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Table of Contents: Section I

Approval Document	iii
Promulgation Document	iv
Signature Page	v
Reviewer's Page	vii
Record of Changes	
Distribution List	
Authorities and References	
Executive Summary	
Introduction	
Purpose	
Plan Organization	3
The Hazards	3
Nature of the Hazards.	
A. Initial Warning B. Initial Detection	
C. Investigation and Containment of Hazards.	
Hazard Agents- (CBRNE)	
A. Chemical	4
B. Biological	
C. Radiological/Nuclear	
D. Explosive Devices E. Combined Hazards	
3. Potential Targets	
Situation And Assumptions	
1. Situation	10
2. Assumptions	14
Concept of Operations	15
1. Direction and Control	15
2. Communications	17
3. Warning.	18
Emergency Public Information. Protective Actions.	18
6. Mass Care	
7. Health and Medical	
8. Resources Management	
Organization And Assignment Of Responsibilities	20
Local Emergency Responders	
State Emergency Responders	
3. Local Emergency Planning Committees (LEPCs), State Emergency Response	
Commissions (SERCs), and Tribal Emergency Response Commissions (TERCs) 4. Federal Emergency Responders	

Administration And Logistics	22
Mutual Aid Agreements	2
Training	22
Testing the Plan: Training Requirements:	22
<u>FIGURES</u>	
Figure 1.1 Crisis and Consequence Management	2
Figure 1.2 Coordination Relationships in Terrorism Incident Response	17
TABLES	
Table 1.1 General Indicators of Possible Chemical Agent Use	5
Table 1.2. General Indicators of Possible Biological Agent Use	7
Table 1.3 General Indicators of Possible Radiological Agent/Nuclear Weapon Use	7
Table 1.4 Responses to a CBRNE Incident and the Participants Involved	16

Approval Document

"By my signature, I acknowledge that I, or my representative, have reviewed this plan, and recommend its approval for this jurisdiction."

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Promulgation Document

This HazMat-Terrorism Incident Response Plan is in force in our jurisdiction, and it has our full support. Tasked organizations have the responsibility to prepare and maintain Standard Operating Procedures and commit to the training and exercises required to support this plan.

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Executive Summary

Lewis & Clark County formed a Local Emergency Planning Committee (LEPC) in October 1987 to plan for a response to hazardous material incidents. The hazardous material response plan was updated by June 1, 1995 to meet the requirements of the Environmental Protection Agency's Superfund Amendments and Reauthorization Act of 1986 (SARA) and its Title III, the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). The act established a list of 300+ extremely hazardous substances, published in Federal Register 40 CFR 355, which requires community planning for releases.

The act also requires that private industry notify the local fire department and committee if there is a release of one of these substances. Private industry will send the local fire department and the LEPC <u>Tier Two</u> forms and <u>Material Safety Data Sheets</u> to report all extremely hazardous substances in reportable quantities. The quantities vary according to the substance.

In late 2002, the City of Helena received a grant to hire a Counter-Terrorism Planner for the purpose of preparing a Terrorism Incident Annex (TIA) to the existing Lewis & Clark County/City of Helena Emergency Operations Plan (EOP), and to both update and combine the existing county Hazardous Materials Incident Response Plan with this TIA.

Therefore, this new Emergency Management document is intended to provide guidance to response and support agencies in the event of intentional or unintentional incidents involving Hazardous Materials (HazMat) or terrorist actions involving the use of chemical, biological, radiological, nuclear, or explosive (CBRNE) materials or tactical violence. It will identify the key players and the plan of action, facilitate the escalation from a local first response to the more definitive federal response, and is designed to complement the State of Montana's and the Federal HazMat and terrorism incident response annexes.

Introduction

It is important to realize that all communities in Montana are vulnerable to a HazMat or terrorist incident. A HazMat or terrorist incident could threaten lives, property, and environmental resources through physical destruction by explosions and resulting fires, and/or by contamination with chemical, biological, and/or radiological materials. A cyberterrorist attack could destroy or significantly disrupt vital computer networks, communications systems, and/or Internet services, interfering with provision of critical community services and thereby causing substantial human and economic impacts.

The first responders in both a HazMat incident and an actual or suspected terrorist event will be from local emergency services. For this reason, the City of Helena/Lewis & Clark County have established and will maintain a comprehensive program to prepare for and manage the impacts of HazMat and terrorist events. The program provides for continuing assessment of the community's vulnerability to these types of incidents, planning, and training to prepare for and respond to such events, pre-deployment of specialized response capabilities throughout the area, and definitions of the operational concepts to be utilized to manage an actual or suspected event. If needed, State and/or Federal assistance will be mobilized to support the local command structure.

Not every HazMat incident is a terrorist event. However, any terrorist incident involving CBRNE materials is both a criminal act and a HazMat incident. Furthermore, the initial

response to any HazMat incident, intentional or not, will be essentially the same. Therefore, the focus of this plan will center on the unique planning issues presented by intentional acts of terrorism with the belief that proper planning for managing a terrorist event or intentional release of HazMat will concurrently apply to managing an unintentional release of HazMat as well. For the purposes of this document, the acronym CBRNE will be used to refer collectively to both WMD and HazMat materials and will be used interchangeably with both.

In addition to the federal laws and guidelines concerning HazMat incidents, Presidential Decision Directive 39 (PDD-39), "United States Policy on Counterterrorism", directs that measures be taken to reduce the Nation's vulnerability to terrorism, to deter and respond to terrorist acts, and to strengthen capabilities to prevent and manage the consequences of terrorist use of a Weapon of Mass Destruction (WMD). PDD-39 further distinguishes between *crisis management* and *consequence management*.

Crisis management refers to measures to identify, acquire, and plan the use of resources needed to anticipate and/or resolve a threat or act of terrorism. The federal government has the authority to prevent and respond to acts of terrorism; state and local governments provide assistance as required. Crisis management is predominantly a law enforcement response. Based on the situation, a federal crisis management response may be supported by technical operations, and by federal consequence management, which may operate concurrently.

Consequence management includes measures to protect public health and safety; restore government services, and provide emergency relief to governments, businesses, and individuals affected by the consequences of terrorism. The states have the primary authority to respond to the consequences of terrorism; the federal government provides assistance as necessary (see Figure 1.1).

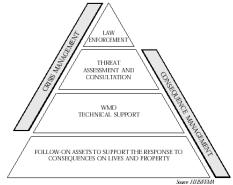


Figure 1.1 Crisis and Consequence Management

Purpose

The purpose of this Hazmat-Terrorism Incident Response Plan is to establish the policies, programs, and procedures that will be utilized by local agencies to prepare for, respond to, and recover from a threatened or actual emergency resulting from a terrorist act or the release of hazardous materials.

Although suggested operational procedures are presented in this document as a guide in managing HazMat and/or terrorist incidents, it is not meant to replace the guidance of the Lewis

& Clark County EOP or the agency field operations guides for first responders. Effective tactical planning and training must still take place at the agency level in order to facilitate the overall effectiveness of this document.

Plan Organization

This plan is organized around four primary sections:

- Section I: <u>Administrative Data</u> is intended to address those components of the plan that
 form the overall foundation and ensure the continuity and functionality of the plan as a
 whole.
- Section II: Incident Management System (IMS) is a major component of the plan and is considered to be vitally important to all operations regardless of the size of the incident or the duration of the event.
- Section III: Emergency Response is intended to address those items that are critically important to emergency responders at the onset of an incident or event that threatens the public safety or health of the community.
- Section IV: Resources and Information is intended to provide emergency responders
 with the appropriate reference materials and information necessary for the mitigation of
 an incident or event.

The Hazards

1. Nature of the Hazards.

The hazard may be chemical, biological, radiological/nuclear, and/or explosive. It is believed that the most likely terrorist threat locally is that of an explosive or incendiary device. Hazardous Materials analysis has concluded that the public is at greatest risk from truck accidents because of the heavy vehicle traffic on the highway and Interstate I-15. In 1998, the USDOT reported that there were over 800,000 shipments of hazardous materials by truck every day in the U.S. USDOT further reported that over 32 percent of those vehicles carrying HazMat were improperly placarded. Studies show that truck hazardous material incidents usually pose the most problems for first responders because of the confusion in identifying the product and coordinating effectively in a multi-departmental response.

A. Initial Warning.

While specific events may vary, the emergency response and the protocols followed should remain consistent. When a HazMat or terrorist incident occurs, the initial call for help will likely come through the local 911 center. This caller probably will not identify the incident as a terrorist incident, but rather state that there was an explosion, a major "accident," or a mass casualty event. Information relayed through the dispatcher prior to arrival of first responders on scene, as well as the initial assessment, will provide first responders with the basic data to begin responding to the incident. With increased awareness and training about intentional CBRNE incidents, first responders will hopefully recognize when a terrorist incident has occurred and be able to take appropriate action.

B. Initial Detection.

The initial detection of a CBRNE terrorist attack will likely occur at the local level by either first responders or private entities (e.g., hospitals, corporations, etc.). Consequently, first responders and members of the medical community—both public and private—should be trained to identify hazardous agents and take appropriate actions. State and local health departments, as well as local emergency first responders, will be relied upon to identify unusual symptoms, patterns of symptom occurrence, and any additional cases of symptoms as the effects spread throughout the community and beyond. First responders must be protected from the hazard prior to treating victims. Section III contains an overview of first responder concerns and indicators related to chemical, biological, and nuclear/radiological WMDs.

The detection of a terrorism incident involving covert biological agents (as well as some chemical agents) will most likely occur through the recognition of similar symptoms or syndromes by clinicians in hospital or clinical settings. Detection of biological agents could occur days or weeks after exposed individuals have left the site of the release. Instead, the "scene" will shift to public health facilities receiving unusual numbers of patients, the majority of whom will self-transport.

C. Investigation and Containment of Hazards.

Local first responders will provide initial assessment or scene surveillance of a hazard caused by an act of CBRNE terrorism. The proper local, State, and Federal authorities capable of dealing with and containing the hazard should be alerted to a suspected CBRNE attack after State/local health departments recognize the occurrence of symptoms that are highly unusual or of an unknown cause. Consequently, State and local emergency responders must be able to assess the situation and request assistance as quickly as possible. For a list of Federal departments and agencies with counterterrorism-specific roles and for telephone and online resources from selected organizations, see Section IV.

2. Hazard Agents- (CBRNE)

Weapons of mass destruction are defined as any weapon that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals; disease organisms; radiation or radioactivity; or explosion or fire. At least two important considerations distinguish these hazards from other types of terrorist tools. First, in the case of chemical, biological, and radioactive agents, their presence may not be immediately obvious, making it difficult to determine when and where they have been released, who has been exposed, and what danger is present for first responders and medical technicians. Second, although there is a sizable body of research on battlefield exposures to WMD agents, there is limited scientific understanding of how these agents affect civilian populations.

A. Chemical.

Chemical warfare agents are intended to kill, seriously injure, or incapacitate people through physiological effects. Chemical warfare agents fall into one of four categories: Blister Agents, Blood Agents, Choking Agents, and Nerve Agents. A terrorist incident involving a chemical warfare agent will demand immediate reaction from emergency

responders—fire departments, police, hazardous materials (HazMat) teams, emergency medical services (EMS), and emergency room staff—who will need adequate training and equipment. Hazardous chemicals, including industrial chemicals and agents, can be introduced via aerosol devices (e.g., munitions, sprayers, or aerosol generators), breaking containers, or covert dissemination. Some indicators of the possible use of chemical agents are listed in Table 1.1.

Table 1.1 General Indicators of Possible Chemical Agent Use

1. Stated Threat to Release a Chemical Agent

2. Unusual Occurrence of Dead or Dying Animals

• For example, lack of insects, dead birds

3. Unexplained Casualties

- Multiple victims
- Surge of similar <u>911</u> calls
- Serious illnesses
- Nausea, disorientation, difficulty breathing, or convulsions
- Definite casualty patterns

4. Unusual Liquid, Spray, or Vapor

- Droplets, oily film
- Unexplained odor
- · Low-lying clouds/fog unrelated to weather

5. Suspicious Devices or Packages

- Unusual metal debris
- Abandoned spray devices
- Unexplained munitions

Early in an investigation, it may not be obvious whether an outbreak was caused by an infectious agent or a hazardous chemical; however, most chemical attacks will be localized, and their effects will be evident within a few minutes. _There are both persistent and nonpersistent chemical agents. _Persistent agents remain in the affected area for hours, days, or weeks. _Nonpersistent agents have high evaporation rates, are lighter than air, and disperse rapidly, thereby losing their ability to cause casualties after 10 to 15 minutes, although they may be more persistent in small, unventilated areas.

• **HazMat:** Outside of a deliberate attack, the possibility of an unintentional chemical release remains due to normal business activity in the area. A HazMat incident is most likely to occur from a truck accident rather than from a rail, fixed site, or pipeline accident. National statistics show that trucking accidents outnumber rail hazmat incidents by about 12 to 1 because of the proliferation of trucks and their vulnerability on the highways.

The most common hazardous products carried by truck are:

- gasoline
- liquefied propane gas

- chlorine
- anhydrous ammonia

Although railroad hazardous material incidents occur less frequently than with trucks, the danger is significantly greater because more product is involved. Montana Rail Link trains travel through Helena and East Helena about 15 times daily, and a hazardous material incident along this railroad line could put thousands of people at risk.

The most common hazardous chemicals carried by train are:

· sulfuric acid

- anhydrous ammonia
- liquefied propane gas

• flammable/combustible liquids

The most common and Extremely Hazardous Substances, as listed by the EPA, which are identified, stored, or transported through the county are:

chlorine

sulfuric acid

· anhydrous ammonia

There are a number of HazMat sites in the area such as:

- 1. Allen Oil: bulk storage of petroleum products
- 2. Chemical Montana: chlorine and other caustics and corrosives
- 3. Agri Feed: ammonium nitrate bin
- 4. Montana Rail Link Yard: sulfuric acid, liquefied propane gas and anhydrous ammonia
- 5. Diamond Products: corrosives
- 6. St. Peter's Hospital: liquid oxygen
- 7. Decorative Industrial Plating: acids and cyanides
- 8. *Helena Public Works Department*: **chlorine** (six sites containing tanks). The largest is the Wastewater Treatment Plant on Custer Avenue, with three one-ton and fifteen 150 lb containers of chlorine.
- 9. ASARCO: sulfuric acid
- 10. City of East Helena: **chlorine** (two storage tank sites)
- 11. Missouri River Water Treatment Plant: chlorine
- 12. Montana Propane: propane
- 13. Ten-Mile Water Treatment Plant: chlorine

B. Biological

Recognition of a biological hazard can occur through several methods, including identification of a credible threat, discovery of bioterrorism evidence (devices, agent, clandestine lab), diagnosis (identification of a disease caused by an agent identified as a possible bioterrorism agent), and detection (gathering and interpretation of public health surveillance data).

When people are exposed to a pathogen such as *anthrax* or *smallpox*, they may not know that they have been exposed, and those who are infected, or subsequently become infected, may not feel sick for some time. This delay between exposure and onset of illness, or incubation period, is characteristic of infectious diseases. The incubation period may range from several hours to a few weeks, depending on the exposure and

pathogen. Unlike acute incidents involving explosives or some hazardous chemicals, the initial response to a biological attack on civilians is likely to be made by direct patient care providers and the public health community.

Responders should be familiar with the characteristics of the biological agents of greatest concern for use in a bioterrorism event (see <u>Tab A: Biological Agents</u>). Unlike victims of exposure to chemical or radiological agents, victims of biological agent attack may serve as carriers of the disease with the capability of infecting others (e.g., *smallpox*, *plague*). Some indicators of biological attack are given in Table 1.2.

Table 1.2. General Indicators of Possible Biological Agent Use

- 1. Stated Threat to Release a Biological Agent
- 2. Unusual Occurrence of Dead or Dying Animals
- 3. Unusual Casualties
 - Unusual illness for region/area
 - Definite pattern inconsistent with natural disease
- 4. Unusual Liquid, Spray, or Vapor
 - Spraying and suspicious devices or packages

C. Radiological/Nuclear

The difficulty of responding to a nuclear or radiological incident is compounded by the nature of radiation itself. In an explosion, the fact that radioactive material was involved may or may not be obvious, depending upon the nature of the explosive device used. Unless confirmed by radiological detection equipment, the presence of a radiation hazard is difficult to ascertain. Although many detection devices exist, most are designed to detect specific types and levels of radiation and may not be appropriate for measuring or ruling out the presence of radiological hazards. Table 1.3 lists some indicators of a radiological release.

Table 1.3 General Indicators of Possible Radiological Agent/Nuclear Weapon Use

- 1. A stated threat to deploy a nuclear or radiological device
- **2. The presence of nuclear or radiological equipment** (e.g. spent fuel canisters or nuclear transport vehicles)
- 3. Nuclear placards or warning materials along with otherwise unexplained casualties

The scenarios constituting an intentional nuclear/radiological emergency include the following:

(1) Use of an **Improvised Nuclear Device (IND)** includes any explosive device designed to cause a nuclear yield. Depending on the type of trigger device used, either uranium or plutonium isotopes can fuel these devices. While "weapons-grade" material increases the efficiency of a given device, materials of less-than-weapons-grade can still be used.

- (2) Use of a **Radiological Dispersal Device** (**RDD**, "Dirty Bomb") includes any explosive device utilized to spread radioactive material upon detonation. Any improvised explosive device could be used by placing it in close proximity to radioactive material.
- (3) Use of a **Simple RDD** that spreads radiological material without the use of an explosive. Any nuclear material (including medical isotopes or waste) can be used in this manner.

D. Explosive Devices.

The easiest to obtain and use of all weapons is still a conventional explosive device, or improvised explosive device (IED), which may be used to cause massive local destruction or to disperse chemical, biological, or radiological agents. The components are readily available, as are detailed instructions to construct such a device. Improvised explosive devices are categorized as being explosive or incendiary, employing high or low filler explosive materials to explode and/or cause fires. Bombs and firebombs are cheap and easily constructed, involve low technology, and are the terrorist weapon most likely to be encountered. Large, powerful devices can be outfitted with timed or remotely triggered detonators and can be designed to be activated by light, pressure, movement, or radio transmission. The potential exists for single or multiple bombing incidents in single or multiple municipalities. Historically, less than five percent of actual or attempted bombings were preceded by a threat. Explosive materials can be employed covertly with little signature, and are not readily detectable. Secondary devices may be targeted against responders.

E. Combined Hazards.

CBRNE agents can be combined to achieve a synergistic effect—greater in total effect than the sum of their individual effects. _They may be combined to achieve both immediate and delayed consequences. _Mixed infections or intoxications may occur, thereby complicating or delaying diagnosis. _Casualties of multiple agents may exist; casualties may also suffer from multiple effects, such as trauma and burns from an explosion, which exacerbate the likelihood of agent contamination. _Attacks may be planned and executed to take advantage of the reduced effectiveness of protective measures produced by employment of an initial CBRNE agent. _Finally, the potential exists for multiple incidents in single or multiple municipalities.

3. Potential Targets

As demonstrated by the attacks on the World Trade Center in New York, the Pentagon, and the Murrah Federal Building in Oklahoma City, the United States is not immune to terrorism. Terrorists may strike from abroad or be citizens residing in the U.S. The use of nerve agent in the Tokyo subway showed they may also employ chemical agents and material in addition to planes, guns, or explosives to achieve their objectives.

Historically, terrorist attacks have occurred at places of special significance, against identifiable segments of the population, on dates of interest to the terrorist or the intended victims, and at unique events; however, any place people gather in large numbers could be a terrorist target. Enclosed areas with air recycling or HVAC systems are of special concern with regard to chemical, biological or radiological weapons.

Potential attacks on elements of the nation's infrastructure require protective considerations. Infrastructure protection involves proactive risk management actions taken to prevent destruction of or incapacitating damage to networks and systems that serve society, according to the 1997 report of the President's Commission on Critical Infrastructure Protection. This commission was formed in 1996 to evaluate the vulnerability to disruption of the nation's infrastructures, including electric power, oil and natural gas, telecommunications, transportation, banking and finance, and vital government services. The commission's report, issued in October 1997, concluded, "Waiting for disaster is a dangerous strategy. Now is the time to act to protect our future."

Infrastructure protection often is more focused on security, deterrence, and law enforcement than on emergency consequence management preparedness and response. Nevertheless, planners must develop contingencies and plans in the event critical infrastructures are brought down as the result of a terrorist incident.

1. Potential target locations include:

- a) Locations of special significance such as historical monuments, courts of law, religious buildings, financial centers, government offices, research or medical facilities, embassies and diplomatic residences, and universities/ schools.
- b) Transportation nodes such as mass transit stations (bus, rail, or subway), airports, aircraft, ports, and ships.
- c) Gathering places such as shopping areas, restaurants and bars, sport venues (especially indoor arenas), theaters, amusement parks, and disaster scenes.
- d) Hazmat storage facilities.

2. Potential target populations include:

- a) Religious or ethnic minorities.
- b) Political opposition groups.
- c) Controversial groups.
- d) Government agencies or workers, including emergency responders.

3. Dates or anniversaries of significance may include:

- a) Government holidays (especially independence, liberation, or revolution days).
- b) Days or times reserved for special religious observances or holidays such as Yom Kippur, Ramadan, Christmas, etc.
- c) Important dates in the lives of famous or controversial figures or celebrated martyrs of the terrorist's cause (especially dates of birth, arrests, convictions, or death).
- d) Dates that are famous and/or significant to a terrorist (e.g., the anniversary of Roe vs. Wade for anti-abortionists, April 15 for federal tax protesters, the incidents at Waco Texas or Ruby Ridge Idaho for anti-government extremists).

- 4. Times when casualties or damage would be greatest and response would be most difficult. Examples might include:
 - a) Rush hour.
 - b) During a period of large-scale civil unrest such as protests or riots.
 - c) Following response to a significant disaster such as a flood or earthquake.
- 5. During special events such as:
 - a) Awards or inauguration ceremonies.
 - b) High profile trials.
 - c) Conferences of high-ranking people.
 - d) Celebration parades for holidays, sports championships, or military victories.
 - e) Large sporting or community events.

Situation And Assumptions

1. Situation.

There are many different definitions and opinions of just what constitutes an act of terrorism. Since federal law directs that the FBI is the lead federal agency for any suspected or confirmed act of terrorism, the FBI's definition of terrorism will be used for this Plan:

<u>Terrorism</u>: the unlawful use of force against persons or property to intimidate or coerce a government, the civilian population or any segment thereof, in the furtherance of political or social objectives.

Furthermore, it is generally accepted that any use or threatened use of a Weapon of Mass Destruction (WMD) is considered a terrorist act.

To date, there have been no actual terrorist incidents involving WMD in Montana. Past acts of terrorism in Montana have been relatively low and mainly directed against government agencies, banks, Planned Parenthood offices, and individuals. The methods employed were either economic in nature, incendiary, explosive, or involved assault. Property destruction, arson, computer crimes, and bank and wire fraud were the most common forms of economic terrorism. The use of explosives and biochemical methods by terrorist groups or individuals in Montana has been rare within the State and has been mainly directed against out-of-state interests and individuals.

It is believed that groups active in Montana will conduct a terrorist act in the future. Given the transient nature of the groups active in the state, the possibility still exists that they will travel to another jurisdiction to commit their crime. Montana has traditionally attracted activist/extremist individuals and groups because of its low population, large geographic area, and relative isolation. Groups active in Montana vary from white supremacists to single issue groups, such as environmental extremists. These groups are attracted to the state and many of them view Montana as their "home" or safe haven. Because of this view, they commit their illegal activities outside of the state. Some examples of extremist activity in Montana include:

- The Unabomber, <u>Ted Kaczynski</u> who advocated the destruction of technology and the protection of the environment and was responsible for sixteen bombings and three deaths around the United States. He assembled his devices in the rural Montana community of Lincoln and had them delivered out of state.
- The World Church of the Creator, (aka *The Creativity Movement*) a white supremacist group with a national following that has their national meeting in Superior, Montana once a year. This group advocates a "Racial Holy War" against minorities and members of this group have been responsible for numerous homicides in the United States. Despite their religious sounding rhetoric, this group does not believe in God, heaven, hell or eternal life. Its belief system, Creativity, "is a racial religion" whose primary goal is the survival, expansion, and advancement of the White Race exclusively. This group's headquarters is now in Riverton, WY.
- The Phineas Priesthood of Spokane, WA have used western Montana as a place to hide. Phineas Priests believe that white people are the true Israelites, that people of color were created inferior to white people, and that Jews were created by Satan. They believe that the Satanic Jews are taking over the government and are instituting a New World Order and that they have been called by Yahweh to restore God's Law through assassination, bombing, and robbery. They consider themselves God's executioners for race traitors.
- The Freemen, a sovereign citizen group, conducted an eighty-one day standoff with law
 enforcement in eastern Montana. At the conclusion it was determined they were a
 "refuge" for individuals around the country involved in criminal anti-government activity.
 Several of these individuals had spoken about military type action against the current
 government.

The possibility also exists that a terrorist incident may take place as a result of Montana's large border with Canada, which is approximately 600 miles long with 21 official border-crossing points and numerous unofficial crossings. This results in Montana being a potential infiltration point for terrorists conducting operations in the United States. A 1999 report by the <u>Canadian Security Intelligence Service</u> states, "Canada's proximity to the United States, a common border, large expatriate communities, and a healthy economy, draw representatives of virtually every terrorist group in the world to this country [Canada]."

Known terrorist cells operate in the border regions of Canada. In 1999, an operative of a terrorist organization was arrested while attempting to enter the United States from Vancouver, Canada. He was carrying a large improvised explosive device scheduled to detonate at a Los Angeles area airport. The United States Border Patrol and the Customs Service in Montana continue to intercept individuals who are attempting to enter the United States illegally and smuggle contraband into this country.

The most likely assessed terrorist threat locally is that of an explosive or incendiary incident. Other WMD devices are considered only a remote possibility with the possible exception of a biological agent.

In fact, Montana has already felt the impact of the biological threat. The nationwide anthrax campaign in the Fall of 2001 was designed to inflict casualties and instill terror in the US population. From October 1 – November 3, 2001, Montana had 65 reports of suspicious items that required testing by the Department of Public Health and Human Services for

Anthrax. To date, there have been no positive test results for Anthrax in Montana, but these reports have taxed the resources of local, state, and federal agencies throughout the state. While direct attacks on Montana's citizens cannot be ruled out, a more realistic threat is posed by mail that has been cross-contaminated in out-of-state postal facilities.

Another possible terrorist venue especially relevant to Montana is a biological attack on agricultural commodities that comprise a significant portion of Montana's economy. Possible "Agriterrorism" scenarios include the introduction of <u>foot and mouth disease</u> into the cattle population that would result in the quarantine of all Montana livestock. This particular disease recently devastated Britain's livestock market. In the Spring of 2003, a representative of the *People for the Ethical Treatment of Animals* (PETA) made a statement that the introduction of this disease into livestock would not be a bad thing. In fact, an introduction of this type of biological agent into the agricultural system would cause economic disaster for the state.

Several sites exist in Montana that manufacture or conduct experiments with biological materials that could be considered hazardous if they are released. These sites along with the Malmstrom Air Force Base's nuclear facilities should be considered as potential targets.

Unfortunately, the rural nature and geographic diversity of Montana limit effective response in many regions. Help for local responders, many of whom are volunteers, is often miles, and hours, away and federal assistance could be days or even weeks in coming. Fortunately, Lewis & Clark County is home to both an Explosive Ordnance Disposal (EOD) team and one of the six regional HazMat teams.

a. Demographics: Lewis and Clark County is 107 miles long and 75 miles wide, with a



More than 65% of Montana's population live within a 125-mile radius of Helena.

population of approximately 55,716 (2000 Census). Population for the greater Helena valley is estimated at approximately 50,000 people with 26,000 residing within the Helena city limits, 1,600 within the city of East Helena, and 19,900 in unincorporated portions of southern Lewis and Clark County. estimated 3,500 people also live within northern Jefferson County, which borders the southern edge of the Helena Tourists are city limits. attracted to the county in the summer months, and many people recreate along the lakes

and Missouri River. The fairgrounds, just west of Helena, probably gets the largest concentration of people in the county during the year when up to 15,000 spectators watch the rodeo on the last weekend of each July.

- b. **Weather:** A majority of the county is on the east slope of the Continental Divide and the climate is semi-arid. The rainy season is in May and June, with an average precipitation of 11.7 inches of rainfall. The majority of prevailing winds blow from the west, northwest direction. Approximately 34% of the prevailing winds are less than 3 mph, which is considered officially to be calm or no wind.
- c. Geography: There are seven (7) major Flood Plains designated in the county: Ten Mile, Prickly Pear and Silver Creeks in the Helena Valley, Elk Creek in Augusta, the Blackfoot River in Lincoln, the Sun River north of Augusta and the Little Prickly Pear Creek near Canyon Creek. The Missouri River runs the Eastern length of the county north to Great Falls. Canyon Ferry Reservoir is a major recreation area east of Helena. Besides the rivers, streams, and lakes, other significant water considerations for hazardous materials response planning are the high water table in the Valley and the numerous marshy areas along the streams. Water will frequently pond on road intersections or run along the roads during heavy rains, which could carry along solid or liquid hazardous materials to larger waterways. The ground water could rise significantly during the rainy season of May and June.
- d. **Seismic Considerations:** Seismicity of the Helena area is high with two major earthquakes of 6.3 and 6.0 on the Richter Scale striking the Helena area in 1935. Helena is classified as a *Seismic Zone 3*, which means that another major earthquake may strike at any time, which may in turn cause hazardous material incidents.
- e. Critical Infrastructure: Presidential Decision Directive 63 (PDD 63) was issued in May 1998. It established the Critical Infrastructure Assurance Office (CIAO) and outlined steps to be taken to protect critical infrastructures from disruptions that could have serious public health and safety, economic, or national security impacts. Critical infrastructure is defined as, "physical and cyber systems essential to the minimum operations of the economy and government." The Counter-Terrorism Operations & Planning section has identified the following categories of critical infrastructure, with guidance from PDD 63, for our local area:
 - 1) Continuity of Government Services
 - 2) Banking & Finance
 - 3) Commercial/Industrial Facilities
 - 4) Electric Power, Oil/Gas Storage
 - 5) Emergency Services
 - 6) Information and Communications
 - 7) Institutions
 - 8) Transportation
 - 9) Public Health
 - 10) Water Supply
 - 11) Recreational Facilities
 - 12) Miscellaneous

Potential targets have been identified throughout the jurisdiction in each of the above categories and are continually being cataloged and assessed for vulnerability and risk to either a terrorist attack or HazMat incident.

2. Assumptions

- a) This plan will go into effect when a CBRNE_Terrorism incident has occurred or a credible threat has been identified.
- b) A HazMat or terrorist incident may occur at any time with little or no warning.
- c) A terrorist incident may be made readily apparent to the responding organizations by the characteristics of the impacts or a declaration on the part of the perpetrators, or may be very difficult to initially detect and identify because of uncertainty as to the cause or extent of the situation.
- d) The resources and/or expertise of local agencies could quickly be depleted by a response to a major incident and its consequences. Extensive use of Area, State, and Federal resources and intrastate mutual aid agreements must therefore be anticipated.
- e) Specialized resources, as well as those normally utilized in disaster situations, will be needed to support the response to a large-scale HazMat or terrorist incident. Such resources may not be located in the Area or in the State of Montana.
- f) The Department of Health will have access to a Bio-safety Level 3 laboratory available for analytical services to assist in the response to a terrorist event.
- g) Resources from local, state, and federal agencies, as well as from private organizations, will be made available on a timely basis upon request.
- h) All local response agencies and organizations will establish or participate in a <u>unified command</u> structure at or near the scene, and the emergency operations center of the responding jurisdictions will be activated and staffed (if indicated by the size or scope of the incident).
- i) Federal agencies with statutory authority for response to a terrorist incident, or for the geographic location in which it occurs or has impacted, will participate in and cooperate with the unified command structure established by the responding local jurisdiction.
- j) A terrorist event will result in the timely activation of the comprehensive emergency response plans of the local jurisdictions impacted. When needed, the Montana Disaster & Emergencies Services (DES) will activate the Montana Disaster & Emergency Plan, and the Federal Emergency Management Agency (FEMA) will activate the Federal Response Plan (FRP).
- k) Responding county and municipal jurisdictions will have supportive plans and procedures, as well as appropriately trained and equipped personnel, that may be needed for the general response operations related to management of the terrorist incident. This annex assumes the resources and procedures for such related operations as hazardous material response, mass casualty incident management, law enforcement, search and rescue, and others will be in place to be utilized when needed during a terrorist incident.
- For terrorist events involving weapons of mass destruction, there may be a large number of casualties. Injured or ill victims will require specialized medical treatment, potentially including decontamination and medical facilities and may require establishing temporary medical operations in the field. Fatally injured victims may be numerous and their bodies contaminated or infectious. Special mortuary arrangements are likely to be necessary.

- m) Terrorist incidents may involve damage or disruption to computer systems, telecommunications networks, or Internet systems; disturbance to vital community networks for utilities, transportation, or communication; and/or could endanger the health and safety of the population at risk, interrupt emergency response operations, and result in substantial economic losses.
- n) There will be very extensive media interest in a terrorist event and media management operations will require resources beyond those needed for other types of emergency management operations.
- o) The City of Helena/Lewis & Clark County have taken proper precautions such as firewalls and password access to their computer systems and have implemented the same reporting mechanism that was used during Y2K for cyber incidents.

Concept of Operations

1. Direction and Control.

The chief elected officials of the jurisdiction have the ultimate responsibility for the health, safety, and welfare of the public in their jurisdiction while operational control for the incident remains with the agency or agencies responsible for the incident response.

Local emergency response organizations will respond to the incident scene(s) and make appropriate and rapid notifications to local, State, and Federal authorities (<u>Table 1.4</u>). This may include calls to:

- The National Response Center (1-800-424-8802)
- MT DES (1-406-841-3911)
- The local FBI office (1-406-443-3617)

Control of the incident scene(s) will be established by local first responders from either fire or law enforcement through the use of the Incident Command System (ICS). The ICS that will initially be established will likely transition into a Unified Command (UC) as mutual-aid partners and State and Federal responders arrive to augment the local responders. This UC structure will facilitate both crisis management and consequence management activities. The County Emergency Operations Center (EOC) will be activated as appropriate.

The site of a terrorist CBRNE incident is a crime scene as well as a disaster scene and although the protection of lives, health, and safety remains the top priority, steps must be taken to secure the scene and preserve evidence as much as possible. The FBI is the Lead Federal Agency (LFA) for investigating incidents of terrorism and will deploy a pre-appointed On-Scene Commander (OSC) to any suspected or confirmed terrorist act. Local, State, and Federal interface with the FBI OSC is coordinated through the FBI's Joint Operations Center (JOC). The FBI, working with local, State and Federal officials in the command group at the JOC, will establish operational priorities. In the event of a significant Hazmat release, the EPA will also play a key role in accordance with federal law and will

¹ Table 4 provides an overview of events likely to occur in a WMD incident. It is designed to help understand the interface that State and local response will likely have with Federal response organizations. The table includes both crisis management and consequence management activities that would be operating in parallel and is intended to illustrate the complex constellation of responses that would be involved in a WMD incident.

likely send an EPA OSC to manage their efforts. <u>Figure 1.2</u> summarizes the coordination relationships between the UC and other response entities in a terrorist incident.

Table 1.4 Responses to a CBRNE Incident and the Participants Involved

	Events	Participants
1.	Incident occurs.	r ar ucipants
2.	911 center receives calls, elicits information, dispatches first responders, relays information to first responders prior to their arrival on scene, makes notifications, and consults existing databases of chemical hazards in the community, as required.	911 Center, first responders.
3.	First responders arrive on scene and make initial assessment. Establish Incident Command. Determine potential CBRNE incident and possible terrorist involvement; warn additional responders to scene of potential secondary hazards/devices. Perform any obvious rescues as incident permits. Establish security perimeter. Determine needs for additional assistance. Begin triage and treatment of victims. Begin hazard agent identification.	Incident Command: Fire, Law Enforcement, Emergency Medical Services (EMS), and HazMat unit(s).
4.	Incident Command manages incident response; notifies medical facility, emergency management (EM), and other local organizations outlined in Emergency Operations Plan; requests notification of Federal Bureau of Investigation (FBI) Field Office.	Incident Command.
5.	Special Agent in Charge (SAC) assesses information, supports local law enforcement, and determines if WMD terrorist incident has occurred. Notifies Strategic Information and Operations Center (SIOC), activates Joint Operations Center (JOC), coordinates the crisis management aspects of WMD incident, and acts as the Federal on-scene manager for the U.S. government while FBI is Lead Federal Agency (LFA).	FBI Field Office: SAC.
6.	Local Emergency Operations Center (EOC) activated. Supports Incident Command, as required by Incident Commander (IC). Coordinates consequence management activities (e.g., mass care). Local authorities declare state of emergency. Coordinates with State EOC and State and Federal agencies, as required. Requests State and Federal assistance, as necessary.	Local EOC: Local agencies, as identified in basic Emergency Operations Plan (EOP).
7.	Strategic local coordination of crisis management activities. Brief President, National Security Council (NSC), and Attorney General. Provide Headquarters support to JOC. Domestic Emergency Support Team (DEST) may be deployed. Notification of FEMA by FBI/SIOC triggers FEMA actions. ^a	SIOC: FBI, Department of Justice (DOJ), Department of Energy (DOE), Federal Emergency Management Agency (FEMA), Department of Defense (DoD), Department of Health and Human Services (HHS), and Environmental Protection Agency (EPA).
8.	Manage criminal investigation. Establish Joint Information Center (JIC). State and local agencies and FEMA ensure coordination of consequence management activities.	FBI; other Federal, State, and local law enforcement agencies. Local Emergency Management (EM) representatives. FEMA, DoD, DOE, HHS, EPA, and other Federal Response Plan (FRP) agencies, as required.
9.	State EMS support local consequence management. Brief Governor. Declare state of emergency. Develop/coordinate requests for Federal assistance through FEMA Regional Operations Center (ROC). Coordinate State request for Federal consequence management assistance.	State EOC: State EMS and State agencies, as outlined in EOP.
10.	DEST assists FBI SAC. Merges into JOC, as appropriate.	DEST: DoD, DOJ, HHS, FEMA, EPA, and DOE.

- 11. FEMA representative coordinates Consequence Management Group. Expedites Federal consequence management activities and monitors crisis management response to advise on areas of decision that could impact consequence management response.
- 12. Crisis management response activities to incident may continue.
- Federal response efforts coordinated and mission assignments determined. A consequence management support team deploys to incident site. All EOCs coordinate.
- 14. An Emergency Response Team Advance Element (ERT-A) deploys to State EOC and incident site, as needed. Base installation sites identified for mobilization centers. Liaisons from WMD-related agencies requested for Emergency Support Team (EST) and ROC. Disaster Field Office (DFO) liaisons as needed (may be after extended response phase).
- 15. A consequence management support team provides operational technical assistance to Unified Command.
- 16. Recovery operations. Transition of LFA from FBI to FEMA.

FBI, FEMA, EPA, DoD, DOE, HHS, and other FRP agencies.

FBI, Incident Command System (ICS), Special Operations, Hazardous Materials Response Unit (HMRU), Joint Technical Operations Team, Joint Inter-Agency Intelligence Support, and additional authorities, as needed.

ROC and regional-level agencies.

ERT-A: Regional-level FEMA and FRP primary support agencies, as needed.

FEMA, DOE, DoD, HHS, EPA, and FBI.

 $^{^{\}rm a}$ FEMA may initiate FRP response prior to any FBI/SIOC notification.

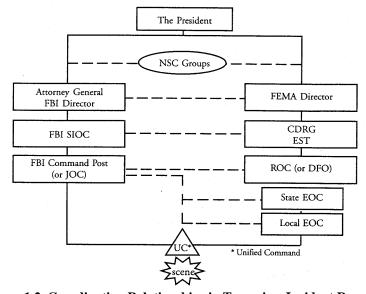


Figure 1.2 Coordination Relationships in Terrorism Incident Response

2. Communications.

In the event of a CBRNE <u>incident</u>, rapid and secure communication <u>is</u> crucial to ensure a prompt and coordinated response. Established local radio channels and plans will be utilized in accordance with existing agreements and regulations.

The Incident Commander, either personally or through delegation, will ensure the development of an Incident Radio Communications Plan (IRCP) as soon as possible utilizing appropriate ICS forms (*see ICS forms* 205 & 217.) Clear text and ICS terminology will be used in all communications to facilitate understanding by all responders.

The county EOC has nine phone lines and five radios to facilitate communications. It also has a high frequency radio that can provide long range communications for over 100 miles to other EOCs in the state as well as other public and private radio systems, and one VHF radio for communicating with responders outside of the jurisdiction. In addition, the local area has an active amateur radio network that can also assist with emergency communications through coordination with the EOC.

In the past, terrorist attacks have been shown to overload nondedicated telephone lines and cellular telephones. In these instances, the Internet has proven more reliable for making necessary communications connections, although it must be recognized that computers may be vulnerable to cyber attacks in the form of viruses. Close cooperation with the County ITSD will be needed to facilitate the use and security of Internet communications.

3. Warning.

<u>Every</u> incident <u>is</u> different. There may or may not be warning of a potential incident. Factors involved range from intelligence gathered from various law enforcement or intelligence agency sources to an actual notification from the terrorist organization or individual.

The warning or notification of a potential terrorist incident could come from many sources; therefore, open communication among local, State, and Federal law enforcement agencies and emergency response officials is critical. The local FBI Field Office must be notified of any credible terrorist threats or incidents.

A seven-tier local response guide has been developed by the Counter-Terrorism Operations & Planning Section to assist local government in establishing appropriate security measures in response to the Department of Homeland Security Advisory System (HSAS) warnings. The guide outlines increasing levels of response to increasing levels of threat ranging from negligible all the way to an actual attack, response, and recovery. This response guide is also compatible with the FBI's four-tier threat level system. (see Section IV: Local Response Levels Guide)

4. Emergency Public Information.

Accurate and expedited dissemination of information is critical when a CBRNE incident has occurred. Preservation of life and property may hinge on instructions and directions given by authorized officials. In the event of a terrorist attack, the public and the media must be provided with accurate and timely information on emergency operations.

Establishing and maintaining an effective rumor control mechanism will help clarify emergency information for the public. The Incident Commander will coordinate initial interaction with the media either personally or through delegation. Once the Emergency Operations Center (EOC) has been activated, an appointed Public Information Officer (PIO) will handle public information coordination in accordance with the County EOP. To facilitate and control the release of information, the FBI may establish a Joint Information Center (JIC) comprised of representatives from Federal, State, and local authorities for the

purpose of managing the dissemination of information to the public, media, and businesses potentially affected by the incident. An act of terrorism is likely to cause widespread panic, and ongoing communication of accurate and up-to-date information will help calm fears and limit collateral effects of the attack.

5. Protective Actions.

Evacuation may be required from inside the perimeter of the scene to guard against further casualties, either from contamination by an agent released or the possibility that additional CBRNE or secondary devices targeting emergency responders are present. "In-place sheltering" may be required if the area must be contained because of the need for quarantine or if it is determined to be safer for individuals to remain in place.

Authority for an evacuation lies with the Principal Executive Office of a jurisdiction (<u>10-3-406, MCA</u>). This means the mayors of Helena and East Helena and the county commissioners for the remainder of the county.

The law allows the Principal Executive Office to "direct and compel the evacuation of all or part of the population from and emergency or disaster area, within that political subdivision when necessary for the preservation of life or other disaster mitigation, response or recovery; and to control the ingress and egress to and from an emergency or disaster area, the movement of persons within the area, and the occupancy of premises therein".

Warning and evacuating the disabled will depend on locating them through emergency response agencies, neighbors, friend and relatives. Evacuation would be made through available busses, such as Treasure State, the City of Helena and Rocky Mountain Development Corp. to provide transportation with lifts. (*More evacuation information is provided in the County EOP "Population Protection Annex"*).

<u>Shelter-In-Place</u> information can be found in Section IV: Resources and Information. As with any emergency, State and local elected officials must be involved in making many protective action decisions.

6. Mass Care.

The location of mass care facilities will be based partly on the hazard agent involved. Emergency Decontamination may need to precede sheltering and other needs of the victims to prevent further damage from the hazard agent, either to the victims themselves or to the care providers. Coordination for mass care will be handled in the EOC in accordance with the Mass Casualty Incident Annex of the EOP. Currently both the Ft. Harrison Veteran's Hospital and St. Peter's Hospital have plans in place for mass care. A "mid-point" or intermediary station may be needed to move victims out of the way of immediate harm. This would allow responders to provide critical attention (e.g., decontamination and medical services) and general lifesaving support, then evacuate victims to a mass care location for further attention. General issues to consider for mass care are:

- a) Location, setup, and equipment for decontamination stations.
- b) Mobile triage support and qualified personnel.
- c) Supplies and personnel to support in-place sheltering.
- d) Evacuation to an intermediary location to provide decontamination and medical attention.
- e) Determination of safety perimeters (based on agent).

7. Health and Medical.

The County EOP already contains Annexes for Public Health Services and Emergency Support Services. Issues that may be different during a CBRNE incident include decontamination, safety of victims and responders, in-place sheltering versus evacuation, and multihazard/multiagent triage. Local agency tactical planning should anticipate the need to handle large numbers of people who may or may not be contaminated and who are fearful about their medical well-being. Additionally, Mental Health and Critical Incident Stress Management teams will be needed to assist responders and victims with the physiological traumas of dealing with a mass casualty incident.

The response to a bioterrorism incident will require the active collaboration of the clinicians and local public health authorities responsible for disease monitoring and outbreak investigation. Public Health response to a bioterrorism incident is outlined in the Lewis and Clark Public Health Services Annex to the EOP (*link*).

8. Resources Management.

All resources will be managed by the County EOC in support of the Incident Commander. If the incident is large enough to cause the activation of the State EOC, and particularly if the FBI implements a Joint Operations Center (JOC), resource management will be coordinated between the Operations Centers by the Logistics Sections of each center in accordance with established laws, protocols and interjurisdictional agreements as discussed in the County EOP. (For more information, see <u>Section II: Logistics</u>.)

Organization And Assignment Of Responsibilities

The effects of a terrorist act involving a WMD or a large scale HazMat incident have the potential to overwhelm local resources, which may require assistance from State or Federal governments. And, as with any hazard-specific emergency, the organization for management of local response may vary for a WMD incident. The Incident Management System will be used to facilitate the local response to any terrorist or HazMat incident and is outlined in more detail in Section II. A brief overview of response roles and responsibilities follows, (For more on agency roles and responsibilities, see this Link.)

1. Local Emergency Responders

Local fire departments, law enforcement personnel, HazMat teams, and EMS will be among the first to respond to a CBRNE incident. As response efforts escalate, the County EOC and Public Health Department will help coordinate needed services. Requests for Mutual Aid will be made in accordance with established agreements. Local responders must be prepared to manage an incident for up to 72 hours while waiting for state and federal assistance.

Primary Objectives.

- Protect the lives and safety of the citizens and first responders;
- Isolate, contain, and/or limit the spread of any CBRNE devices;
- Identify the type of agent/devices used;
- Identify and establish control zones for the suspected agent used;
- Ensure emergency responders properly follow protocol and have appropriate protective gear;
- Identify the most appropriate decontamination and/or treatment for victims;
- Establish victim services;

- Notify emergency personnel, including medical facilities, of dangers and anticipated casualties and proper measures to be followed;
- Notify appropriate State and Federal agencies;
- Provide accurate and timely public information;
- Preserve as much evidence as possible to aid in the investigation process;
- Protect critical infrastructure;
- Fatality management;
- Develop and enhance medical EMS; and
- Protect property and environment.

2. State Emergency Responders

If requested by local officials, the Montana Disaster & Emergency Services (DES) has capabilities to support local emergency management authorities and the Incident Commander (IC). Requests for State DES assistance must be made through the local DES Coordinator.

3. Local Emergency Planning Committees (LEPCs), State Emergency Response Commissions (SERCs), and Tribal Emergency Response Commissions (TERCs)

These entities are established under the <u>Superfund Amendments and Reauthorization Act of 1986</u> (SARA) Title III (also called <u>EPCRA</u>) and the implementing regulations of the Environmental Protection Agency (EPA). LEPCs develop and maintain local hazardous material emergency plans and receive notifications of releases of hazardous substances. SERCs and TERCs supervise the operation of the LEPCs and administer the community right-to-know provisions of SARA Title III, including collection and distribution of information about facility inventories of hazardous substances, chemicals, and toxins. The Lewis and Clark County DES Coordinator chairs the County LEPC and has detailed information about industrial chemicals within the community.

4. Federal Emergency Responders.

Upon determination of a credible terrorist threat, or if such an incident actually occurs, the Federal government may respond through the appropriate departments and agencies. These departments and agencies may include FEMA, the Department of Justice (DOJ) and FBI, the Department of Defense (DoD), the Department of Energy (DOE), the Department of Health and Human Services (HHS), the EPA, the Department of Agriculture (USDA), the Nuclear Regulatory Commission (NRC), and possibly the American Red Cross and Department of Veterans Affairs. The roles and responsibilities for Federal departments and agencies participating in both crisis management and consequence management are discussed in more detail in Section IV and in the Federal Response Plan.

Primary Duties. Upon determining that a terrorist incident is credible, the FBI Special Agent in Charge (SAC), through the FBI Headquarters, will initiate liaison with other Federal agencies to activate their operations centers. FEMA may activate a Regional Operations Center (ROC) and deploy a representative(s) to the affected area(s). If FEMA activates a ROC, it will notify the responsible FBI Field Office(s) to request a liaison. If the FBI activates the Strategic Information and Operations Center (SIOC) at FBI Headquarters, then other Federal agencies, including FEMA, will deploy a representative(s) to the SIOC, as required. Once the FBI has determined the need to activate a Joint Operations Center (JOC) to support the incident site, Federal, State, and local agencies may be requested by FEMA to support the Consequence Management Group located at the JOC.

Administration And Logistics

There are many factors that make response to a CBRNE/terrorist incident unique. Unlike some natural disasters (e.g., earthquakes, floods, winter storms, wildfires, etc.), the administration and logistics needs for response to a CBRNE incident require special considerations. For example, there may be little or no forewarning, immediately obvious indicators, or CBRNE knowledge (lead time) available to officials and citizens. Because the release of a CBRNE agent may not be immediately apparent, caregivers, emergency response personnel, and first responders are in imminent danger themselves of becoming casualties before the actual identification of the crime can be made. Incidents could escalate quickly from one scene to multiple locations and jurisdictions. It is important then, that each response agency have their own agency-specific SOP's and plans to deal with such things as loss of key personnel, personal protective equipment (PPE) needs, overtime costs, etc.

In accordance with the County EOP Basic Plan, Section B-2, Part IX:

Each department or organization included in this plan is responsible for providing the necessary administrative support for their personnel during disaster operations. Consideration should include the provision of equipment, supplies, transportation, meals and lodging. When the EOC is activated, the DES Coordinator is responsible for obtaining supplies for the EOC.

Each department is responsible for maintaining adequate records of personnel costs in excess of normal operations. Extra costs, such as overtime, must be documented, if reimbursement is requested from either Montana's Disaster Fund or from the federal government in a Presidential Disaster Declaration.

Mutual Aid Agreements

Mutual Aid Agreements do exist between fire and law enforcement agencies in the county. Public Works Departments in Helena, East Helena and the county have assisted each other in the past and plan to continue to do so. Formal agreements between the Emergency Operations Center and fixed hazardous material sites do not exist, but the facility managers have agreed to make their resources available to the community under Title III of SARA. Local fire jurisdictions have established mutual aid agreements and a Helena Valley Mutual Aid Operations Plan through the Lewis and Clark County Rural Fire Council.

More information on administration and logistics is given in Sections II and III of this plan.

Training

Testing the Plan:

- 1. An evaluated exercise should be held at least annually to test this plan or portions of this plan. Lessons learned will result in the revision of this plan.
- 2. The testing of the plan will be coordinated between the County DES coordinator, local law enforcement, local fire services, and any other agencies with an active or supportive role to include private industry.

Training Requirements:

- Level I (Awareness) Law Enforcement, EMS, & Public Works
- Level I & II (Operations) Fire, Special Response Teams (HazMat, EOD, SWAT)