



***Office of Spill Prevention and Response  
Objectives and Guidelines for  
Unannounced Drills Testing  
Spill Management Team  
Capability Through  
Vessel & Facility  
Marine Oil Spill Contingency Plans***

California Department of Fish and Wildlife  
Office of Spill Prevention and Response (OSPR)

## **INTRODUCTION**

The purpose of this document is to outline the scope and nature of the Office of Spill Prevention and Response's (OSPR) unannounced drill program for Plan Holders. It also provides an overview of drill processes and the objectives used to evaluate marine oil pollution response procedures contained in approved oil spill contingency plans.

Title 14, California Code of Regulations, Section 820.01, states in part, "The Administrator may call a drill or exercise, or conduct an inspection, to validate all or part of a contingency plan. This drill, exercise, or inspection may be announced or unannounced" and "a tabletop exercise, announced or unannounced, of the spill management team(s) shall be conducted annually; and the tabletop exercises must evaluate the spill management team(s) knowledge of the oil spill response plan. [14 CCR §§820.01(a)(1)(A), (2)(A); 827.02(e); 820.01(f)(8)(A)]

Unannounced drills will be coordinated and conducted by the OSPR with the support of other federal, state, and local government entities as necessary.

Plan Holders must identify a Spill Management Team (SMT) in their marine oil spill contingency plan. [14 CCR §§817.02(a)(4), 817.03(a)(4), 818.02(a)(4), 818.03(a)(4), 827.02(j)] And the contingency plan must describe the organization of the spill response system and management team. [14 CCR §§817.02(f)(1), 817.03(f), 818.02(g)(1), 818.03(g), 827.02(j)]

## **UNANNOUNCED DRILL GOAL AND PREP OBJECTIVES**

The goal of unannounced drills held under these guidelines is for Plan Holders to demonstrate their ability to staff an organizational structure of appropriate size for spill response, referred to as a SMT. The SMT personnel may be in-house employees of the plan holder, or the plan holder may contract for SMT services. The drill will be in a tabletop setting, with role playing as it would occur in an actual type III oil spill to accomplish specified drill objectives. The SMT must also be able to fully integrate into an Incident Command/Unified Command structure, in accordance with their plan holder's approved oil spill contingency plan and the National Contingency Plan.

**UNANNOUNCED DRILL OBJECTIVES**  
**PLAN HOLDER**  
**SPILL MANAGEMENT TEAM (SMT) CAPABILITY**  
*Initial Response Objectives*

(1) Notifications: Make actual notifications to the Plan Holder's Oil Spill Response Organization (OSRO), the Qualified Individual (QI), the SMT, the California Office of Emergency Services (Cal OES), the National Response Center (NRC), and as appropriate, local agencies (e.g. CUPA) and the Oiled Wildlife Care Network (OWCN). Notifications should be documented at the start of the exercise (820.01)(e)(1)).

(2) Staff Mobilization: Assemble the SMT and other personnel identified in the contingency plan; provide updated contact information (820.01)(e)(2)).

(3) Incident Command System: Organize the initial responders to operate under the framework of the Incident Command System (ICS), as outlined in the U.S. Coast Guard and/or U.S. Environmental Protection Agency's Incident Management Handbook. This shall include implementation of the initial response phase of the operational planning cycle (Planning "P"). Facilitate an Incident Briefing, led by the Plan Holder Incident Commander based on ICS Form 201, and, as appropriate, conduct Unified Command Meetings to discuss important issues and/or key decisions (820.01)(e)(3)).

(4) Safety: Conduct an initial site safety assessment/job safety analysis, identify hazards using the Safety Data Sheet (SDS), and conduct a safety briefing (820.01)(e)(8.8)).

(5) Operations: Coordinate and manage field operations with Plan Holder owned resources and/or an OSRO on-site, in accordance with initial Incident Commander (IC) objectives and priorities (820.01)(e)(8)).

(6) Planning: Collect, organize, and display basic information about the current status of the spill, including status and location of all incident resources and environmental data (e.g., weather, tides, currents and potential resources at risk). Develop strategies and tactics based on the initial objectives and priorities, for inclusion in an ICS 201 Form (820.01)(e)(9)).

## GENERAL GUIDELINES FOR UNANNOUNCED DRILLS

All state, federal, and local costs incurred in conjunction with participation in the exercise will be borne by each respective agency. **All other costs will be the responsibility of the plan holder.**

Drill play will be conducted in 8 hours or less and is intended to assess the initial response phase as outlined in Chapter 3 U.S. Coast Guard's *Incident Management Handbook*.

Control of the drill will be the responsibility of the designated OSPR Unannounced Drill Coordinator (Drill Coordinator).

The scenario will be a type III or larger incident, and will address spill location, amount spilled, and product spilled.

OSRO equipment, such as booming and on-water recovery, will not be deployed during the unannounced drill. However, for those objectives that require OSRO participation, the Incident Command/Unified Command must contact the OSRO.

Injects may be used and will be provided by the Drill C. All injects posed to the SMT will be based on the plan holder's oil spill contingency plan for that vessel or facility and the relevant Area Contingency Plan.

## SEQUENCE OF EVENTS FOR NOTIFICATION AND TABLETOP EXERCISE

- Drill begins by OSPR Drill Coordinator visiting the vessel or facility and presenting a scenario to the Master/Person-In-Charge (PIC).
- Master, PIC, or QI will make all required notifications. This will also include contacting the SMT.
- The SMT will be instructed to contact the OSPR Unannounced Drill Coordinator, whose number will be provided when the spill drill scenario is read. Once communication is established with the SMT, the designated Responsible Party Incident commander (RP-IC) or QI will be read the scenario.
- While enroute and once on-site, the RP-IC will begin to establish, direct, and manage the initial response to the simulated incident until all objectives have been accomplished or drill is deemed secured by the OSPR drill coordinator.

## **ASSESSMENT**

Each initial response objective met by the SMT participants will be documented. The SMT must make every effort to manage the simulated incident and to demonstrate they have the ability to effectively meet each objective.

The Administrator will provide the participating Plan Holder with a drill assessment report within twenty (20) business days of the drill's conclusion.

Plan Holders may request credit to fulfill some of the exercise objective requirements of Section 820.01(e).

## **QUESTIONS**

Questions about these guidelines or the OSPR Drills and Exercise program may be directed to Joe Stewart at (916) 324-0173 or email [joe.stewart@wildlife.ca.gov](mailto:joe.stewart@wildlife.ca.gov).