



***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 criteria 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."

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 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)]

A tabletop exercise, announced or unannounced, of the spill management team(s) must 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 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 spill management team (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, the National Contingency Plan.

The following U.S. Coast Guard *National Preparedness for Response Exercise Program* (PREP) objectives will be used.

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

- 1) Take initial response actions, including timely required notifications (Qualified Individual (QI), Oil Spill Response Organization (OSRO), Spill Management Team (SMT), state and federal agencies, etc.). Report updated volume of spill, as necessary. (PREP Objective 1)
- 2) Use of a recognized incident command structure, such as that described in the U.S. Coast Guard's *Incident Management Handbook*. [14 CCR 817.02(f), 817.03(f), 818.02(g), 818.03(g), 820.01(a), 827.02(j)]
- 3) Coordinate initial response efforts with the Federal On-Scene Coordinator and State On-Scene Coordinator, while en-route to the agreed upon Command Post; set up a schedule for periodic situation updates. (PREP Objective 2, 10)
- 4) Arrival of the Responsible Party's Incident Commander (RP-IC) at a designated location or command post as identified in the scenario, to establish or integrate into a Unified Command (UC). If managing the incident remotely, establish and document clear and continuous communication with UC. (PREP Objective 2, 3.1.4, 10)
- 5) Conduct an Incident Briefing using an ICS 201 Incident Briefing form. Communicate where, when, how, and what happened, what is happening now, what is going to happen, critical action items, and incident potential. Maintain the ICS 201 form throughout the drill. (PREP Objective 3.2.1, 10, 15, CA2)
- 6) Simulate ordering and directing resources to contain the source, locate the leading edge of spill, develop initial oil trajectory and identify all sensitive sites that need to be protected by hour three (3) and later. Document all actions taken using ICS 201 and 214 Unit Log forms. (PREP Objectives 3.2.1, 3.2.3, 8, 10, 14.2, 15)
- 7) Prepare and attend Initial IC/UC meeting to provide the current operational picture. (PREP Objectives 3.1, 10)
- 8) Communicate to the Unified Command the chemical /physical hazards of spilled materials which pose a risk to responders or the public, (PREP Objectives 3.2.6, 10) and gather initial site safety and hazard information.

9) Attend Initial UC Objectives Meeting and initiate an ICS Form 202 Incident Objectives (next operational period), and ICS Form 233 Open action tracker, and ICS Form 209 Resource Summary. (PREP Objectives 2, 3.1, 10)

10) Brief State and Federal IC's with a report on the status of all Command and General Staff personnel en-route to command post. The report shall include the person's name, company, ICS position, and arrival times to the command post/designated location and contact information. (PREP Objectives 2, 3.2.3, 10, 11, 14.2)

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.

The scenario will be a Type 3 or larger incident, and will address spill location, amount spilled, product spilled, initial spill trajectory (fate and transport) and identify all environmentally sensitive sites potentially impacted.

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.

All injects will be provided by the drill coordinator and his/her team.

Questions/issues 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, QI, or PIC will make all required notifications. This will also include contacting the Spill Management Team (SMT).
- The SMT will be instructed to contact the OSPR Unannounced Drill Coordinator. The Drill Coordinators number will be provided to the Master when the spill drill scenario is read. If no contact is made by the SMT, the Drill Coordinator will use the SMT's twenty-four (24) hour number listed in the oil spill contingency plan to initiate contact.
- Once communication is established with the SMT, the designated Responsible Party Incident commander (RP-IC) /Qualified Individual (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.

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, SMT and OSRO 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 Mr. Christopher Klumpp at (916) 322-1195 or email cklumpp@ospr.dfg.ca.gov