

MEMORANDUM

To: All Municipal Chief Elected Officials

From: Gina McCarthy, Commissioner

Subject: Disaster Debris Management Planning

Date: September 6, 2006

The Department of Environmental Protection has been working with the Connecticut Department of Emergency Management and Homeland Security, as well the United States Environmental Protection Agency, Region 1, to prepare the state in protecting the health and welfare of Connecticut's citizens in the event of a major hurricane. This type of storm event would bring crucial debris management issues requiring quick decisions. As demonstrated by Hurricane Katrina's impact of high winds and flooding on the Gulf Coast, prompt debris removal and management is necessary to clear roads, restore critical services such as electricity and assist in recovery efforts.

Municipalities will be the first to respond to a disaster situation. To help ensure that municipalities have the necessary information for planning effective debris removal strategies, two documents are attached: The *Overview of Disaster Debris Management Planning for Connecticut Municipalities* and the *Debris Management Timeline*. Both documents are intended to offer you a brief, useful guide to the key elements for planning, mobilizing, organizing, and controlling a large-scale debris clearance, removal and disposal/recycling operation. To prepare in advance, each municipality should identify debris management site(s), identify labor and heavy equipment resources available for debris removal, and designate a command structure for debris removal operations.

I encourage all local officials to review their community's ability to manage large-scale debris management operations should the need arise. If you have any questions about the enclosed information, please call Frank Gagliardo in the Bureau of Materials Management and Compliance Assurance at (860) 424-3130.

OVERVIEW OF DISASTER DEBRIS MANAGEMENT PLANNING FOR CONNECTICUT MUNICIPALITIES

Overview

Natural and man-made disasters precipitate a variety of debris that includes but is not limited to trees, soils and sediments, construction and demolition materials, vehicles, and personal property. Such debris can be generated over a short period of time. It is advantageous to have a coordinated debris management plan developed in advance of a debris-generating event to expedite the response and recovery process.

In a major or catastrophic disaster, municipalities and Connecticut state agencies will have to locate staff, equipment, and funds to devote to debris removal in both the short and long term. Such activities will rely on debris disposal strategies and policies developed by DEP and, if necessary, be implemented under the Governor's emergency powers. The DEP will provide to the municipalities the necessary technical assistance and oversight to assure proper debris management, recycling and disposal. The State DOT will act as the lead state agency for emergency debris clearance from state roads. The Connecticut National Guard will be a primary support agency for both debris clearance and debris removal. Private contractors and waste disposal companies will play a significant role in the debris removal, collection, reduction, and disposal process of municipalities and State agencies.

The debris management program implemented by State agencies and municipalities will be based on recycling and material separation at the point of generation and at staging/processing locations. The goal will be to maximize potential processing and recycling options. Public education together with municipal, state, and federal cooperation will be imperative to effectively carry out this mission.

Mission Statement of the Connecticut Department of Environmental Protection

The Connecticut Department of Environmental Protection (DEP) will facilitate and coordinate safe and cost effective removal, collection, recycling and disposal of debris following a disaster, to mitigate against any potential threat to the health, safety, and welfare of impacted citizens, to expedite recovery efforts in the impacted area(s), to maximize recycling and reuse of debris, and to address any threat of significant damage to public and private property and to the environment.

Municipal Efforts

It is important to have a debris management plan as part of a local disaster response plan. Local municipal government is the first to respond to a disaster. Response efforts are first directed to activities that protect lives, public health and safety, such as evacuations, sheltering, fire fighting, utility restoration and clearing of road debris. Having a debris management plan that can be immediately implemented will expedite clean-up and a return to normalcy. Response efforts may be accomplished with local "force account" labor and equipment (in-house municipal employees and municipal equipment), contractors, volunteers, and assistance from adjacent communities. Municipalities must precisely document resource allocation in order to document requests for FEMA reimbursement of these resource expenditures.

Organization at Municipal Level

An organizational structure, identifying specific roles and responsibilities, should be established in the municipality's debris management plan in order to clearly identify who will activate the plan and oversee the associated activities. The organization structure should include the following:

- The overall Debris Manager for your municipal operations
- The Debris Managers/Points of Contact for support agencies
- Administrative support staff
- Field support staff/debris monitors
- A Public Information Officer for debris
- State and Federal partners.
- Private contractors, if needed.

Site Selection Prior to Disaster

Identifying debris management sites in advance of a debris-generating event expedites response and recovery. The following site characteristics items should be considered when selecting debris management sites:

- Publicly owned land (state or municipal)
- Large open space – should be at least 10 acres; greater than 50 acres is ideal for sites serving multiple municipalities or final regional debris staging sites before disposal.
- Relatively flat topography
- Good ingress and egress
- Minimal effect on residential neighborhoods, educational facilities, health care facilities, and environmentally sensitive areas.
- Location near final disposal sites to reduce hauling distances, if possible.
- No wetlands, endangered species, rare ecosystems, or other environmental restrictions
- No impact on historic or archaeological sites
- Accommodates separation and reduction of types of debris: vegetative, construction and demolition, household hazardous waste, commercial hazardous waste etc.
- Can accommodate types of site operations that may take place: chipping, grinding, recycling, and under permitted conditions by DEP – air curtain burning, and open pit burning.

State Efforts

Local governments (and state agencies) requiring public works/engineering support beyond the capability of the municipalities should submit requests for public works and engineering support to the State Emergency Operations Center. The state Department of Emergency Management and Homeland Security (DEMHS) will review such requests. If the request is consistent with State response priorities, or should otherwise be accorded a high priority, DEMHS will attempt to coordinate the provision of the requested public works/engineering assistance through available State assets, if any. Public works/engineering assets of the Connecticut National Guard, Department of Transportation, Department of Public Works, Department of Environmental Protection, and the Department of Public Safety or other State agencies may be utilized to support urgent public works requirements that are consistent with State-identified priorities or should otherwise be accorded a high priority for the purpose of State assistance. If assistance is not

available through assets of State agencies, then a request for Federal public works/engineering assistance will be considered.

The Federal Government

When the response and recovery efforts appear to be beyond the capacity of both the municipalities and the State, Connecticut may request Federal assistance, in the form of a Presidential Disaster Declaration. The Federal Emergency Management Agency (FEMA) evaluates the request and recommends to the President the type of federal assistance that is warranted. FEMA then implements a Federal Response Plan.

If an emergency or major disaster declaration is made under the authority of the Disaster Relief Act (Public Law 93-288) as amended by the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 101-707), assistance is usually provided in the form of financial reimbursement of a portion of the disaster-related costs. Debris removal costs incurred by municipalities and Connecticut would be evaluated and if determined eligible would be reimbursed on a cost sharing basis (normally 75% federal, 25% non-Federal).

In catastrophic disasters, FEMA can also provide direct Federal assistance to support municipalities and Connecticut in performing some of the activities related to debris removal, recycling and disposal. The response capabilities of both the municipalities and Connecticut must be clearly exceeded before this level of assistance can be provided. For a short and clearly defined time period, FEMA incurs all costs. However, as soon as possible, municipalities and the State are responsible for all debris removal activities.

FEMA may also direct other Federal agencies to provide debris removal technical assistance to municipalities and Connecticut. Technical assistance may be provided in contract preparation, bid solicitation, contract management, and debris disposal activities. Municipalities and the State remain responsible for all debris removal activities and are reimbursed for their eligible costs. The costs of Federal technical assistance may be the responsibility of FEMA.

Eligibility for Funding

Funds may be available through FEMA's Public Assistance grant program to reimburse applicants for eligible expenses incurred in performing disaster-related debris management operations. Determination of eligibility is a FEMA responsibility. **Contractors do not have the authority to make eligibility determinations.**

Generally, disaster-related debris located on public property and in public rights-of-way is eligible for FEMA reimbursement. Eligible disaster debris may include downed trees and other woody debris; sand, silt, mud and gravel; building wreckage; and vehicles in the right-of-way.

Debris on private property generally is not eligible for funding under the Public Assistance Program, but disaster-damaged personal property may be moved to the curbside to be picked up by an eligible applicant. Under extenuating circumstances, FEMA may approve removal of debris from private property on a case-by-case basis. Applicants should contact their State Emergency Management Agency for additional information prior to debris removal. Disaster debris that threatens private property may be eligible under FEMA's Individual Assistance Program.

Documentation

As part of the grant application process, FEMA requires applicants to provide detailed documentation to substantiate their claims. Types of documentation that an applicant should have readily available for FEMA review include:

- Insurance policies
- Contracting process documentation (RFQs, bid tabulations, etc.)
- Contracts used for debris removal and disposal
- Time sheets documenting type of employee and labor hours/Contractor time sheets
- Equipment usage logs with drivers, mileage, and dates used
- Load tickets/Truck scale records
- Debris Management Site addresses
- Debris monitoring reports (used to document work performed and to identify issues that arose)
- Environmental baseline information
- Final disposal locations and tipping fees

Applicants may use force account labor and resources (in-house employees and equipment) to accomplish part or all of the work after a disaster or they may use contractors. If contractors are used to do part or all of the work, the applicant must follow FEMA contracting guidelines to ensure maximum reimbursement for debris removal and disposal efforts.

Acceptable Contract Types

Time and Materials – *Cannot be used for more than 70 hours of actual work.* This type of contract is usually used immediately after a disaster to mobilize contractors to start emergency removal efforts. These contracts should have a termination clause and a not-to-exceed limit for both time and costs. The contract should be terminated when the first of these limits is reached.

Unit Price – *Is usually used when the scope of work is hard to define and is based on estimated quantities of debris.* Unit price contracts are based on weight (tons) or volume (cubic yards). These contracts require close monitoring during removal, hauling and disposal to ensure accuracy.

Lump Sum – *Should only be used when the scope of work is clearly defined and the areas of work can be precisely identified.* Lump sum contracts establish one price for all work included in the contract. The price is fixed unless the scope of work changes. This type of contract is easy to monitor when the scope is well defined.

A pre-awarded contract for emergency services may be used if the contract was competitively bid and prices are comparable with established rates in the region. The contract issuer may be a jurisdiction or a regional operational authority. “Piggybacking” by using an existing contract established by another jurisdiction is not recognized by FEMA as an acceptable form of contracting.

Cost plus a percentage, contingency contracts, and contracts awarded to debarred contractors are not allowed.

Contract Monitoring/Debris Monitoring

As a condition of the FEMA grant funding program , the applicant is responsible for ensuring that the contract is properly monitored so that quantities and expenses are documented to substantiate FEMA funding.

- Monitors should verify that debris picked up is eligible; measure truck load capacities; verify volumes or weights of debris in trucks; inspect pick-up areas, haul routes, temporary storage sites, and disposal sites, verify the contractor is working in assigned areas; and ensure other contract requirements are met.
- The applicant should train and deploy debris monitors to watch and document contractor activities. Debris monitors may come from the applicant's full-time work force, temporary hires, or contracted services. The applicant may also request FEMA/State assistance with debris monitoring. The costs of overtime, temporary hires, and contractors performing disaster-related debris removal work are eligible for reimbursement.
- For unit price contracts, the applicant should use load tickets to document weights and volumes of contractor vehicles and loads.
- For time and materials contracts, the applicant should document the times that contractor manpower and equipment are actively used (limited to 70 hours).
- The applicant can request debris monitor training from the State and FEMA.

DEBRIS MANAGEMENT TIMELINE

(see technical assistance resources listed at end of time line)

Before Disaster Strikes

- ❑ Identify an individual to act as the Debris Manager.
- ❑ Identify potential types and quantities of debris using U.S. Army Corps hurricane debris model (or other applicable model).
- ❑ Develop a local debris management plan (see technical assistance resources listed on next page).
- ❑ Identify debris management (storage and reduction) sites and final disposal site(s) and ensure that sites meet environmental and permitting requirements.
- ❑ Identify and train local municipal employees (force account labor) as debris monitors.
- ❑ Establish pre-positioned contracts for emergency services.
- ❑ Develop prescribed messages related to the debris cleanup process for the Public Information Officer.

Impending Disaster

- ❑ If practicable, stage equipment at facilities throughout the area to ensure widespread coverage for post-disaster response. (This way, in the event one equipment facility is destroyed, other equipment is still available.)
- ❑ Clear any pre-disaster road constrictions from all emergency evacuation routes and access roads to critical facilities.

0 – 70 Hours After Disaster

- ❑ Clear debris from emergency evacuation routes, access roads to critical facilities, and primary roadways.
- ❑ Send out rapid response teams to perform windshield surveys of damage and estimate debris quantities.
- ❑ Estimate magnitude of event against available resources to determine if additional assistance is needed.
- ❑ Notify municipal officials if a disaster declaration is needed.
- ❑ Activate pre-positioned contracts, if necessary.
- ❑ Start to issue messages to inform the public about what they should expect during clean-up.
- ❑ Perform emergency removal of debris if needed for life-saving measures.
- ❑ Conduct daily briefings with debris managers and other officials to update progress and discuss issues.
- ❑ Develop a traffic control plan along potential haul routes and at debris management and disposal sites.
- ❑ Coordinate with other municipal agencies regarding priorities and responsibilities.
- ❑ If additional contractor resources are needed, follow municipal processes for procurement.
- ❑ Request assistance from State EOC for additional monitors or debris removal resources, if needed.

70 Hours – 10 Days

- ❑ Coordinate debris removal efforts with contractor(s).
- ❑ Assign and deploy debris contract monitors to debris management zones to monitor contractor activities.
- ❑ Meet daily with debris managers and key officials to update progress and discuss issues.
- ❑ Continue to disseminate public information. Provide information about curbside debris pickup dates, household hazardous waste drop-off sites, and other debris-related public information.
- ❑ Maintain documentation for costs of debris clearance, removal and disposal.
- ❑ Enter debris load ticket information into a spreadsheet or database and update daily.
- ❑ Have your first meeting with your FEMA Public Assistance Coordinator. Be able to:
 - Identify your Debris Manager and provide contact information.
 - Provide the address and phone number of the Debris Management Center.

- Provide an estimate of debris quantities based on your Preliminary Damage Assessment.
- Identify how debris will be removed – in house using force account labor and/or by a Contractor.
- Provide addresses and maps of debris management sites.
- Provide addresses and maps of final disposal sites.
- Provide copies of all relevant contracts and be able to explain how bidding was completed. Discuss if contracts are lump sum or unit price.
- Provide contract rates for debris removal labor and equipment and tipping and other disposal fees.
- Explain the debris removal monitoring program to appropriate personnel.
- Discuss load ticket documentation.
- Discuss how other costs are being documented (time sheets, equipment logs, etc.)

10 Days – 90 Days (and Beyond)

- Continue to monitor debris removal activities.
- Continue to document debris removal and disposal activities and update appropriate documentation daily.
- Meet with key debris operations staff regularly. Provide updates to municipal officials and State and FEMA representatives. Provide an estimated timeline and completion date to the State and FEMA, if requested.
- When debris operations are complete, ensure that debris management sites are properly closed and restored in accordance with DEP requirements.

Technical Assistance Resources

CTDEP, Bureau of Materials Management and Compliance Assurance, (www.ct.gov/dep), (860) 424-3366; contact person: Frank Gagliardo

Public Assistance Debris Management Guide, U. S. Federal Emergency Management Agency (FEMA), (www.fema.gov)

Planning for Disaster, U. S. Environmental Protection Agency (www.epa.gov/epaoswer/non-hw/muncpl/disaster/disaster.htm#cando)

U. S. Army Corps of Engineers (www.usace.army.mil/)