5/26/10

Mississippi Canyon 252 Incident
MOBILE LOCATION
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Name of Plan:	Odor Complaint Follow Up Process and Odor Call Log
Section:	Planning -- Environmental
Submitted By: (Name, Signature & Date)	April Mack (CTEH) April Mack 5/26/10
Reviewed by Planning Chief/ Deputy: (Name, Signature & Date)	Kathleen Flaherty 5/26/10 1840

Approved by:

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IC-EPA (Name, Signature & Date)	5/30/10

This plan has also been reviewed and agreed by:

Agency/ Team/ Name: (Name, Signature & Date)	ADEM
Agency/ Team/ Name: (Name, Signature & Date)	
Agency/ Team/ Name: (Name, Signature & Date)	
Agency/ Team/ Name: (Name, Signature & Date)	

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Original Plan Submittal & Copy Distribution

Name of Plan:	Odor Complaint Follow Up Process and Odor Call Log
Submitted By: (ICS Position, Signature & Date)	April Mack (CTEH) Environmental -- Air Sampling

Distributing Copies To:
(to be completed by person submitting plan and verified by Planning Chief or Deputy)

Section/ Unit	**# Copies**	**Received by** (ICS Position, Signature, Date)
Environmental	2	
Public Health	2	
Situation Unit	1	

General Public Odor Complaint Follow Up Process

Purpose

The purpose of this document is to clarify the process for handling odor report calls from the general public. Odor complaints have been received by local, state, and federal sources with inconsistent follow up due to lack of understanding of how to report and the appropriate follow up action required.

Background

Odor complaints can be received by a number of sources:

- The National Response Center (NRC)
- The Environment/Community Hotline established for the Deepwater Horizon (MC-252) response
- Other Hotlines established for the Deepwater Horizon (MC-252) response
- Locally established hotlines
- State issued Hotlines

Currently the Environmental Protection Agency (EPA) has responded to odor complaints in the gulf region from calls logged by the NRC. The Center for Toxicology and Environmental Health, L.L.C. (CTEH) is currently in place to respond to odor complaints that are received through the Mobile Incident Command Post (MICP) Situation Unit.

Goal

All crude oil vapor odor complaints and notifications reported to any of the hotlines bulleted above will be instructed to call the BP established Environment/Community Hotline, with the exclusion of NRC notifications. Calls will be received and filtered by the MICP Situation Unit. The Situation Unit will notify CTEH and EPA of odor complaints received.

Process

The following process will be utilized by MICP for odor complaint calls received via the hotline or WEB Emergency Operation Center (WEB EOC):

1. Odor complaints are to be called into 1-866-448-5816. The call is received in the Houston, TX call center. The operator will collect from the caller: name, call back phone number, physical address and zip code of where odor was noted, description of the odor, time of odor occurrence, and time/date of report. The operator will use the attached script for these calls. The operator will notify the MICP Situation Unit and relay the information received during the odor complaint call.

2. The MICP Situation Unit will log each call and track calls received by zip code. If 6 or more odor reports are received for any zip code area within a three-hour period, the Situation Unit Lead will notify the Environmental Unit Lead. The Environmental Unit Lead will then contact the Air Sampling Specialist (CTEH) who is available 24 hours a day. MICP Situation Unit will also provide a copy of each odor log to the EPA Air Data Board.

    a. The MICP Situation Unit will compile a daily report for each state showing total number of odor report calls by zip code. This report will be submitted to the MICP Public Health Unit.

3. Follow Up Procedure by Environmental Unit Air Sampling Specialist for 6 or more reports in a zip code area:

    a. The MICP Situation Unit will provide copies of all call report forms for the identified zip code area to the Air Sampling Specialist and the EPA.
    b. The Air Sampling Specialist will notify the air monitoring field team closest to the identified zip code area for investigation. The field team will reach the area of concern within 2 hours of notification by the Air Sampling Specialist unless a Vessel of Opportunity (VOO) is needed to reach the destination.
    c. If a VOO is needed to reach the area of the odor complaint, one will be requisitioned to carry out the procedure.
    d. The field team will conduct screening tests as defined by established sampling protocols. The field team will identify the presence or absence of odor upon arrival. If an odor is present, a description of the odor will be recorded by the field team. Real-time instrumentation will be used for air analysis and recorded on a handheld device. The Air Sampling Specialist will use the real time instrument readings to evaluate the conditions and instruct the field team to take a grab sample for laboratory method EPA TO-15 analysis if increased chemical concentrations are recorded by the real time instrumentation.
    e. The field team will report back to the Air Sampling Specialist the results of the investigation.
    f. The Air Sampling Specialist will notify the Environmental Unit Lead of the results from the investigation and describe any abnormal findings that require implementation of additional monitoring in the area. The Environmental Unit Lead will notify the Public Health Specialist of any conditions that must be addressed immediately.
    g. The Air Sampling Specialist will log investigation disposition in a spreadsheet established for odor events. This spreadsheet will be shared with the Environmental Unit Wildlife Leader. The Unit Leader will designate someone within the unit to compile odor event logs from both the Environmental Unit Air Sampling Specialist and EPA field team's data responding to odor complaints. The Air Sampling Specialist will also have all data entered into the EPA SCRIBE database.

h. A daily summary report of investigations will be provided to the Situation Unit by the Environmental Unit Lead by 00:00 hrs for inclusion of the daily situation brief.
i. All documentation related to the monitoring event will be provided by the Air Sampling Specialist to the Documentation Unit Lead for final disposition at the end of each operational period.

4. Follow Up Procedure by EPA:
   a. MICP Situation Unit will provide copies of all call report forms to the EPA's air board. EPA's staff will monitor the air board for odor complaints during the hours of 07:00 – 19:00. After hours odor notifications will be distributed by the MICP Situation Unit to EPA and the Environmental Unit Air Sampling Specialist (CTEH) via the dedicated odor phones assigned to each group.
   b. EPA has staffed air monitoring response teams.
   c. When EPA receives odor complaints, they will deploy a sampling team to the area of the complaint. The team will try to reach every call location but may have to take a representative sample of the area depending on the amount of calls.
   d. The teams are equipped with both screening instrumentation as well as air sample collection equipment.
   e. The teams are instructed to only collect a sample if a significant VOC level is reached on their screening instrumentation.
   f. Samples collected will be run on the EPA Environmental Response Team's Trace Atmospheric Gas Analyzer Mobile Laboratory equipped with a Gas Chromatograph-Mass Spectrometer or likewise equipment.
   g. The samples will be run for the compendium of analytes listed in EPA's Method TO-15.
   h. If screening levels are exceeded the EPA will make the appropriate notifications.
   i. All samples collected and analyzed will be entered into SCRIBE in addition to supplying the data to the Wildlife Specialist.

Call Center Operator script for callers reporting an odor:

Hello thank you for calling. My name is _____. How may I help you?

<Using the reporting form collect the following information from the caller>

- Name of Caller
- Physical address including zip code of where the odor was noted.
- Description of the odor
- Time of odor occurrence
- Date and time of call report

<Then convey the following information to the caller>

"As a part of the Deepwater Horizon Response, EPA and Center for Toxicology and Environmental Health are conducting ongoing 24 hour air monitoring of the Gulf region. Your call will be sent to them for further review and assessment."

<If caller asks about health effects operator should use the following>

"It is possible that what you smell may be related to the oil spill. The smell may be somewhat similar to what you can smell at a gas station or truck stop. Some people may be sensitive to these odors. It is possible that people with asthma may be more sensitive to these odors. If you feel ill, please call your health care provider."

<If caller is still concerned about health effects refer them to the National Poison Control Center at 1-800-222-1222.>

(Source CDC http://www.cdc.gov/nceh/oil_spill/information_residents.htm#5)

ODOR REPORTING FORM

Date:	Time:	Operator:

Hello, thank you for calling the Odor Complaint Hotline. My name is _____. How may I help you?

Description of the odor:

Caller's name:	Caller's tel #:

Address of the odor:

City:	State:	Zip:

Latitude/GPS Coordinates			Longitude/GPS Coordinates		
Deg	Min	Sec	Deg	Min	Sec

Complete your call by saying:

As a part of the Deepwater Horizon Response, EPA and Center for Toxicology and Environmental Health are conducting ongoing 24 hour air monitoring of the Gulf Region. Your call will be sent to them for further review and assessment.

If caller asks about health effects:

It is possible that what you smell may be related to the oil spill. The smell may be somewhat similar to what you can smell at a gas station or truck stop. Some people may be sensitive to these odors. It is possible that people with asthma may be more sensitive to these odors. If you feel ill, please call your healthcare provider.

If caller is still concerned:

**** If the caller is still concerned about health effects refer them to the National Poison Control Center at 1-800-222-1222.**

(Source: CDC http://www.cdc.gov/nceh/oil_spill/information_residents.html#5)

DRAFT

Odor Complaint Tracking Sheet

Date	Zipcode	City	State	Complaint Summary	Investigation			
					Initiated	Date	Status	Result

Investigation Initiated: YES/NO
Investigation Date: Date sampling team dispatched to location
Status: COMPLETE / PENDING
Result: POSITIVE / NEGATIVE / INCONCLUSIVE