

Objective and Guidelines  
for  
Unannounced Drills  
with

California Oil Spill  
Response Organization



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

## **INTRODUCTION**

This document outlines the scope and nature of the Office of Spill Prevention and Response's (OSPR) unannounced drill program for OSRO's requesting vessel service ratings. The services rated include containment booming, on-water recovery/storage, and shoreline protection. Although the preference is to drill all services simultaneously, there may be times when services are tested separately. This document provides an overview of drill processes and the criteria used to evaluate an Oil Spill Response Organization's (OSRO's) response procedures contained in their approved rating application on file.

Ratings of six hours or earlier require dedicated response resources or OSRO owned and controlled resources with the exception of shoreline protection as outlined in California Code of Regulations section 818.02 Government Code 8670.30(c) states "The Administrator shall not issue a rating until the applicant OSRO has completes an unannounced drill." The drill shall test the resources and response capabilities of the OSRO, including, but not limited to, on water containment and recovery, environmentally sensitive habitat protection, and storage. Unannounced drills will be coordinated and conducted by OSPR with the support of other federal, state, and local government entities as necessary.

### **UNANNOUNCED DRILL OBJECTIVE**

The objective of unannounced drills is to demonstrate the OSRO's ability to deploy resources in accordance with their rating application during the first six hours immediately following a simulated spill. OSRO's will be granted a rating for each service successfully completed.

### **UNANNOUNCED DRILL GUIDELINES**

Anyone may stop the drill for safety reasons. Once stopped, only the Drill Coordinator may restart the drill.

The timeframes for equipment delivery and deployment are specified in this document and do not take into account the time required to conduct a health and safety assessment. In addition, these timeframes do not account for delays that may occur due to weather or sea state. The actual time necessary to deliver and deploy equipment will be assessed at the time of a drill and will take into account the prevailing conditions of weather and sea state, as well as the site assessment requirements.

The scenarios will be designed by OSPR and control of the drill will be the responsibility of the designated OSPR Drill Coordinator

Outside agencies affected by the unannounced drill will be contacted by the Drill Coordinator.

Drill activities may occur during transfers if it is deemed safe by the OSPR Drill Coordinator, but will be planned to minimize interruptions of oil or cargo transfer operations.

All State, Federal, and local agency 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 OSRO.

The granting of a temporary Small Harbor Rating for shoreline protection to cover a vessel for a specific project will not require the OSRO to conduct an actual equipment deployment. DFG/OSPR personnel or representative will conduct site and equipment inspections to ensure all response resources listed will meet the required timeframes.

Skimming systems - Adequate storage must be provided for all skimmers deployed.

Boats and personnel - Adequate amounts of personnel and boats must be employed for on-water activities.

All equipment will be required to demonstrate its operability. Credit for equipment that is inoperable will not be granted.

If the Administrator is provided advance notice, OSPR will not conduct drills while OSROs are conducting regular scheduled oil spill related training. This training must not affect the OSRO's ability to meet the regulatory requirements of any oil spill contingency plan holders. The Administrator must receive the notice at least 72 hours in advance of oil spill related training; otherwise, the OSRO will be expected to fully comply and perform with all drill objectives.

### **Application, Narrative, and Unannounced Drill**

In order to obtain a service rating, an OSRO must first submit an application to OSPR Title 14 CCR section 819.02). Within this application, the OSRO shall provide a written narrative for any service(s) they are requesting a rating. This narrative shall outline how the OSRO will deploy response resources within the required time frames for all services for the first six hours. No unannounced drills will be conducted before the

review of the narrative is completed. Upon completion of the narrative review, OSPR will begin the unannounced drill by notifying the OSRO directly. OSRO's will respond to the simulated oil spill with all necessary response resources it has applied for, up to the six hour requirement.

### **Narrative (announced portion)**

A written plan of operations, including call-out list, for each GRP or Geographic Region (ACP area if GRP's are not established), and operating environment of response coverage. The written plan of operations can be limited to the following time frames: six hours for High Volume Ports; 12 hours for Facility/Transfer Areas; and 18 hours for the Balance of the Coast. However, a written general plan to acquire response resources beyond these time frames is still required. The plan will describe the number(s), types, means of deployment, and operations of all oil spill response equipment and trained personnel, including subcontracted resources that the applicant would use for: 50 barrel, 3,125 barrels, and the largest reasonable worst case spill for which the applicant would be contractually responsible (see 819.03(d)(2)).

OSRO's requesting all service ratings shall not duplicate any resource used in another service until that resource has completed its initial tasking. Plans shall also clearly define dedicated and non-dedicated resources being used. OSRO's must also be able to show that they are capable of cascading in large amounts of boom to cover the tables. Equipment lists found in the current application on file with OSPR will be used to audit these narratives prior to the unannounced drill.

### **Initiation of the Drill**

Upon notification, an OSRO requesting a rating shall begin by conducting a safety brief, develop site safety plan, and begin deploying all containment booming and on-water recovery response resources.

Only sensitive sites that would be impacted within the first six hours after the drill commences will be required to have resources brought to the scene as described in the Shoreline Protection Tables.

Shoreline protection resources shall be staged at the site to be protected or staged in areas necessary to facilitate the rapid deployment of boats and boom to sensitive sites. Boom shall be made ready to deploy, but may not necessarily be deployed. Boom staged in areas where timely deployment to a site is questionable may result in being brought to the vicinity of the sensitive site. Review and discussion of the OSRO's narrative will alleviate most needs to deploy boom to those sites. "Made ready" is defined as boat(s) in water, lines connected to boom and made fast to the boat.

## Containment Boom, On-water recover, and Storage Tables

		<b>Tank Vessels</b>		
<b>On-scene Times</b>		2 hour	4 hours	6 hours
<b>High Volume Ports</b>	On-water Recovery	3,125	13,280	23,437
<b>Oil Pollution Risk Area (OPRA)</b>	Containment Booming (ft)	2,000		
<b>Facility Transfer Areas &amp; Santa Barbara Channel</b>	On-water Recovery	3,125		6,250
<b>Balance of the Coast</b>	On-water Recovery	3,125		3,750
	Storage	Storage Sufficient storage to support the actual skimming activities shall be brought to the scene	520 bbl/day	12,000 bbl/day

## Nontank Vessels

On-scene Times		2 hour	4 hours	6 hours
<b>High Volume Ports</b>	On-water Recovery (bbls)	2500 bbls or 10% whichever is less	Reasonable Worst Case Spill (RWCS)	
<b>Oil Pollution Risk Area (OPRA)</b>	Containment			
	Booming (ft)	2,000		
<b>-Facility Transfer Areas &amp; Santa Barbara Channel -Ports of Stockton and Sacramento</b>		2500 bbls or 10% whichever is less		RWCS
<b>Balance of the Coast</b>		2500 bbls or 10% whichever is less		
	Storage	Storage Sufficient storage to support the actual skimming activities shall be brought to the scene	520 bbl/day	12,000 bbl/day

<b>Geographic Region (also known as ACP Area)</b>	<b>% DEDICATED RESOURCES FOR SHORELINE PROTECTION</b>
<b>1</b>	<b>50% dedicated boats and staff</b>
<b>2</b>	<b>75% dedicated boats and staff</b>
<b>3</b>	<b>0% (non-dedicated boats and staff allowed)</b>
<b>4</b>	<b>0% (non-dedicated boats and staff allowed)</b>
	<b>*For Port Hueneme only, 75% dedicated boats and staff required</b>
<b>5</b>	<b>75% dedicated boats and staff</b>
<b>6</b>	<b>50% dedicated boats and staff</b>

### **GRANTING RATINGS**

OSRO will only be drilled on the shoreline protection ratings/on-water recovery and storage they apply for. Ratings applied for and not obtained during an unannounced drill will not affect other later ratings if successfully completed. Earlier ratings not obtained during a specific unannounced drill can be reapplied for.

### **EVALUATION**

Containment, On-water recovery/storage, and shoreline protection ratings will be granted on successful completion of the narrative and unannounced drill.

Credit will be given for the deployment of OSRO boom, skimmers, vessels, etc.

The Administrator will provide the participating OSRO's with a drill evaluation report within thirty business days of the drill's conclusion.