarize the Commandant's Public Affairs Policy.		
3.0	Phase II: Preliminary Assessment and Initiation of Action		
3.1	 Describe the importance of the following factors for the initial response actions: Health and safety concerns Suspected substance type and characteristics Physical location Weather conditions Weathering effects of pollutant Credibility of reporting source (RP or 3rd party; validate reporting source by contacting other agencies near the spill) 		
3.2	Develop a response strategy for a medium or major pollution incident.		
3.3	Forecast the trajectory of a floating pollutant in your AOR using current technology.		
3.4	 Obtain on-scene data, both current and forecast (for your AOR) including: Wind conditions Tides and Currents Temperature 		
3.5	Assist in Communicating with the media regarding a pollution incident.		
3.6	Describe Coast Guard responsibility and authority concerning public safety and responder safety during a pollution incident.		
3.7	Describe the safety training requirements (i.e. HAZWOPER) for persons responding to oil and hazardous materials incidents.		

<u>Task</u> Number	<u>AUX-ED</u> <u>Task</u>	<u>Date</u> Completed	<u>Verifying</u> <u>Officer's Initials</u>
3.8	Identify the most common oil and hazardous materials transported in your zone and their associated safety hazards.		
3.9	 Define confined spaces. Describe the hazards associated with confined spaces. Define Coast Guard policy concerning confined space entry. 		
3.10	Describe the safe work practices and other measures needed to provide an acceptable level of safety during pollution investigation and response activities, including any Commandant and unit instructions.		
3.11	 Assist in Conducting preliminary investigation including the following: Identify reporting exclusions and data entry exceptions. Determine jurisdiction and authority. Define a marine casualty and the relationship to a pollution spill. Determine casualty type (i.e. reportable/non-reportable). Determine product classification, grade, and category. Review Responsible Party history. Outstanding deficiencies? Determine appropriate actions based on spill classification from Task 1.12 (i.e. minor, medium, or major). Identify pollution elements (i.e. list all five). Determine substance (i.e. CERCLA) Harmful quantity? Reportable quantity? 		
3.12	Define a serious marine incident.		

<u>Task</u> Number	<u>AUX-ED</u> Task	<u>Date</u> Completed	<u>Verifying</u> <u>Officer's Initials</u>
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3.13	Identify and explain the differences for the following terms:		
	Hazardous Waste		
	Hazardous Substance		
	Hazardous Material		
	• Oil		
	Release and discharge		
3.14	Identify Lead Investigative State/Substantially Interested State(s).		
3.15	Explain all levels of investigative effort including:		
0110	 Data collection 		
	• Informal		
	• Formal		
	Marine Board		
3.16	Assist in Gathering and reviewing information for		
	the following:		
	• Evaluate site safety and risk assessment.		
	• Determine responsible party, involved parties, and parties in interest.		
	 Explain when you would consult with other 		
	CG personnel such as Inspectors, Investigators,		
	District legal, and/or other subject matter		
	experts.		
	• List examples for acquiring consultation, (i.e.		
	sinking of an inspected vessel, gross		
	negligence of a Tankerman during an oil		
	transfer operation, and leaking of fuel oil from		
	a crack in the side of a commercial ship's hull plating).		
3.17	Identify the minimum Personal Protective Equipment		
	required for personnel responding to oils/hazardous substances handled in your AOR.		
3.18	Assist in Validating the pollution report and briefing		
	Command; including the following:Provide recommended course of action.		
	 Provide recommended course of action. Provide spill size and source (if known). 		
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<u>Number</u>	<u>Task</u>	<u>Completed</u>	Officer's Initials

- 3.19 **Define** the following characteristics which may be considered prior to and during a spill response:
 - Hazard Class
 - Reactivity
 - Physical State
 - Specific Gravity
 - Vapor Density
 - Paths (or Routes) of Entry
 - Threshold Limit Values (TLV)/Recommended Exposure Limits (REL)/Permissible Exposure Limits (PEL)
 - Short Term Exposure Limits (STEL)
 - Immediately Dangerous to Life and Health Concentrations (IDLH)
 - Lethal Concentration 50% (LCD50)/Lethal Dose 50% (LD50)
 - Bioaccumulation
 - Bio-oxygen Demand
 - Lower Explosive Limit (LEL)/Upper Explosive Limit (UEL) and Lower Flammable Limit(LFL)/Upper Flammable Limit (UFL)
 - Flash Point
 - Vapor Pressure
 - Boiling Point
- 3.20 **Identify** potential sources and the hazards associated with the following:
 - Benzene
 - Carbon dioxide
 - Hydrogen disulfide (H2S)
 - Polycyclic aromatic hydrocarbon (PAH)
 - Lack of oxygen

Phase III: Containment,4.0 Countermeasures, Cleanup, and Disposal.

4.1 **Assist in Issuing** a Notice of Federal Interest.

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4.2	 Identify Evidence Types including the following: Demonstrate evidence process procedures State the difference between handling and processing civil and criminal evidence. Make proper notifications for criminal case (i.e. CGIS and IOs). Collect witness statements. Review physical evidence. Review photographs and/or video. Review diagrams and charts. Review vessel and/or facility logs Evaluate written operating procedures for vessels or facilities 		
4.3	Explain the terms "direct evidence" and "circumstantial evidence".		
4.4	Demonstrate the procedures necessary to take valid samples of oil for an analysis (both sheen and heavy concentration).		
4.5	List the types of samples necessary to provide the Marine Safety Laboratory with sufficient physical evidence to perform 'fingerprint' identification.		
4.6	Describe the procedures for maintaining the chain of custody and properly forwarding samples to the Marine Safety Laboratory.		
4.7	Describe the procedures for proper storage of oil samples.		
4.8	Describe the proper shipping method of oil samples to the Marine Safety Laboratory.		
4.9	 Illustrate and state the advantages and disadvantages of the following physical containment methods: Physical barriers (non-boom) Diking/berming 		

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4.9 (Cont.)	TrenchingOverflow and underflow dams		
4.10	 Identify and explain the mode of operation of the following common skimmer types: Weir Suction Submersion Vortex/Centrifugal 		
4.11	Identify the support items necessary to conduct skimming operations.Open waterRiver		
4.12	Identify the skimmer types and sources that are available in your AOR.		
4.13	 Explain the effects the following factors will have on skimmer performance: Sea state Water depth Debris Oil thickness Oil viscosity 		
4.14	Define adsorbent and absorbent and explain the difference between the two terms.		
4.15	 Define and identify the following sorbent types: Organic Inorganic synthetic 		
4.16	 Identify common dimensions and appropriate uses for the following forms of sorbents: Pad, roll, and blanket Sock, pillow and sweep Snare/pom-pom Particulate 		

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4.17	 Assist with Interviewing witnesses and Parties of Interest including the following: Explain the warnings and notices of rights given to witnesses. List the elements that comprise an acceptable witness statement. 		
4.18	 Demonstrate analytical ability for assessing the cause of spill and recommendations for future actions: Explain who secures source and why. Explain cause of spill. Identify causal factor (i.e. human or mechanical error, lack of preventive maintenance). 		
4.19	Explain why CG personnel shall not operate non-CG owned equipment (i.e. vessel's or facility's shut-off valves, hose nozzle, etc.).		
4.20	Explain the contents of a Site Safety Plan.		
4.21	Explain the applicability of a Site Safety Plan during a spill.		
4.22	Conduct a shoreline cleanup assessment.		
4.23	Complete the Blue Book (CG-3639A).		
4.24	Complete an ICS Form 201 (Incident Briefing Form).		
5.0	Phase IV: Documentation and Enforcement Actions		
5.1	Participate in a 201 briefing to the Command.		
5.2	 Assist with Documenting a Report of Investigation in MISLE: Analyze the findings of fact. Present analysis. Formulate conclusion. 		

<u>Task</u>	<u>AUX-ED</u>	<u>Date</u>	<u>Verifying</u>
<u>Number</u>	<u>Task</u>	<u>Completed</u>	Officer's Initials
5.3	Identify enforcement actions and document in MISLE.		
5.4	 Describe the elements of the following: Civil Penalty violation under FWPCA and CERCLA Failure to notify violation Class II civil penalty Criminal violation Refuse Act violation MARPOL Notice of Violation (ticket) Report of Violation Human error (i.e. Tankerman forgets to gauge the tank barge's cargo tank causing the tank to overflow) 		
5.5	 Review two pollution activities and determine the course of action (i.e. demonstrate the review of RP's history in MISLE): Letter of Warning Notice of Violation Report of Violation Civil Penalty Criminal 		
5.6	Explain why you chose the course of action for Task 5.5.		
5.7	 Assist with Preparing the following: Letter of Warning Notice of Violation 		
5.8	Assist with Preparation and processing a Report of Violation (Class 1 Civil Penalty).		
5.9	Assist with Drafting safety recommendations and document in MISLE.		
5.10	Assist with Drafting safety alert and document in MISLE.		

Task	<u>AUX-ED</u>	Date	<u>Verifying</u>
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5.11	Assist with Drafting appropriate message traffic on CGMS for a pollution or hazardous substance incident.		
5.12	 Describe the purpose and use of a Letter of Undertaking: When is a LOU used? What form of surety would be required? Issuance authority? 		

INCIDENT LOG					
Date	Incident Description	Position Filled	MISLE Case Number	FPN/ CERCLA Number	Verifying Officer's Initials

NOTES

NOTES

SAMPLE LETTER OF DESIGNATION

U.S. Department of Homeland Security

United States Coast Guard



Command's Name

Street Address City, State Zip Code Staff Symbol: Phone: Email:

1601 DATE

MEMORANDUM

From:	I. M. Frank, CAPT Unit's Name	Reply to Attn of:	
To:	M. O. Ore, USCG Auxiliary		
Subj:	DESIGNATION AS AUXILIARY ASSISTANT POLLUTION INVESTIGATOR		
Ref:	Auxiliary Assistant Pollution Investigator Performance Qualification Standard Workbook		
1. Concentral tional You have completed all requirements recording to reaform the duties			

1. Congratulations! You have completed all requirements necessary to perform the duties of a Auxiliary Assistant Pollution Investigator. You are authorized to carry out the responsibilities of an Auxiliary Assistant Pollution Investigator within the scope of your qualifications. This is a significant milestone in your professional development and I commend your accomplishments.

2. This Letter of Designation should be retained as part of your personal Training Record and you will be assigned the Auxiliary Assistant Pollution Investigator's Qualification Code "AUX-ED".

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