

4320 Volunteer Coordination and Documentation

Due to the logistical requirements of coordinating volunteers, the response organization must be large enough to support volunteer participation. That is why the use of volunteers may not be appropriate during smaller incident responses. The assignments provided should be low risk. In certain circumstances, volunteers may be used for higher risk activities. A common use of volunteers for man-made or natural disasters include activities such as wildlife cleaning or removal of beach or shoreline debris. These activities, however, require specialized training and in some cases licensing.

The Sector Liaison Officer (LNO) will generally be the first to receive external reports of volunteer interest due to the outreach responsibilities of that position. If volunteer interest exists, the LNO should recommend the establishment of a Volunteer Coordinator (VC) who could be a member of the Coast Guard Auxiliary. The VC plays a critical role in the Unified Command's (UC) outreach to the public. The VC will normally become part of the Planning Section. The VC will work with the manager or supervisor of the volunteer organizations and the Joint Information Center when a UC is established. Once accepted by the UC, the volunteer organization will be assigned to a specific branch or unit based on incident needs. Representatives from the volunteer organizations will coordinate with the appropriate Branch within the Operations Section and are responsible for coordinating their member activities.

Some of the VC functions may include but are not limited to the following:

- Provide a point of contact for all volunteers as well as for all units/agencies needing volunteers.
- Work with the EOC Liaison to coordinate volunteer activities
- Establish a communication system, including toll-free phone numbers, fax lines and fax machines, phones, a website, and a link to the Command Center. Recruitment of an Amateur Radio Operator should be considered for remote locations.
- Create a credentialing system allowing designated volunteers access to the scene. This may come in the form of wrist bands, a letter from Federal On Scene Coordinator or a picture ID. Some responsible parties may have developed their own credentialing system. The system to be used will be developed on a case by case basis.
- Coordinate with the Public Information Officer (PIO) or Joint Information Center (JIC) to provide notification to the media regarding types of volunteer jobs available and procedures for volunteering, including a toll free phone number or website where more information is available and/or where volunteers can register. It is essential to coordinate dissemination of the toll-free telephone numbers to the public through the UC's JIC and local PIOs to reduce confusion and ensure consistency of information. When the VC is activated, the UC's JIC and local PIOs may want to issue a press release with information regarding volunteers.

It is the volunteer AGENCY supervisor's job to:

- Provide proper briefings to the VC
- Oversee operations as assigned
- Provide and ensure the proper use of PPE
- Ensure health and safety of volunteers
- Ensure that logistics requirements are met
- Maintain all required documentation
- Maintain volunteer credentialing
- Track volunteers

4321 Affiliated Volunteer Organization Resources and Capabilities

In many cases, the Responsible Party (RP) is responsible for the funding of the man made or natural disaster response. In this active role, it is critical that their concerns and limitations on using volunteer organizations are considered. Often RP's are hesitant to utilize volunteers due to liability and legal considerations. However, the advantages and disadvantages will be discussed and decided upon by the UC, with advice from legal representatives.

The potential use of Affiliated Volunteer Organizations (AVO) and unaffiliated volunteers must be discussed within the Area Committee to clarify how the decision to use volunteers will be made. This must be done during routine Area Committee meetings and revisited again during the onset of an incident. Federal On Scene Coordinator (FOSC) Representatives should drive this discussion. Often, when affiliated volunteers are used, the volunteers are covered under the affiliated organizations liability coverage. If a unilateral UC or Coast Guard decision is made to use affiliated or unaffiliated volunteers, the RP generally has no regulatory obligation to provide support or management resources.

The Oil Spill Liability Trust Fund (OSLTF) is available up to 50 million dollars annually for federal response costs under the Clean Water Act. The OSLTF may be used to pay for volunteer expenses consistent with this authority. FOSCs should communicate with the Coast Guard Commandant office of CG-533 and the National Pollution Funds Center when dealing with issues regarding funding for volunteers.

State volunteer coordinator POC information can be found at:

- **Volunteer Florida**
401 S. Monroe St.
Tallahassee, FL 32301-2034

- **Contact:** Wendy Spencer
Chief Executive Officer
Phone: 850-921-5172 Email: wendy@volunteerflorida.org
Fax: 850-921-5146 Website: <http://www.volunteerflorida.org>
- **Florida Citizen Corps**
<http://www.floridadisaster.org/CitizenCorps/Volunteer/Centers.htm>

County volunteer resource information can be found at the county EOC Emergency Support Function 15 (ESF-15). Listed below are links to the county EOC websites:

- Nassau County: <http://www.eoc-nassau.org/>
- Duval County:
<http://www.coj.net/Departments/Fire+and+Rescue/Emergency+Preparedness/default.htm>
or www.handsonjacksonville.org
- Clay County:
http://www.claycountygov.com/Departments/Public_Safety/Emergency_Management.htm
- St. Johns County: <http://www.sjcemergencymanagement.org/>
- Volusia County: <http://www.volusia.org/emergency/>
- Flagler County: <http://www.flagleremergency.com/>
- Brevard County: <http://embrevard.com/>

These resources are available for general disaster response, but some may be available for support during oil spill response operations. Additional volunteer resources may become available for specific events.

4322 Health and Safety Training Standards

Managers or supervisors of volunteers shall meet the state and Occupational Health and Safety Administration (OSHA) requirements for the area where they will be used and for the position which they will fill. The National Contingency Plan (40 CFR 300), Appendix E, paragraph 6.0, addresses the use of volunteers and OSHA pamphlet 3172 outlines the training required.

Elements of required and recommended training will vary depending on the tasks of the individuals involved in the response. Training requirements and specific courses vary with level of involvement, agency policy, UC requirements, OSHA and state regulations. Volunteers that do not possess the required training will not be permitted to participate in UC sanctioned response activities. Generally,

volunteers who respond to an oil spill incident will not be used in the physical removal of the hazardous substance. The acceptable level of training is outlined below:

- At a minimum, volunteers should provide documentation of IS100 and IS700 training before being assigned to duties within the UC. This training is provided free of charge at: <http://training.fema.gov/IS/crslist.asp>.

Although volunteers are not employees of the volunteer organizations, they will be considered workers and will be required to complete or possess required hazardous substances, safety, and health hazard training per 29 CFR 1910.120(e) if participating in hazardous waste operations (HAZWOPER). This regulation dictates that post-emergency response workers have 40 hours of HAZWOPER training. These 40 hours of training would be difficult and expensive to set up for volunteers. Instead, volunteers can fall under a “De Minimis” exception. Under OSHA Directive CPL 2-2.51 and OSHA Standards Interpretation and Compliance Letters (dated 02/13/1992), “a minimum of four hours [of training] would be appropriate in most situations.” The criteria for De Minimis are:

- The job site is in an area where a qualified person has decided that the exposure potential is expected to remain under Permissible Exposure Limits (PEL),
- Health risks from skin absorption are minimal,
- Workers have been trained on procedures in the event of an emergency and hazards associated with the hazardous substances in their workplace,
- Workers have completed training including topics such as decontamination procedures, heat stress, hypothermia, water safety, and operating procedures, and,
- Supervisors have received a minimum of 24 hours of training.

It is the intent of the UC to keep volunteers away from the hazardous substances: however, there may be a time when certain volunteers possess unique skill sets that warrant potential contact with the hazardous substance. The minimum training required for volunteers involved in removal operations should be consistent with the hazardous waste operations standards set forth in 29 CFR 1910.120(e) and (q). If select volunteers are deemed appropriate by the UC to further their services and wish to take a more direct role in spill response operations, they will have to meet the requirements listed below:

- **29 CFR 1910.120(e)(1)(i)** states that all employees working on site (such as but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training meeting the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. They shall receive review training as specified in this paragraph.
- **Management and supervisor training, 29 CFR 1910.120(e)(4):** On-site management and supervisors directly responsible for, or who supervise employees engaged in hazardous waste operations shall receive 40 hours initial training, three days of supervised field experience (the training may be reduced to 24 hours and one day if the only area of their responsibility is employees covered by paragraphs (e)(3)(ii) and (e)(3)(iii)), and at least eight additional hours of specialized training at the time of job assignment. Specialized training will include topics such as, but not limited to, the employer's safety and health

program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

- **General site workers, 29 CFR 1910.120(e)(3)(i):** General site workers require 40 hours of instruction off the site and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor. Volunteers should not be put in situations where they would be considered a general site worker
- **Occasional site workers, 29 CFR 1910.120(e)(3)(ii):** Occasional site workers require 24 hours of instruction off the site, and a minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. An example of this category worker is a field observer.

Some states have federally approved state plans outlining health, safety, and training requirements based on HAZWOPER standards. These states are called state-plan states. State plans and their volunteer safety training standards shall have precedence since these plans are approved by OSHA. If volunteer tasks do not require HAZWOPER training, such training should not be conducted or mandated. A list of state-plan states and POCs can be found at: <http://www.osha.gov/dcsp/osp/index.html>.

4323 Safe Use of Volunteers

The National Oil and Hazardous Pollution Contingency Plan (NCP) 40 CFR 300 discourages volunteer participation in physical removal activities and limits them to non-hazardous tasks due to the extensive medical surveillance, training and equipment required to participate in physical removal activities. Sector Jacksonville's policy is that volunteers shall not have direct contact with oil or other hazardous substances. However, volunteers may be used to support the following pre-designated activities with UC approval:

Habitat Surveyor: Sector Jacksonville may deploy these volunteers to assist in the habitat survey of pre and post spill shoreline and riverbank wildlife. Interested volunteers must be able to identify oil on the ground, structures or on plants versus a non-oiled environment, have a valid driver's license, be familiar with the local area without the use of street signs, and must attend HAZWOPER training.

Pre-impact Shoreline and Riverbank Cleanup: Sector Jacksonville may deploy these volunteers to assist with the ongoing pre-event maintenance and clean-up of coastal areas in an effort to minimize the potential amount of contaminated debris. Interested volunteers must be physically capable of walking, stooping, lifting, and carrying debris repositories. Volunteers must also be very familiar with the local area without the use of street signs, have a valid driver's license and must attend incident specific USCG orientation.

Delivery / Runners: Sector Jacksonville may deploy these volunteers to carry supplies, transport personnel, and other associated duties as assigned, to and from oil-impacted areas or other locations.

Interested volunteers must be in good physical condition, have a valid driver's license, be very familiar with the area without the use of street signs, and must attend incident specific USCG orientation.

Coast Watcher: Volunteers are community members who are very familiar with local beaches and can report any changes that may be attributed to the oil spill incident. Interested volunteers must be familiar with the local area and attend an on-site safety training.

Volunteer Coordination: Sector Jacksonville may deploy these volunteers to set up and manage a Volunteer Reception Center (VRC) or Volunteer Congregation Site. Interested volunteers need experience in dealing with convergent, unaffiliated volunteers. Volunteers must also be in good physical condition, have a valid driver's license, be very familiar with the local area without the use of street signs, and must attend incident specific USCG orientation as well as three hour VRC training.