



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

OCT 25 2012



PEP – ENVIRONMENTAL COMPLIANCE MEMORANDUM NO. ECM 12-4

To: Heads of Bureaus and Offices

From: Willie R. Taylor, Director
Office of Environmental Policy and Compliance

Subject: Departmental Procedures Related to Pollution Removal Funding
Authorizations Issued by Federal On-Scene Coordinators for
Reimbursable Oil Spill Response Activities

1. Background and Purpose

This memorandum provides guidance for DOI bureaus and offices for use by oil spill responders, related administrative staff, and budget and finance offices.

Oil spills pose a threat to human health and safety and frequently result in significant impacts to natural and cultural resources. The Federal Government has the responsibility to respond to oil spills pursuant to the Federal Water Pollution Control Act (Clean Water Act), the Oil Pollution Act, and the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP).

Federal oil spill responses are led by a Federal On-Scene Coordinator (FOSC) from either the U.S. Environmental Protection Agency (EPA) or the U.S. Coast Guard (USCG). For spills that occur in the inland zone, EPA provides the FOSC. For spills in the coastal zone, including the Great Lakes, the FOSC will be from the USCG.¹

Under the authority of the NCP, the FOSC leads and coordinates the federal oil spill response to:

- contain, remove, and dispose of the oil;
- protect threatened resources;
- ensure proper notifications are made;
- direct, coordinate and/or provide technical assistance for the federal response;

¹ Under CERCLA, the FOSC may be from the Department of Energy (DOE) or the Department of Defense (DOD) when the emergency response involves oil discharged from a vessel or facility under the jurisdiction, custody or control of DOE or DOD, respectively. (40 CFR 300.120c)

- maintain Federal decision-making authority for the response; and
- ensure access to necessary information.

To accomplish these objectives, the FOSC organizes and manages an incident-specific Incident Command or Unified Command (IC/UC)² to bring together various Government agencies to participate in the overall federal response effort. To ensure rapid and effective responses to oil spills, the FOSC uses the Oil Spill Liability Trust Fund (OSLTF) to fund response actions. The FOSC is the only official authorized to approve response-related expenditures from the OSLTF.

The FOSC frequently issues Pollution Removal Funding Authorizations (PRFAs) supported by funding from the OSLTF, to obtain needed oil spill response activities from other Government agencies (Federal, state, tribal, local), such as the Department of the Interior (DOI). PRFAs are essentially interagency reimbursable agreements that outline the spill response activities to be performed by other agencies for the FOSC.³

This guidance describes the roles and responsibilities of the various parties involved in the PRFA preparation, approval, and reimbursement processes.

2. Role of DOI Bureaus and Offices

The DOI Office of Environmental Policy and Compliance (OEPC) provides leadership, coordinates, and promotes consistency in carrying out DOI's roles and responsibilities for emergency response and remediation under the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP), including oil spill preparedness, contingency planning, emergency response activities, technical assistance, training, and exercises. In addition, OEPC represents the DOI on the International, National, and Regional Response Teams, key components of the National Response System (NRS). The NRS is the formal operational structure created by the NCP in which intergovernmental agencies participate. OEPC provides direction and management for the negotiation and

² The Incident Command (IC) is run by the FOSC to manage the spill response. The Unified Command (UC) is an Incident Command that includes staff from other federal, state, and/or local agencies. However, in practice, many responders use these terms interchangeably.

³ A DOI bureau/office that has been issued a PRFA may either perform the work itself, or have PRFA authorized tasks performed by another agency through a "subsidiary" Reimbursable Support Agreement (RSA); or by a private business through a contract; or by a Non-Governmental Organization through a cooperative agreement. However, the DOI bureau/office should check to make sure the FOSC/UC does not object to using such an arrangement. In order to be reimbursed for such costs, the agency must manage the RSA, contract, or cooperative agreement to make sure the work is adequately performed, and must properly document the costs of the work that is accomplished. This entails including a copy of the contract and supporting cost documentation such as invoices in the PRFA cost documentation package and reimbursement request that is eventually submitted to the FOSC.

implementation of PRFAs issued by FOSCs to DOI bureaus and offices and can provide coordination for their participation in incident-specific spill response activities.

FOSCs frequently request DOI, and its component bureaus and offices, to work as part of the Unified Command (UC) and to provide on-scene support to the FOSC by conducting a variety of spill response activities. Such assistance includes, but is not limited to the following:

- Monitoring water, shoreline, and other habitats to assist with emergency response/removal/cleanup decision making and provide wildlife resource information to the Incident Action Plan;
- Providing surveillance, including acquisition and use of aerial platforms, if appropriate, and site documentation of affected fish and wildlife habitat and resources to determine threats to species protected by the Endangered Species Act (ESA) and Migratory Bird Treaty Act (MBTA) and their supporting habitats, as well as to ascertain the presence of oil and oiled/impacted wildlife;
- Coordinating required consultations under Section 7 of the Endangered Species Act (ESA);
- Assisting the FOSC in complying with Section 106 of the National Historic Preservation Act (NHPA) Programmatic Agreement on Protection of Historic Properties During Emergency Response under the National Oil & Hazardous Substances Pollution Contingency Plan and providing additional guidance as necessary;
- Providing access control for DOI land management units (Fish and Wildlife Service for National Wildlife Refuges, National Park Service for NPS units such as National Parks, National Historic Sites, etc.);
- Arranging for hazing or other deterrence for migratory birds, as appropriate, in attempts to prevent injury or impacts (e.g., “oiling”) of such birds.
- Assisting the FOSC in establishing emergency response priorities and protection strategies in reference to habitats and environmentally sensitive areas and resources;
- Providing follow up periodic monitoring for spill/ related natural resource impacts if needed;
- Monitoring for affected birds and other wildlife and, when possible and necessary, transporting biota to wildlife rehabilitation facilities;
- Arranging for and supervising oiled wildlife rescue/rehabilitation personnel, facilities and efforts, as necessary, to include carcass removal and coordinating with law enforcement personnel to make sure proper licenses/permits are in place; (note: the Migratory Bird Treaty Act and the Endangered Species Act prohibit the possession, transportation, handling, etc., of wildlife protected under these and

other laws, by anyone other than those possessing licenses/permits under these Acts);

- Surveying DOI land management units⁴ to report to the FOSC on oil concentrations, threats and impacts to environmentally sensitive areas, adverse effects on wildlife, contaminated cultural resources, and contaminated public use areas, and recommending protective and mitigating measures to address adverse impacts; and
- Participating in the Unified Command's decision-making process on the ongoing federal response and to ultimately determine completion of cleanup activity by adopting and achieving cleanup standards for the impacted areas.

OEPC Regional Environmental Officers (REOs) assist DOI bureaus/offices in the PRFA negotiation, preparation, approval, and reimbursement process. See Attachments 1A and 1B for information on OEPC regional offices and REO contacts.

3. The Pollution Removal Funding Authorization (PRFA)

The PRFA is a document that commits the OSLTF to reimburse the costs incurred for activities undertaken by another government agency for response work performed on the federal oil spill response under the direction of the FOSC and the Unified Command. The FOSC may issue a PRFA to a DOI bureau or office to request support in areas of either bureau/office expertise and/or federal trust responsibility for natural and/or cultural resources. Only the goods, services, or spill response activities described in the PRFA are authorized by the FOSC for subsequent reimbursement from the OSLTF.

The PRFA should clearly outline and authorize:

- the approved reimbursement budget authority ceiling;
- the period of performance for conducting specified activities to support the oil spill response; and
- the goods or services to be provided by the agency to the FOSC. The description of these can be written either fairly broadly to encompass a range of activities to support the oil spill response, or can be written more specifically to clearly identify what the FOSC wants, or can be a combination of both general and specific assignments. The PRFA and any subsequent PRFA amendments will have a description of the oil spill response activities outlined in an attached statement of work (SOW).

⁴ For example, FWS National Wildlife Refuges, BLM Resource Areas, National Monuments, and NPS units such as National Parks, National Historic Sites, etc.

- The DOI bureau or office will likely be required to provide a cost estimate for the goods and services outlined in the PRFA. Such cost estimates will likely be required to be updated and show greater detail as the duration of the response grows.

Please note that a PRFA neither grants nor transfers funding to the bureau or office. It grants reimbursable budget authority contingent on the proper performance of the work outlined by the PRFA and the subsequent submission of well documented reimbursable costs that were incurred.

As previously mentioned, the FOSC is the only official authorized to approve reimbursement for response expenses from the OSLTF. An agency performing reimbursable work outlined by a PRFA is essentially working for, and taking direction from, the FOSC and the Unified Command and is participating in the incident command system (ICS), the doctrine that guides the operational cycles of the Incident Command / Unified Command.

Here is some useful guidance for DOI bureaus and offices to follow:

- **Before a DOI bureau/office conducts oil spill response activities, the FOSC-approved PRFA (and attached SOW) should be in place in order for that bureau/office to receive reimbursement from the OSLTF.**
- During an emergency oil spill response, time can be short and the situation can be chaotic, but **the PRFA and SOW should be signed before commencing work on the oil spill response.** A verbal approval may suffice temporarily in order to get assistance mobilized rapidly but that verbal approval needs to be documented and followed up with a signed PRFA as soon as possible.
- Failure or delay in doing so may prevent a bureau/office from obtaining subsequent reimbursement for oil spill response activities it conducts prior to the PRFA being signed and issued by the FOSC.
- The cost of performing work that is not outlined in the PRFA and its attached SOW or otherwise is not specifically requested by the FOSC is not reimbursable.
- If there are questions of whether certain work corresponds with the tasks outlined in the PRFA, ask the REO and the FOSC for clarification and interpretation, and then document their response and follow their guidance.
- Sometimes, it may be required to have the FOSC amend the PRFA to assign new tasks/activities to the bureau/office in order for such tasks/activities to be reimbursable.
- DOI bureaus and offices should seriously consider immediately setting up a separate Quicktime (payroll) account to record the reimbursable work hours

incurred by employees in the performance of PRFA-approved activities. By doing this, bureaus and offices can record reimbursable work hours in real time, and compile an automated record of payroll costs that can readily satisfy the USCG/NPFC's cost documentation requirements. Alternatively, bureaus/offices can set up reimbursable accounts subsequent to the oil spill response and later transfer reimbursable work hours and expenditures from their base account(s) into the reimbursable account, making sure to completely capture the reimbursable work hours and expenditures.

In any of the following instances, an OEPC REO should assist DOI bureaus and offices by negotiating with the FOSC the reimbursable work activities authorized in a PRFA, as the REO has special knowledge, experience, and skill in leading and coordinating DOI participation in oil spill preparedness and response. The REO should remain involved regarding communications and coordination with the FOSC concerning the work being performed by DOI bureaus/offices under a PRFA.

- DOI bureaus/offices may approach the FOSC with a request to perform response-related activities and have these first outlined and approved by the FOSC in a PRFA.
- Alternatively, the FOSC may approach DOI bureaus/offices and request they perform certain spill response activities outlined in a PRFA.
- In either case, DOI bureaus/offices may be directly requested by a FOSC or FOSC Representative (FOSCR) to respond to an oil spill incident.
- Many times, the FOSC will go through the REO with such requests.
- However, there could be instances when a DOI bureau/office unilaterally determines that it needs to respond based on notification of an oil spill. In these cases, the responding DOI bureau/office or REO should discuss with EPA or USCG the need to have an FOSC assigned and the need for a PRFA as soon as possible, and subsequently secure a PRFA that establishes a reimbursable funding ceiling to cover at least the expenses of the initial response activities.
- It should be noted that it might be possible to receive eventual reimbursement for response work performed prior to the PRFA being signed and issued if the initial response activities were appropriate and conducted in a time sensitive manner, and well documented.

See Attachment 2 for a blank PRFA template used by the U.S. Coast Guard's National Pollution Funds Center (USCG/NPFC), the organization charged with administering the OSLTF (http://www.uscg.mil/npfc/docs/PDFs/Forms/PRFA_Federal.pdf).

A sample Statement of Work (SOW) for a PRFA can be found in Attachment 3.

4. Expectations of Working under a PRFA

DOI bureaus and offices working under a PRFA are expected to participate in the Incident Command (IC) or Unified Command (UC) and communicate what they are doing. They are not to become “lone rangers” and perform their PRFA work either in a vacuum or by standing up their own parallel, independent commands outside of the IC/UC. DOI bureaus and offices working under a PRFA essentially are working for the FOSC by operating within the Incident Command / Unified Command.

Please note that it is important for DOI bureaus and offices to elicit clear direction on the work the FOSC requests they perform, and to document such communications.

5. Allowable Reimbursable Costs under a PRFA

Under the terms of a PRFA, an FOSC may agree to reimburse DOI bureaus/offices for costs incurred in providing any agreed upon oil spill response activities and assistance to the FOSC, consistent with the National Oil and Hazardous Substances Contingency Plan (NCP). The assistance needed will be set forth in the PRFA SOW and approved budget.

The following cost components are typically authorized for reimbursement:

- **All personnel payroll costs, including salary, benefits, and overtime pay.** Payroll costs should be documented for each deployed staff member and include their Grade/step, daily work hours, overtime work hours, salary, and benefits. It is advisable to keep a record of the daily work performed by each staff member. Each deployed staff member should record this data in a work log.
- **Travel, lodging, and per diem expenses.** Such costs should be clearly documented for each deployed staff by date, location, etc. and correspond to the approved Travel Vouchers retained by the bureau/office.
- **Appropriate charges for the utilization of other government agency owned equipment or facilities.** Such charges should be documented. DOI bureaus and offices should seriously consider obtaining advance USCG/NPFC approval for use of aircraft and other motor vehicles.
- **Contractor Costs.** Clearly document actual expenses for contractor goods and services obtained to provide agreed upon assistance and support to the FOSC.
- **Purchase or lease of goods or services.** Purchases made to support the response activities should be clearly documented by invoices or receipts that show the business, address, and dates. Such costs should be pro-rated when appropriate. For example, if a piece of equipment or a vehicle that is being used to carry out

assigned tasks is also being used for non-PRFA activities then the cost should be allocated proportionately. Both the service agreement contract and paid bills should be included in the reimbursement request.

- **Indirect Costs.** Costs may be subject to the application of an indirect cost rate if said rate has been certified in writing by the appropriate bureau/office senior official as being accurately formulated and applied. DOI bureaus/offices should ensure that the cost documentation package developed to satisfy subsequent reimbursement purposes includes their officially established indirect rate for federal Reimbursable Support Agreements. First time use of an indirect rate may require submittal of official DOI bureau/office policies concerning the indirect rate calculation documentation. The USCG/NPFC requires that the PRFA cost documentation package include a submittal of the inputs to the indirect cost model used to calculate indirect costs. If the cost allocation plan (CAP) mechanism is used to calculate burden and/or indirect costs, DOI bureaus and offices should seriously consider the guidance promulgated by the United States Department of Health and Human Services Program Support Center Division of Cost Allocation when developing such plans. Reimbursed indirect costs are potentially subject to audit by non-federal auditors. Therefore, the cost burden of indirect costs generated using a CAP may require extensive additional supporting documentation before being reimbursed.

6. Non-reimbursable Costs under a PRFA

Not all response costs are eligible for reimbursement under a PRFA. Only oil pollution removal/response activities outlined in a PRFA (and its SOW) are eligible for reimbursement. Such activities need to directly support the Federal response being conducted by the FOSC. Questions regarding whether an activity or cost is authorized under a PRFA should be referred to the REO involved in the PRFA approval process and the DOI bureau/office budget or finance office charged with coordinating with the FOSC. Some costs, such as those incurred unilaterally by a DOI bureau/office for executive leadership travel and management oversight are not eligible for reimbursement from the OSLTF if such activities were not requested by the FOSC and do not support the FOSC's work, but were incurred primarily for the benefit of the DOI bureau/office. However, such management oversight costs should be tracked and documented for potential cost recovery from other sources at a later date (e. g., possibly through a retroactive supplemental appropriation that covers previous activities or through cost recovery efforts that may be made later by the Department of Justice). It is important that DOI bureaus' and offices' PRFA cost documentation packages clearly identify that the work was performed for the FOSC according to the activities outlined in the PRFA.

Otherwise, such costs may be deemed non-reimbursable by the FOSC and USCG/NPFC in their reviews.

7. Financial Posting of Oil Spill Response Reimbursable Expenditures

Immediately upon being awarded a PRFA, the DOI bureau/office should create either a reimbursable account or reimbursable accounts for the expenditures it incurs for performing work under the PRFA and its SOW. The bureau/office should either post or transfer such reimbursable expenditures to the reimbursable account(s) in a timely manner. That way, the reimbursable account(s) will hold the PRFA qualified expenditures as debits to match up with eventual reimbursement received from the OSLTF. This also has the financial management benefit to the DOI bureau/office of “freeing up” its current appropriated funding to support its other base programs.

8. The Possible Need to Waive Bi-Weekly and Annual Overtime Pay Caps

During a response of extended duration, deployed staff may need to have their bi-weekly and/or annual overtime pay caps waived temporarily by their payroll office, in order to be fully paid for the work hours they perform.

Deployed staff should work with their payroll office to determine their bi-weekly and annual pay caps and identify the limitations on what each deployed staff can earn per pay period to include the comp time and credit hours being earned by staff working on the oil spill response, and determine how it will impact the cap on their annual pay.

In certain emergency or mission critical situations, a DOI bureau/office may apply an annual premium pay cap instead of a biweekly premium pay cap, subject to the conditions provided in law and regulation [see 5 U.S.C. 5547(b) and 5 CFR 550.106-550.107]. The amount of the annual premium pay cap is computed by multiplying the applicable biweekly rate by the number of biweekly salary payments in the given year [see 5 CFR 550.106(d)]. Although there is an average of 26.1 pay periods in a fiscal year, in some fiscal years some employees may have 27 biweekly salary payments. For these employees, the applicable annual cap is equal to the applicable biweekly rate multiplied by 27. Please cross check with your budget and finance offices for the particulars on this calculation, as it depends on the fiscal year.

DOI bureaus have certain delegated authorities that allow them to issue policies and procedures for exceptions to the biweekly limitation on premium pay. Employees must check with their bureau human resources office and servicing personnel to understand how exceptions can be applied for emergency work. Additionally, employees will need to coordinate closely with their timekeepers to ensure the work hours are properly coded.

9. Limitation Rules on PRFA Reimbursements

- The PRFA reimbursement may only be used to pay for the reimbursable expenditures that have been incurred for the response work performed by the bureau/office for the FOSC under the terms of the PRFA.
- The PRFA reimbursement can neither pay for future response activities nor augment the current appropriations of the DOI bureau/office. Bureaus and offices should consider obtaining a legal opinion that response activities do not constitute a budget augmentation if they have been responding to a Spill of National Significance (SONS) such as the Exxon Valdez and BP Deepwater Horizon.
- The availability of the reimbursement is subject to the period of availability of the appropriation that is being reimbursed. Coordinate with your REO in order to obtain a PRFA amendment to extend the performance period when necessary.
- The OSLTF uses “no year” money.
- If the reimbursement occurs after the close of the fiscal year (and if response work was performed using a current annual appropriation) then the reimbursement is not available for new obligations. DOI bureaus and offices should coordinate with their budget and finance offices regarding such appropriation issues.

These rules may be found at http://www.uscg.mil/npfc/laws_and_regulations.asp

10. Other Funding Sources to Support Response Costs

In the absence of an FOSC-issued PRFA, agencies supporting the oil spill response may subsequently request reimbursement directly from the USCG/NPFC by following its claims process outlined at <http://www.uscg.mil/npfc/Claims/default.asp>. However, the submission of a claim does not guarantee its reimbursement. In some instances, DOI bureaus/offices may also seek reimbursement directly from a Potentially Responsible Party (PRP), the entity which (may have) either spilled the oil or caused the oil to be spilled. In that case, bureaus/offices should work closely with their budget offices and with the Office of the Solicitor to prepare any necessary settlement agreements and related supporting documentation.

11. PRFA Amendments

A PRFA may be amended, at the FOSC’s discretion, to increase the authorized maximum reimbursement ceiling. This is usually done if additional assistance and support is desired by the FOSC, or if costs incurred for services provided by the DOI bureau/office exceed the original estimate. Alternatively, an FOSC may amend a PRFA to either

expand the reimbursable oil spill response activities that are authorized or to provide greater detail on such activities and their requirements. In any case, the OEPC REO handles the submission, coordination, and management oversight of the PRFA amendments.

12. PRFA Cost Tracking and Documentation

DOI bureaus and offices responding under a PRFA must track their costs and provide clear documentation to support subsequent reimbursement and federal cost recovery actions.

The USCG/NPFC has developed guidance for the preparation and submission of PRFA cost documentation entitled “Technical Operating Procedures for Resource Documentation under The Oil Pollution Act of 1990” (USCG/NPFC Instruction 16451.2). This document may be found at this hyperlink:

http://www.uscg.mil/npfc/docs/PDFs/urg/Ch2/NPFC16451_2.pdf.

In addition, OEPC REOs and the OEPC Resource Protection, Preparedness and Response Team can provide advice and/or assistance with the development of PRFA cost documentation packages, and should review all such packages for clarity and accuracy before they are submitted to the FOSC and the USCG/NPFC.

In order to be eligible for reimbursement, a PRFA cost documentation package must include:

- The level of detail equivalent to that found in the USCG’s Pollution Incident Daily Resource Report (CG-5136) for each employee. This includes:
 - the employee name
 - Grade/step or labor category
 - hourly pay rate (salary plus benefits)
 - overtime pay rate if applicable
 - number of hours worked on the response (differentiated between regular and overtime work hours)
 - net cost (hourly rate times hours worked), and
 - the duties provided in support of the FOSC for each day worked on PRFA response activities (*it is advisable for each deployed employee to maintain a daily work log*);
- Travel authorizations and travel claims with locations and dates (redacted as required);
- Receipts and use documentation for all equipment and vehicular resources; and

- Purchases must include copies of receipts. Purchases of equipment must be documented to determine their necessity for the oil spill response. (Note: this is best documented by retaining relevant emails and notes of communications made within the IC or UC, or from the FOSC.)

Attachment 4 provides a link to an EXCEL file that contains worksheets that may be used to capture and document applicable reimbursable costs.

PRFA cost documentation packages should be provided to the REO for review. The REO can identify where problems may exist in the package and recommend ways to improve the cost documentation. This quality control function helps the DOI bureau or office, as well as the FOSC and USCG/NPFC, by reducing the need to go back and forth to improve the PRFA cost documentation package to meet the FOSC and USCG/NPFC requirements. After the REO review has been performed, and any recommended cost documentation improvements made, the DOI bureau/office may either ask the REO to submit the PRFA cost documentation to the FOSC or submit it themselves, with a copy provided to the REO.

DOI bureaus and offices are required to store and maintain their PRFA cost documentation files so that they can be made available, if needed, to support future USCG/NPFC efforts to obtain cost recovery from the Responsible Party (RP). Accordingly, DOI bureau and office staff involved in the response should be prepared to provide such information, which may include daily work logs, in court proceedings if cost recovery efforts are litigated.

13. PRFA Reimbursement Requests

The PRFA cost documentation package should include a completed SF-1080 or SF-1081 that should clearly indicate where and how reimbursable payments are to be sent by the USCG/NPFC. The completed SF-1080 or SF-1081 constitutes the reimbursement request.

Required information for such a request includes the:

- Agency Location Code (ALC);
- reimbursable account number;
- point of contact information (name, email address, phone number, address);
- the PRFA document control number used by the USCG or EPA;
- the Federal Pollution Number (FPN) for the oil spill response assigned by the USCG/NPFC;

- a clear, aggregated breakout of the reimbursable costs (payroll, travel, lodging, per diem, purchases, etc);

These forms may be found at:

<http://www.uscg.mil/npfc/response/Cost%20Documentation/sf1080.asp>.

Completed PRFA cost documentation packages should be:

- certified by the appropriate DOI bureau/office manager (Regional Director or equivalent or delegated staff) and then
- forwarded to the REO who will review it for accuracy and clarity (however, for those rare instances in which the REO has not been involved in the PRFA approval process, completed packages may be submitted directly to the FOSC);
- the REO will then submit the PRFA cost documentation package to the FOSC for his/her review and approval;
- The FOSC will forward the PRFA cost documentation package to the USCG/NPFC for its review and approval (or disallowance of non-reimbursable expenses);

14. Execution of PRFA Reimbursements

Once the FOSC and USCG/NPFC have conducted their reviews of the PRFA cost documentation package and reimbursement request, they will approve reimbursement of the qualified expenditures and execute transfer of the reimbursement through the Internet Payment and Collection (IPAC) system and “push” the approved funds to the bureau or office reimbursable account identified in the SF-1080/1081. Concurrently, the USCG/NPFC will provide a “heads up” to OEPC of what has been approved for reimbursement and the total amount of the reimbursement. In turn, OEPC will provide this information to the DOI bureau or office and ask that they alert their budget and finance offices so that the reimbursement from the USCG/NPFC can be tracked and assured of being deposited into the correct reimbursable account.

Attachment 1A - REO Contact List

Attachment 1B - OEPC Regions Map

Attachment 2 - Blank PRFA Template

Attachment 3 - Sample Statement of Work

Attachment 4 – Cost Documentation Report (posted at:

https://portal.doi.net/oepec/_layouts/xlviewer.aspx?id=%2Foepc%2FShared%20Documents%2FDWH%20Example%20Worksheet%20in%20ECM%20draft%20for%20PRFA%5FGuidance%5F10%2D13%2D2012%2Exlsx&DefaultItemOpen=1)

ATTACHMENT 1A – REO CONTACT LIST

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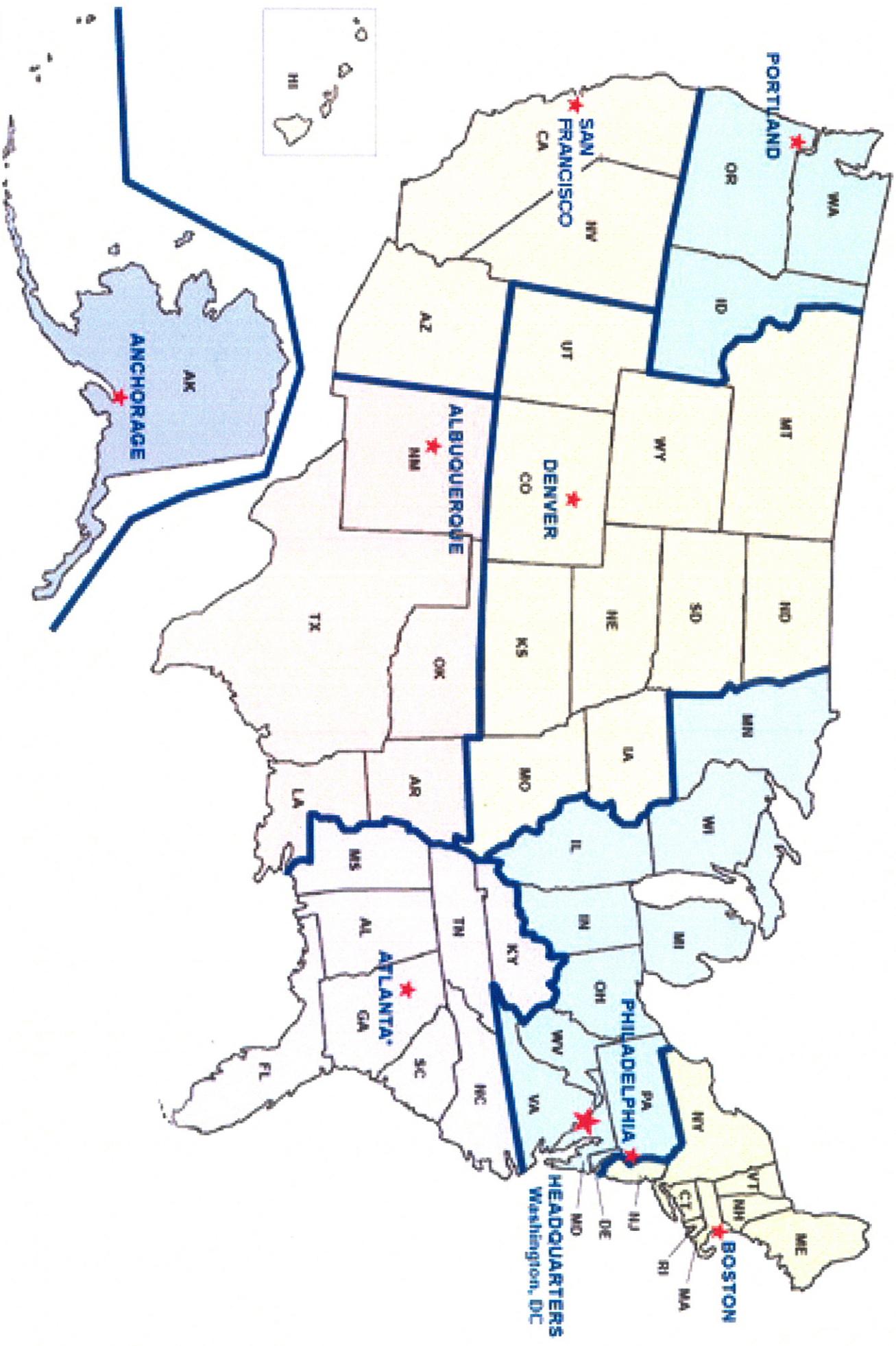
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U.S. DEPARTMENT OF THE INTERIOR Office of Environmental Policy and Compliance



**Federal Agency
Pollution Removal Funding Authorization**

Recipient Agency	
Address	
Agency Locator Code (ALC)	
Agency DUNS	
Agency Tax ID	

1. Purpose

This document authorizes reimbursement to the Recipient Agency from the Oil Spill Liability Trust Fund or CERCLA funds for certain removal costs incurred in response to the following pollution incident, _____.

Federal Project Number/CERCLA Project Number, _____.

This funding authorization is expressly contingent on the Recipient Agency's compliance with all requirements contained herein.

2. Approved Functions and Reimbursement Limit

Costs will be reimbursed only for actions that are directed or approved in advance by the FOSC. Approval may be verbal or written. Assessment, restoration, rehabilitation or replacement of natural resources damaged by the spill are not covered.

Maximum limit of authorization: \$ _____.

3. Conditions

See attached page(s) for scope of work, special conditions, date of performance, directions or approvals.

4. Period of Authorization

This authorization shall remain in effect until the completion date specified by the FOSC (which normally corresponds to the date of final removal activities).

5. Reimbursement Procedure

Upon completion of removal activities, the Recipient Agency will submit a SF-1080/1081 to the FOSC with detailed records of expenditures and activities for which reimbursement is sought. The agency may elect to use its own records providing an equivalent amount of documentation which has NPFC approval, or the agency may elect to use NPFC's Resource Cost Documentation package. The agency must submit the final request for reimbursement, supported by the required documentation, within 90 days following the completion date. If OMB Circular A-87 cost rates apply, cost certifications must be included. If at the end of the 90 days from final removal activities, there are any costs for which reimbursement has not been requested, written notice will be sent to the agency and 30 days later any balance remaining in the account will be deobligated.

**Federal Agency
Pollution Removal Funding Authorization**

6. Accounting Data

Document Control Number:	
Accounting String:	

7. Points of Contact

Federal On-Scene Coordinator	Telephone:
	FAX:
	Email:
Recipient Agency Representative	Telephone:
	FAX:
	E-Mail:
NPFC Case Officer	Telephone:
	FAX:
	E-Mail:

8. Authorizing Official

Federal On-Scene Coordinator

Signature: _____ Date _____

Attachments: (1) Scope of Work

Attachment 3:

PRFA
SAMPLE STATEMENT OF WORK FOR REMOVAL ACTIONS

The task list below addresses the specific removal actions that are ordered through PRFA's (Pollution Removal Funding Authorization) in support of FOSC's/OSC's. When modification or amendment to this PRFA is required, the "Amendment to Pollution Removal Funding Authorization" shall be used and a new task list shall be assigned if new tasking is identified.

The recipient agency of the PRFA shall perform the following (as identified by the appropriate check marks below):

- collect facts regarding the discharge of oil into navigable waters, to include its source and cause;
- identify potentially responsible parties (RP's);
- analyze the nature, amount, and location of discharged oil;
- analyze the probable direction and time of travel of discharged oil;
- identify pathways to human and environmental exposure;
- provide analysis of discharges posing a substantial threat to the public health or welfare of the United States;
- provide temporary/permanent stabilization prior to the mobilization of other responders;
- provide appropriate personnel, equipment, and supplies to contain and remove discharged oil from navigable waters and shoreline;
- document all site-specific costs incurred by the contractor and the recipient agency for the removal actions;
- identify active or historical facility processes or operations that may have contributed to the discharge of oil;
- prepare a sampling plan that describes the number, type, and location of samples and the type of analysis (for example, sampling and analysis plans for collection of multimedia environmental samples; petrochemical product or waste oil or crude oil);
- collect representative oil sample(s) and submit them to the U. S. Coast Guard Marine Safety Lab for appropriate analyses;
- develop site specific Health and Safety Plans (HSP's);
- review, prepare, and submit all required accounting/accounting records in accordance with the National Pollution Funds Center (NPFC) Instruction 16451, "Technical Operating Procedures for Resource Documentation under the Oil Pollution Act (OPA) of 1990";
- submit Pollution Reports (POLREPS) at periodic intervals as specified by the issuing FOSC/OSC;
- provide daily progress reports and/or consultations to the OSC/FOSC, as necessary;
- develop health and safety procedures for response activities, such as OSHA levels of protection associated with a site;
- recommend cleanup and disposal options;
- review completeness of disposal documentation, such as manifests, waste profile data, and other information;

5/24/96

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See www.uscg.mil/npfc/Response/Cost Documentation/prfa.htm for more information

- obtain permits from local, state or federal agencies, associated with the contractor's response activities;
- provide or arrange for site security to prevent unauthorized access of any persons or animals to preserve public safety, such as armed or unarmed security services;
- identify concerned local and elected officials;
- conduct deed and title searches as appropriate;
- conduct waste profile analysis;
- perform and advise on wildlife capture, recovery, and stabilization.