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Office of Spill Prevention and Response (OSPR) Preparedness Bulletin: Tips for Exercise Compliance

Dear Plan Holders, Consultants, and Contractors:

I wanted to share some insights to help promote compliance with the Office of Spill Prevention and Response's (OSPR) exercise programs. As you are aware, Title 14 California Code of Regulations (CCR) § 820.1 and § 830.1 through 830.11 establish objectives that plan holders and/or spill management teams (SMTs) must meet on specific timelines as defined in each regulation. In this bulletin, we highlight objectives that have been challenging for plan holders and SMTs, along with recommendations for their successful achievement. We also include best practices that, if implemented, will help to increase plan holder and SMT success at an exercise.

Title 14 CCR § 820.1 – Drills and Exercises (D&E) Program

Tabletop Exercise Objectives

§ 820.1(c)(7.1) Source Control - Locate the source of the spill and initiate emergency shutdown procedures as described in the oil spill contingency plan. Source control and associated actions must be documented on page two of the ICS 201.

- If the scenario includes an immediate total loss of product, emergency response procedures being initiated, or the source having been secured/controlled, then the plan holder cannot earn credit for this objective.

§ 820.1(c)(7.2) Assessment - Provide an initial estimate of the volume spilled, extent of the spill, and develop an initial trajectory. Calculate the actual spill volume, make a telephonic update to the California Office of Emergency Services State Warning Center, and document both on page two of the ICS 201.

- If the scenario includes an immediate total loss of product or of the actual (i.e., total) spill volume, then plan holders cannot achieve credit for this objective.
- In addition to documenting the calculation, it is highly recommended that plan holders also document the methodology used to obtain the calculation.

§ 820.1(c)(8) Planning Section - Designate a Planning Section Chief to oversee plan development based on Unified Command objectives and track plan status. Plans must be submitted for Unified Command approval to develop the Incident Action Plan. The Planning Section Chief must implement the operational planning cycle and facilitate meetings following the agendas described in the U.S. Coast Guard or U.S. Environmental Protection Agency *Incident Management Handbook*.

- This objective requires that a minimum of two plans be submitted for UC approval during the exercise. ICS forms with the word “plan” on them do not count towards this requirement, as it simply refers to the name of the form.
- Acceptable plans include, but are not limited to: Site Safety Plan, Waste Management Plan, Decontamination Plan, Traffic Plan, Security Plan, etc.

§ 820.1(c)(8.5) Volunteer Unit - Designate staff to engage with the Volunteer Coordinator from the Office of Spill Prevention and Response and establish a Volunteer Unit. Obtain the approved Non-Wildlife Volunteer Plan from the relevant area contingency plans or geographic response plans. Develop messaging to be incorporated with written media products, when applicable. Keep Unified Command briefed on Volunteer Unit actions.

- During exercise planning and scenario development, it is important that oil impacts or threatens publicly accessible places to provide an opportunity for plan holder staff to engage with OSPR's Volunteer Coordinator in the Volunteer Unit.

For more information on OSPR's Drills and Exercise Program, please check our website, including our Frequently Asked Questions: <https://wildlife.ca.gov/OSPR/Drills-Exercises>.

Title 14 CCR § 830.1 – 830.11 – Spill Management Team Certification

Certification Exercise Participation and Criteria

- Active Participation. Signing into the exercise does not guarantee credit for the exercise. SMT personnel must actively engage and participate during the exercise by performing their responsibilities in accordance with the incident-specific policies and procedures established by the Unified Command.
- Major Responsibilities. Personnel must independently demonstrate the major responsibilities associated with their incident command system (ICS) positions.

- Single Event. All objectives must be successfully completed at a single spill or certification exercise in California.
- Scenario Spill Volume. The scenario must involve a response to a spill or imminently threatened spill of the largest reasonable worst-case spill (RWCS) volume listed in contingency plans for which the SMT will provide services, or a maximum of 31,250 barrels.

Certification Exercise Objectives

§ 830.6(b)(1)(B) Public Health – Consider threats to public health. Engage with the appropriate agencies and/or technical specialists and provide them with timely updates about the spilled product, potential volume, source control, containment, and any developments potentially impacting community exposure to air contaminants as a consequence of the incident. Provide support for air monitoring and sampling, such as equipment and personnel used in the conduct of monitoring and sampling activities, using health-protective exposure levels for communities and sensitive receptors, such as the Acute and 8- hour Reference Exposure Levels established by the California Office of Environmental Health Hazard Assessment.

- SMTs must engage with the appropriate agencies and/or technical specialists as it relates to assessing impacts to public health due to the incident. Contact with agencies and/or technical specialists prior to the date of the certification exercise will not count toward this objective.
- SMTs must provide support for air monitoring and sampling that is specific to the incident and product spilled.
- Example deliverables: Community Air Monitoring Plan referencing health protective levels, identification of areas to be covered by air monitoring/sampling, ICS 213RR for air monitoring equipment and personnel

§ 830.6(b)(2)(A) SMT Staffing – Identify and begin to staff incident command system functions, positions, and technical specialists as necessary to manage the spill response effectively.

- SMT staffing for the certification exercise must align with the current approved application. For example, personnel for each position listed on the approved application (initial and cascading, as appropriate) will be at the exercise to participate. This includes external providers listed on the approved application.

§ 830.6(b)(2)(C) Transfer of Command – Develop and prepare to implement a plan for transfer of command and inform assigned personnel and agencies of the planned transition time.

- Transfers of ICS positions from the initial to cascading personnel must be documented and announced at the exercise, as appropriate to each SMT's approved application.
- Outgoing staff must brief their replacements, and briefings must be documented (e.g., ICS-214a). Additional documentation such as organizational charts must be updated as appropriate to reflect the transfer.

§ 830.6(b)(3)(B) Data Sharing and Common Operating Picture – Set up a common operating picture, which shall be posted (e.g., situation status board) at the incident command post or virtually, to display situational, environmental, and other specialized data. Additionally, provide either on-site physical storage media or server-based online data storage, with backup for all spatial data created for the response. Data, including the common operating picture, shall be stored in a format that is fully, equally, and simultaneously accessible to representatives of the incident commanders.

- To verify this capability, the SMT coordinator will request spatial data to be uploaded via OSPR's FTP server during the exercise. Spatial data must be provided upon request and before the conclusion of the exercise.
- PDFs and screenshots of spatial data will not be accepted. OSPR will accept any standard geospatial file format, but (.shp), (.kml), or (.kmz) formats are preferred.

For more information on OSPR's SMT Program, please check our website:

<https://wildlife.ca.gov/OSPR/RCPU/Spill-Management-Teams>

Best Practices

- We have observed that it is beneficial to have a plan holder representative dedicated to performing an internal evaluation of the required objective verbiage to ensure compliance.
- Provide all exercise participants with the objective(s) associated with their position so their work requirements and expectations are clear. Personnel staffing the certified SMT must have knowledge and understanding of the objectives and deliverables. Position-specific training and ICS refreshers for exercise participants are highly recommended.
- Maximize the value of planning meetings. These meetings should provide critical information to inform exercise design such as detailed scenario information, exercise logistics, and staffing requests. Come to planning meetings prepared to ask clarifying questions about objectives, regulations, and exercise expectations.
- Ensure that the scenario, scope, and staffing are sufficient to test and successfully achieve specific planned objectives during exercise play. For example, information

provided in the scenario may make certain objectives ineligible for credit (see Source Control and Assessment objectives).

- The SMT regulations and the National Preparedness for Response Exercise Program (NPREP) require a scenario involving a spill of the RWCS / Worst Case Discharge (WCD) volume, but OSPR's plan holder exercise regulations require a scenario for which the source can be controlled and spill amount assessed. To successfully meet the SMT RWCS volume requirement while also meeting the Source Control and Assessment objectives in § 820.1, we recommend that the scenario not include an instantaneous release of product. This will allow opportunities to conduct source control and assessment actions while meeting the SMT requirement for the volume at threat of spilling.
- It is best to test the Resource Unit, Logistics Section, and Finance Section objectives during the same exercise, since their roles are interconnected. It may also be beneficial to test Personnel Support at the same exercise because it is closely related to work completed by these objectives.
- It is best to test the Public Information Officer, Liaison Officer, and Volunteer Unit objectives during the same exercise since they work so closely together.
- Be cognizant of the 3-year cycles for the SMT and D&E program requirements. For the D&E program it is highly recommended to minimize the mandatory objectives for each year, which allows for more flexibility with exercise planning and design. This cycle can also be used to deconflict between different program requirements.
- Ensure all documentation supporting the requested objectives is included with the credit request submission and that all images provided are clear enough to read. We recommend doing a quality control check of the documentation package to ensure legibility and completeness of the credit request package. Don't forget to include lessons learned with every credit request!

I hope that you find this information useful. Please do not hesitate to reach out with any questions.

Respectfully,



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