

Note: November 2022.

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COMDTINST 16465.41A
Jan 14 2008

COMMANDANT INSTRUCTION 16465.41A

SUBJ: DISTRICT RESPONSE GROUPS/DISTRICT RESPONSE ADVISORY TEAMS

Ref: (a) Federal Water Pollution Control Act (FWPCA), Title 33 USC 1321, as amended
(b) National Contingency Plan, Title 40 CFR 300.140, 300.145
(c) Safety & Health Training for Emergency Response Operations, COMDTINST 6260.31 (series)

1. **PURPOSE.** This instruction provides operational guidelines and responsibilities for the District Response Groups (DRGs) and District Response Advisory Teams (DRATs).
2. **ACTION.** Area, district, and sector commanders, commanders of maintenance and logistics commands, Deployable Operations Group, commanding officers of integrated support commands, commanding officers of headquarters units, assistant commandants for directorates, Judge Advocate General and special staff elements at Headquarters shall ensure compliance with the provisions of this Instruction. Internet release is authorized.
3. **DIRECTIVES AFFECTED.** District Response Groups/District Response Advisory Teams, COMDTINST 16465.41, is cancelled.
4. **BACKGROUND.** In 1992 the Coast Guard created oil and hazardous substance response advisory and assist teams to comply with Title IV of the Oil Pollution Act of 1990 (OPA 90) which required the formation of a District Response Group (DRG) and a District Response Advisory Team (DRAT) within each Coast Guard District. OPA 90 amended the Federal Water Pollution Control Act (FWPCA), the primary environmental legislation for USCG oil

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pollution response. Each Coast Guard District office was provided 4-6 new billets to meet this mandate.

- a. The initial Congressional draft of OPA 90 called for the establishment of strike teams at each Coast Guard District. However, a 1989 National Strike Force study recommended that response efforts would best be served if only one additional team was formed, increasing the total to three strike teams. This same report noted that a small group of technical experts at each District would enhance the Coast Guard's response posture, as well as make better use of existing resources. Thus, the final version of OPA 90 legislation required the establishment of the DRGs and DRATs at each District, rather than the earlier proposal of each District having a dedicated full complement strike team.
- b. Since the initial establishment of these response advisory and assist teams, DRATs have evolved and their composition now varies from District to District. Following Sector realignment and reorganization, many of the formerly consolidated DRAT functions have been decentralized within respective District offices, and in some cases, the billets reprogrammed. The specialized expertise of the DRATs and the services they provide are critical in maintaining oil and hazardous substance spill response readiness within the Coast Guard. While centralization of DRAT resources within the District is highly recommended, extensive collaboration and communication among DRAT components is vital, at a minimum.

5. DISCUSSION.

- a. The DRG concept evolved from a variety of legislative efforts. The DRG is not an operational entity in the traditional sense. It is a doctrinal concept that provides a framework within Districts to coordinate the identification, maintenance, mobilization, and deployment of oil and hazardous substance resources for response operations. It consists of:
 - (1) All Coast Guard units within a district's geographical boundaries (i.e., all vessels, all aircraft, all Coast Guard equipment, all personnel including reserve and auxiliary personnel, and resources from non-district units). The Coast Guard has pre-positioned pollution response equipment in strategic locations throughout the United States to enhance the capabilities of the DRGs. These resources are available for use in an incident, upon request, even if they are located in other districts.
 - (2) All pre-positioned oil and hazardous substance response equipment strategically located in the District; and
 - (3) A DRAT comprised of a sufficient number of personnel located at each District office to fulfill FWPCA and OPA 90 mandates.
- b. The DRG provides the framework within which Districts will organize their resources for a pollution response operation. This framework will help to ensure that all Coast Guard assets residing in the District can be brought to bear in the most efficient

manner, to assist the Federal On-Scene Coordinator (FOSC) in responding to an actual or substantial threat of discharge from a vessel, facility, or other source. The District Response Division is the focal point within a District organization for all activities involving the DRG. The District Commander is ultimately responsible for the organization and functional responsibilities of the DRG, as well as its response readiness.

- c. The DRAT is the nucleus of the DRG. While the DRAT is a part of the District staff, it is expected to maintain a liaison with the National Strike Force Coordination Center (NSFCC). The NSFCC fulfills the Coast Guard's statutory mandate in 33 U.S.C. § 311(j)(2) to provide logistical coordination for the use of private and public personnel and equipment to remove worst case discharges, and to review and maintain on file Area Contingency Plans (ACPs). Close coordination between the DRAT and NSFCC is necessary to accomplish their tasking.
- d. The DRAT is designed to be comprised of four to six billets and designated the coordinating body for the DRG. As a readily accessible, deployable team, the DRAT provides technical and logistical support for the FOSCs within their respective District. Their explicit responsibility is to enhance pollution response preparedness for each port within the District, and to provide expertise and technical assistance to the FOSC during oil spills or chemical releases. Each DRAT includes, at a minimum: 1) a Team Supervisor; 2) an Equipment Specialist; 3) an Environmental Specialist; and 4) an Oil Spill Liability Trust Fund (OSLTF) cost documentation specialist.
- e. The pre-designated DRAT "Supervisor" is the focal point within the District organization for all activities involving the DRG/DRAT. While recent organizational changes have resulted in a variety of billet structures for DRATs, the DRAT Supervisor and Equipment Specialist billets are best placed within the District's Incident Management Branch.
- f. DRAT members may be called upon to provide national level support under the National Response Plan for an Incident of National Significance and under the National Contingency Plan for Spills of National Significance or other major port emergencies. This may include participation within an Emergency Support Function at a Joint Field Office (JFO), as part of the JFO Planning Section's Environmental Unit or as a member of an Incident Management Assist Team (IMAT) deployed for a specific event, such as a major oil spill.
- g. The primary responsibility of the DRAT is to execute preparedness and response duties in support of the FWPCA and OPA 90 as outlined in this Instruction and in accordance with references (a) and (b). Within each District the Response Division, and more specifically the Incident Management Branch, shall serve as the focal point for all DRG/DRAT activities. While other duties may be performed in support of the District's multi-missions, the specific DRAT duties outlined in this Instruction and enclosure (1) take precedence. The Headquarters Program Manager, Commandant (CG-5332) and Area Commanders shall ensure that each District is equipped, funded,

and staffed to fulfill environmental management and response obligations as mandated by FWPCA and OPA 90.

- h. Commandant (CG-5332) is the program manager for the OPA 90 Environmental Protection Program and is available for clarification or guidance. Further details regarding the composition and roles of the DRG/ DRAT are included in enclosure (1).
6. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATION. Environmental considerations were examined in the development of this Instruction and have been determined to be not applicable.
7. FORMS/REPORTS. None.

WAYNE E. JUSTICE /s/
Rear Admiral, U. S. Coast Guard
Director of Response Policy

Encl: (1) District Response Group / District Response Advisory Team Functions and Responsibilities

**DISTRICT RESPONSE GROUP / DISTRICT RESPONSE ADVISORY TEAM
FUNCTIONS AND RESPONSIBILITIES**

1. Purpose. This enclosure defines specific responsibilities of the District Response Groups (DRGs) and District Response Advisory Teams (DRATs)
2. DRG Functions. Preparedness and Response.
 - a. Preparedness. Functions in this category include:
 - (1) Maintain a current, District-wide list of all specialized Coast Guard personnel and equipment available for response to discharges of oil or hazardous substances and other major port emergencies (i.e. validation of the appropriate portion of the national Response Resource Inventory list);
 - (2) Ensure training in response and site safety is provided to Coast Guard personnel within the District;
 - (3) Assist/support Sector level (i.e. Federal On-Scene Coordinator) planned and unannounced spill response exercise programs, (e.g. government unannounced industry exercises), to validate equipment capabilities; ensure lessons learned are initiated and recorded in the Contingency Preparedness System database.
 - (4) Provide logistical planning for the rapid deployment of District and National Strike Force (NSF) response equipment.
 - b. Response. The DRG shall provide assistance to the Coast Guard Federal On-Scene Coordinator (FOSC) as requested. Requests are likely to include, but are not limited to:
 - (1) Stage or deploy pre-positioned equipment in accordance with established and/or applicable guidelines (e.g. applicable Area Contingency Plan) or as appropriate to maximize its effectiveness in response to the specific case.
 - (2) Identify and deploy Area or District personnel with appropriate technical skills in support of tactical forces during spill responses and other major port emergencies.
 - (3) Provide contracting / finance officer support. Personnel deployed should have experience managing contracts utilizing funds from the Oil Spill Liability Trust Fund (OSLTF) or the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Superfund.
 - (4) Deploy Area or District communications equipment and support personnel.
 - (5) Deploy public affairs officers as required to assist the FOSC with all external affairs.
 - (6) Coordinate and manage reconnaissance and remote sensing air platforms for monitoring and analyzing spill trajectory. This includes the Forward Looking Infrared Radar (FLIR) and the Side Looking Aperture Radar (SLAR) systems.
3. DRAT Functions. Preparedness and Response.

- a. Preparedness. Functions in this category include:
- (1) Maintain all Coast Guard owned pollution response equipment within the District. "Maintenance" includes:
 - (a) Ensure adequate storage and annual equipment inspections occur.
 - (b) Accompany the National Strike Force Coordination Center (NSFCC) during annual maintenance provided under the National Maintenance Contract. The NSFCC will provide contracted support to perform preventative maintenance and repair;
 - (c) Process Casualty Report (CASREP) messages for damaged equipment. Routine messages shall be forwarded to NSFCC, Commandant (CG-432C), and (CG-5332);
 - (d) Ensure annual inspection and training oversight for first aid spill response equipment by conducting annual deployment of each piece of equipment not deployed during an actual incident or by certification during scheduled maintenance periods performed by National Maintenance Contract personnel when an annual deployment event is not practicable;
 - (e) Ensure annual inspection and training oversight for the pre-positioned first aid spill response equipment (trailers) located at field units.
 - (f) Develop logistical plans for the rapid transportation of pre-positioned equipment to a spill site within the District. This includes identifying and executing basic ordering agreements for ready access and transport of response equipment.
 - (2) Assist FOSCs and Area Committees in developing booming strategies and resource priorities. Additionally, DRATs will provide expertise to District and field unit contingency planning departments, as needed, to assist in Area Contingency Plan (ACP) update development, and ensure the interoperability of each Sector's ACP with the Regional Response Plan.
 - (3) Assist the FOSC in the identification of critical marine resources during the creation of Environmental Sensitivity Index (ESI) Atlases, and other response threat analyses. This function may include:
 - (a) Interface with other federal, state and local agencies;
 - (b) Participate in Area Committee activities related to these studies; and
 - (c) Ensure preparedness and response procedures are developed to address sensitive and at-risk resources in contingency plans.
 - (4) Coordinate and provide appropriate response training to the DRG. The DRAT may provide, with command support, training to other federal, state, and local response agencies within the District as time, funding and operations permit. Such training enhances interagency cooperation and the ability to work as a

cohesive team within a NIMS/ICS Unified Command Organization during a response. Response training shall include but is not limited to:

- (a) Response techniques (e.g. Oil Spill Response Technician (OSRT) Class C course).
 - (b) Hazardous Waste Operations and Emergency Response (HAZWOPER) training up to first responder operations level; see ref (c). (initial 40 hr and subsequent 8 hr annual refresher training). (MLCs may support) for general site workers, laborers, supervisory personnel for post emergency responders as detailed in 29CFR1910.120(q)(11) and (e)(3)(i) per ref (c). This includes the use of non-USCG training per ref (c).
 - (c) Vessel of Opportunity Skimming System (VOSS) and Spilled Oil Recovery System (SORS) deployment training.
 - (d) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Oil Spill Liability Trust Fund (OSLTF) administration and training.
 - (e) Shoreline Cleanup and Assessment Training (SCAT).
 - (f) Use of computer-based decision support, planning and response management systems (such as Computer-Aided Management of Emergency Operations (CAMEO)).
- (5) Coordinate and participate, as appropriate, in response drills and exercises. These drills and exercises must be documented in the Contingency Preparedness System database (CPS) as required by CG directives. Lessons Learned generated for exercises include, but are not limited to:
- (a) Annual VOSS deployments, including VOSS deployments on the 175-foot Coastal Buoy Tender (WLM).
 - (b) Annual SORS drills with each 225-foot Seagoing Buoy Tender (WLB).
 - (c) All Preparedness for Response Exercise Program (PREP) drills and exercises.
- (6) Maintain a data base of personnel and environmental response equipment within the District. This includes firefighting and salvage equipment. DRATs shall coordinate with the CG-5332 and the NSFCC to ensure resources, as appropriate, are captured in the Response Resource Inventory (RRI) database.
- (7) Participate in the NSFCC led preparedness assessment studies to ensure local area familiarity and verify Oil Spill Removal Organization (OSRO) capabilities.
- (8) Maintain an in-depth working knowledge of the operational parameters and capabilities of all Coast Guard owned DRG equipment.

- (9) Submit annual feedback to Commandant (CG-5332) on DRAT budget issues and a distribution analysis for funds expended over the previous year in support of DRG responsibilities.
 - b. Response: The DRAT shall perform the following functions if requested by the FOSC during a response:
 - (1) Serve as technical advisor to the District Commander, and/or FOSC as appropriate. Deploy to support field operations as requested.
 - (2) Ensure proper documentation is performed during an oil spill or other incident in accordance with Coast Guard directives.
 - (3) Coordinate staging and deployment of DRG resources including pre-positioned spill containment and recovery equipment.
 - (4) Identify and deploy District personnel with appropriate technical skills in support of tactical forces during spill responses and other major port emergencies.
 - (5) Serve with the District's or Area's Incident Management Assist Team (IMAT), and/or Joint Field Office team, as appropriate.
4. REQUIRED TRAINING. DRAT members must possess advanced spill response and incident management expertise. Function-specific training is encouraged and should be supported by the District Commander. However, minimal training shall include:
 - a. Hazardous Waste Operations and Emergency Response (HAZWOPER) training up to first responder operations level, see ref (c) (initial 40 hr and subsequent 8 hr refresher training).
 - b. IS 100-400, 700, and 800 (basic requirement)
 - c. IS 320 (Intermediate IMT), 341 (Incident Response), 410 (Adv IC), 620 (Area Command /JFO) – (recommended for DRAT Supervisor & Environmental Specialist).
 - d. Hazardous Materials Incident Response
 - e. Advanced Marine Fire Fighting
 - f. Scientific Training for Oil & Chemical Spills (Environmental Specialist)
 - g. Joint Information Center (JIC) or similar public affairs training
 - h. Oil Spill Response Technician (OSRT) "C" school
5. DRAT STAFFING AND TASKING. A DRAT shall be staffed by military and civilian personnel in a quantity adequate to effectively perform the tasks outlined in this Instruction. The original staffing levels funded by OPA 90 varied from 4-6 personnel depending upon the District's marine environmental pollution threats and risks. The typical composition was designed to include a DRAT supervisor (GS-13/14- O4), one to multiple Clean-up Equipment Specialist(s)/Environmental Engineer(s) (GS-11/12/13), one to multiple Environmental Protection Specialist(s) (GS-11/12/13), and a Pollution Fund Administrator/Logistician (GS-9/11/12 or E-7-O-2/3). Suggested delineation of

responsibilities are outlined below. The Area/District Commander may emphasize certain pollution response responsibilities to the members based on Area/District needs.

- a. DRAT Supervisor. Provide oversight to the DRG ensuring the District remains compliant with OPA 90 mandates. Additional duties may include:
 - (1) Identify and coordinate training for the DRG including federal, state, and local response agencies;
 - (2) Participate and evaluate, as required, in scheduled and no-notice exercises held within the district;
 - (3) Coordinate databases development for pollution response personnel and resources located within the District.
 - (4) Coordinate annual exercising of pre-positioned VOSS and SORS equipment within the District;
 - (5) Identify federal, state, local and commercial platforms capable of deploying the VOSS and establish Memorandums of Agreement with appropriate entities.
 - (6) Coordinate Regional Response Team meetings and activities, if applicable.

- b. Pollution Fund Field Administrator. Primary function, for districts with this position, is to serve as the environmental pollution response budget execution and documentation specialist for Districts and field units, the Maintenance and Logistics Commands, the Finance Center, the National Pollution Fund Center (NPFC), and Coast Guard Headquarters. This includes:
 - (1) Accountability of spill response funding requests to NPFC and proper dispensing of those funds;
 - (2) Expertise in federal contracting regulations, and ability to serve as a contracting specialist when so requested by the FOSC.
 - (3) Possess level one contracting warrant.
 - (4) Ensure appropriate event and cost documentation completion in accordance with Coast Guard directives.

Note: Not all units have these positions in which case it is expected that reach back support can be obtained from NPFC directly, through CG-5332, or through other districts.

- c. Equipment Specialist (Environmental Engineer). Possess an extensive and comprehensive knowledge of pollution response systems and associated operating parameters. These individuals will perform the following tasks:
- (1) Serve as DRAT point of contact for all technical assistance with Coast Guard owned equipment;
 - (2) Provide the District Commander or FOSC information on cleanup equipment capabilities and tactical strategies and operations;
 - (3) Maintain, operate, and direct the use of Coast Guard owned pollution response resources;
 - (4) Coordinate the deployment of equipment to any oil spill site as expeditiously and efficiently as possible;
 - (5) Train personnel in safety and pollution response techniques; and
 - (6) Maintain expertise in alternate response techniques such as dispersants and in-situ burning.
- d. Environmental Specialist. Responsible for collecting data regarding resources at risk within the geographical boundaries of the district. This individual, in conjunction with the National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator (SSC), will work with the scientific community, resource trustees, local environmental groups and agencies, as well as groups of concerned citizens as part of their outreach efforts. Other duties include:
- (1) Serve as the point of contact for all technical assistance issues involving environmental resource management.
 - (2) Serve as the point of contact for resource trustees.
 - (3) Ensure minimum environmental response training standards are met throughout the District and Area Committees.
 - (4) Assist FOSCs in the identification of environmentally sensitive ecosystems and development of the Environmental Sensitivity Indexes.