NATIONAL PREPAREDNESS

FOR

RESPONSE EXERCISE PROGRAM

(PREP)

GUIDELINES

DEPARTMENT OF TRANSPORTATION
U.S. Coast Guard
Research and Special Programs Administration

ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF THE INTERIOR
Minerals Management Service

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To the “Response Community”:

This is the first revision since August 1994 to the Preparedness for Response Exercise Program (PREP) when we set out together to design an effective and coordinated exercise program under the Oil Pollution Act of 1990. As before, the revisions are the result of an open dialogue and the incorporation of lessons learned over the past 8 years. We considered issues identified in public meetings and in written comments received to the Department of Transportation regulatory docket (2000-7514). The PREP will evolve as the government and industry continue to meet the challenge of protecting the environment, public health and welfare. We look forward to working with all parties as we continue to improve the PREP process.

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PREP GUIDELINES

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SECTION 1: INTRODUCTION

Purpose

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable exercise program which meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311 (j) of the Federal Water Pollution Control Act (FWPCA), by adding a new subsection (6) and a new subsection (7) for spill response preparedness [33 U.S.C. 1321 (j)]. The PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the government and oil industry to adopt and sustain. The PREP is a unified federal effort and satisfies the exercise requirements of the Coast Guard, the Environmental Protection Agency (EPA), the Research and Special Programs Administration (RSPA) Office of Pipeline Safety, and the Minerals Management Service (MMS). Completion of the PREP exercises will satisfy all OPA 90 mandated federal oil pollution response exercise requirements.

PREP addresses the exercise requirements for oil pollution response. At this time, Coast Guard is the only one of the four participating federal agencies considering regulations requiring HAZSUB response planning and exercises under the Federal Water Pollution Control Act and the Oil Pollution Act of 1990. Therefore, the HAZSUB exercise standards described in Section 3 of the Guidelines apply only to CG-regulated vessels and facilities in accordance with 33 CFR 154/155. There are additional industry planning and exercise requirements contained in other federal statutes, which are not addressed in these Guidelines.

The PREP represents the **minimum** guidelines for ensuring adequate response preparedness. If personnel within an organization believe additional exercises or an expansion of the scope of the PREP exercises are warranted to ensure enhanced preparedness, they are **highly encouraged** to conduct these exercises.

The PREP exercises should be viewed as an opportunity for continuous improvement of the response plans and the response system. **Plan holders are responsible for addressing any issues that arise from evaluation of the exercises and for making changes to the response plans necessary to ensure the highest level of preparedness.**

Participation in PREP

Plan holders are required to meet the pollution response exercise requirements mandated by the federal agency with regulatory oversight for the specific type of industry involved (e.g., vessels, marine transportation-related facilities, onshore and certain offshore non transportation-related facilities, pipelines, offshore facilities). The PREP satisfies these requirements. **The PREP is a voluntary program**. Plan holders are not required to follow the PREP guidelines and, if they choose not to, may develop their own exercise program that complies with the regulatory exercise requirements.

All plan holders, whether participating in the PREP or following the exercise mandates of relevant agency regulations, will be subject to government -initiated unannounced exercises. Unannounced exercises are mandated by OPA 90. These exercises are further described in these guidelines.

Applicability

The PREP is applicable to all industry response plan holders who elect to follow these guidelines. Area Contingency Plan holders are required to follow the PREP guidelines.

Industry plan holders electing not to adopt the PREP as their exercise program will be responsible for developing and documenting an exercise program that satisfies the appropriate federal oversight agency.

If an industry plan holder has developed one response plan that covers a fleet of vessels or regional operations of offshore platforms, this plan holder would only be required to conduct one "set" of exercises for the plan, with the exception of the qualified individual notification exercises and the emergency procedures exercises, which are required for all manned vessels and unmanned barges (as specified in 33 CFR155.101 5).

Effective Date

THE PREP GUIDELINES BECAME EFFECTIVE JANUARY 1,1994. THE PREP FOLLOWS THE CALENDAR YEAR - THE EXERCISE YEAR IS JANUARY 1 TO DECEMBER 31.

Definitions

- **Area** - That geographic area for which a separate and distinct Area Contingency Plan has been prepared, as described in the Oil Pollution Act of 1990. For EPA Areas with sub - area plans or annexes to the Area Contingency Plan, the EPA Regional Administrator shall decide which sub-area plan is to be exercised within the triennial cycle.

- **Area Committee -** Area Committees are those committees comprised of federal, state and local officials, formed in accordance with section 4202 of the Oil Pollution Act of 1990, whose task is to prepare an Area Contingency Plan for the area for response to a discharge of oil or hazardous substance.

- **Area Spill Management Team -** The Area Spill Management Team is the group of individuals within the Coast Guard or EPA On-Scene Coordinator organization with responsibility for spill response management within the respective area. The Area Spill Management Team should include state and local personnel whenever possible.

- **Barge Custodian -** A barge custodian is the individual that has custody of an unmanned barge. The barge custodian may be affiliated with the towing vessel, fleeting area or facility at which the barge may be moored. The custodian can be the towing vessel operator, the facility operator, the fleet operator, or whoever may be in charge of the entity that has custody of the barge.

- **Certification -** Certification is the act of confirming that an exercise (1) was completed; (2) was conducted in accordance with the PREP guidelines, meeting all objectives listed; and (3) was evaluated using a mechanism that appraised the effectiveness of the response or contingency plan.

- **Complex -** A complex is a facility regulated under section 311 (j) of the Federal Water Pollution Control Act [33 U.S.C. 1321 (j)] by two or more federal agencies.

- **Equipment deployment exercise -** An equipment deployment exercise is an exercise where response equipment is deployed to a specific site and operated in its normal operating medium.

- **Equipment activation -** Equipment activation is the movement, staging, deployment or operation of response equipment, as determined by the plan holder in consultation with the exercise design team.

- **Exercise Design Team -** This team is comprised of federal, state and industry representatives who have responsibility for designing an Area Exercise.

⌑ **Hazardous Substance -** For the purposes of PREP Section 3, the chemicals for which plan holders are required to prepare response plans by the Coast Guard under 33 CFR 154, 155 .

⌑ **Hazardous Substance Response Organization (HSRO) -** For the purposes of PREP Section 3, HSRO refers to companies involved with hazardous substance response, removal, and remediation. This acronym does not suggest the same classification standards that are required by OSROs.

⌑ **Industry -** For the purpose of these guidelines, industry means the vessels, marine transportation-related (MTR) facilities, onshore and certain offshore non - transportation-related facilities, pipelines, and Outer Continental Shelf platforms for which response plans for oil spill response are required to be submitted by owners or operators. The response plan requirements and regulations for these entities are administered by the Coast Guard, EPA, RSPA, and MMS.

⌑ **National Response System -** Under 40 CFR part 300 (The National Oil and Hazardous Substances Pollution Contingency Plan), the National Response System (NRS) includes the National Response Team, Regional Response Teams, Area Committees, On-Scene Coordinators, and state and local government entities involved with response planning and coordination. The PREP, consistent with OPA 90 objectives, specifically involves the private sector with the NRS in order to ensure effective exercise development, delivery and coordination.

⌑ **Oil Spill Removal Organization (OSRO) -** An oil spill removal organization is an entity that provides response resources. An oil spill removal organization includes, but is not limited to, any for-profit or not-for-profit contractor, cooperative, or in-house response resources established in a geographic area to provide required response resources.

⌑ **On-Scene Coordinator (OSC) -** The On-Scene Coordinator is the federal official predesignated by EPA or the USCG prior to an oil spill to coordinate and direct federal responses under subpart D of the National Contingency Plan, or the official designated by the lead agency to coordinate and direct removal actions under subpart E of the National Contingency Plan.

⌑ **Operating Environments -** For the purposes of PREP, there are three types of operating environments [33 CFR 154, 33 CFR 155, 40 CFR 112]:

- River and canals

- Great Lakes/ Inland
- Ocean (nearshore, offshore, and open ocean)

If an OSRO operates in all three environments, the OSRO is required to conduct an exercise of the minimum amount of equipment in each of the environments. If the OSRO only operates in two of the environments, it must conduct the exercises in the two environments.

⌑ **Plan Holder -** The plan holder is the industry (e.g., vessels, MTR facilities, onshore and certain offshore non-transportation-related facilities, pipelines, or offshore facilities) for which a response plan is required by federal regulation to be submitted by a vessel or facility's owner or operator. If an owner or operator is authorized to prepare one plan for a fleet of vessels, that owner or operator is considered to be the plan holder.

Planning Volumes for Oil :

1. **Average Most Probable (USCG) / Small (EPA) Discharge: -** This definition is agency-dependent, and the appropriate definitions are detailed as follows:

    - For Coast Guard-regulated vessels, a discharge of 50 barrels [2,100 gallons] of oil from the vessel during oil transfer operations [33 CFR 155.1020].
    - For Coast Guard-regulated facilities, a discharge of the lesser of 50 barrels [2,100 gallons] or 1 percent of the volume of the worst-case discharge [33 CFR 154.1020].
    - For EPA regulated facilities, a small discharge is a volume of 2,100 gallons [50 barrels]or less, provided this amount is less than the worst-case discharge [40 CFR 112.20].
    - For RSPA - Not applicable
    - For MMS - Not applicable

2. **Maximum Most Probable (USCG) / Medium (EPA) Discharge: -** This definition is agency-dependent, and the appropriate definitions are detailed as follows:

- For Coast Guard-regulated vessels, a discharge of 2,500 barrels [105,000 gallons] of oil for vessels with an oil cargo capacity equal to or greater than 25,000 barrels [1,050,000 gallons], or 10 percent of the vessel's oil cargo capacity for vessels with a capacity of less than 25,000 barrels [1,050,000 gallons] [33 CFR 155.1020].

- For Coast Guard-regulated facilities, a discharge of the lesser or 1,200 barrels [50,400 gallons]or 10 percent of the volume of a worst-case discharge [33 CFR 154.1020].

- For EPA-regulated facilities, a discharge greater than 2,100 gallons [50 barrels] and less than or equal to 36,000 gallons [858 barrels] or 10 percent of the capacity of the largest tank at the facility, whichever is less [40 CFR 112.20].

- For RSPA-Not applicable.

- For MMS-Not applicable.

***Although this type of spill is not included as a spill to be used in any of the exercises, the definition is included to remind the program participants that this spill type is included in the planning process and can be used when conducting the various exercises.**

3. **Worst Case Discharge -** This definition is agency-dependent, and the appropriate definitions are detailed as follows:

- For Coast Guard-regulated vessels, a discharge in adverse weather conditions of a vessel's entire cargo as defined in 33 CFR 155.1020.

- For Coast Guard-regulated facilities, the size of the discharge as defined in 33 CFR 154.1020 (in the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions meeting the requirements of 33 CFR 154.1029).

- For EPA-regulated facilities, the size of the discharge described in 40 CFR 112.20.

- For RSPA-regulated pipelines, the size of the discharge as defined in applicable regulations [49 CFR 194].

- For MMS-regulated offshore facilities, the size of the discharge as defined in applicable regulations [30 CFR 254].

- For Areas, the size of the discharge as defined in the Area Contingency Plan.

- For complexes regulated by more than one federal agency, the largest of the worst-case discharges calculated for the various regulated components.

- Planning Volumes for HAZSUB – Applies to Section 3 only.

4. **Worst Case Discharge (vessel)** - means a discharge of a vessel's entire hazardous substance cargo during adverse weather conditions [33 CFR 155. 3030].In addition, planning contingencies should also anticipate situations where a vessel does not lose the entire cargo but the consequences of the release present a significant and substantial risk to human health or the environment. Furthermore, a company must be prepared to respond to any individual chemical it is authorized to carry.

5. **Worst Case Discharge (Coast Guard-regulated facility)** – means a discharge of the entire volume of the largest hazardous substance cargo line (including the content of any associated breakout tanks) measured from the transfer manifold on the dock to the first valve inside the secondary containment of the facility.

⌑ **Personal Protective Equipment** - equipment that meets the requirements contained in OSHA Hazardous Waste Regulations 29 CFR 1910.120.

⌑ **Primary Oversight Agency -** The primary oversight agency is the agency with regulatory authority over a particular industry. For the purposes of the PREP, the four primary oversight agencies and the industries they regulate are the U.S. Coast Guard (vessels, MTR facilities), the Environmental Protection Agency (onshore and certain offshore non transportation-related facilities), the Research and Special Programs Administration (pipelines), and the Minerals Management Service (offshore facilities).

⌑ **Qualified Individual -** A qualified individual is the person located in the United States who meets the requirements identified in the respective federal regulations (USCG, EPA, RSPA, MMS), and who is authorized to do

the following: (1) activate and engage in contracting with oil spill removal organizations; (2) act as a liaison with the On-Scene Coordinator; and (3) obligate funds required to effectuate response activities. The qualified individual will be the individual or a designee identified in the response plan.

¤ **Self-Certification -** Self-certification is where the plan holder declares he or she has met the following standards: (1) completion of the exercise; (2) conducting of the exercise in accordance with the PREP guidelines, meeting all objectives listed; and (3) evaluation of the exercise using a mechanism that appraises the effectiveness of the response or contingency plan.

¤ **Self-Evaluation -** Self-evaluation means that the plan holder is responsible for carefully examining the effectiveness of the plan for response during the exercise. The plan holder may choose the mechanism for conducting this appraisal, as long as it appropriately measures the plan effectiveness. The plan holder is responsible for addressing issues that arise in the exercise that would lead to improvements in the response plan or any aspect of preparedness for spill response. The plan holder is responsible for incorporating necessary changes to the response plan as a result of the exercise.

¤ **Spill Management Team -** The spill management team is the group of personnel identified to staff the appropriate organizational structure to manage spill response implementation in accordance with the response plan.

¤ **Tabletop Exercise** - For the purpose of the PREP, a tabletop exercise is an exercise of the response plan and the spill management team's response efforts without the actual deployment of response equipment.

¤ **Timely -** (as used in relation to CG and EPA government-initiated unannounced exercise programs) means the times established in the appropriate response planning regulations issued by the EPA and USCG for providing response resources to a small or average most probable spill.

¤ **Unified Command -** This entity is a command structure consisting of the On-Scene Coordinator, the State, the Responsible Party and other parties as appropriate. The Unified Command is utilized during a spill response to achieve the coordination necessary to carry out an effective and efficient response.

¤ **Verification -** Verification is the act of ensuring that an exercise was properly documented and certified. Verification would be conducted by the Coast Guard, EPA, RSPA, or MMS. Verification of the exercise records may be conducted through normal operations of the regulatory agency, such as

inspections, boarding, spot checks, or other systems developed to ensure exercises are being conducted and properly documented.

¤ **Vessel -** For the purpose of the oil spills, a "vessel" is any vessel required by 33 CFR 155.1015 to submit a response plan. For the purpose of hazardous substance releases, a “vessel” is any vessel required by 33 CFR 155. 3030 to submit a response plan. A "vessel" includes unmanned barges.

SECTION 2: GUIDING PRINCIPLES

Internal and External Exercises

→ **Internal Exercises.**

Internal exercises are those that are conducted wholly within the plan holders organization. While the internal exercises include personnel such as the qualified individual and those affiliated with the plan holder's spill management team, OSRO, the internal exercises usually do not involve other members of the response community. The internal exercises are designed to examine the various components of the response plan to ensure the plan is adequate to meet the needs of the organization for spill response.

The **Internal** exercises include --

- Qualified individual notification exercises;
- Emergency procedures exercises for vessels and barges;
- Emergency procedures exercises for facilities (optional);
- Spill management team tabletop exercises; and
- Equipment deployment exercises.

All internal exercises should be **self-evaluated** and **self-certified.**

→ **External Exercises.**

External exercises are exercises that extend beyond the internal focus of the plan holder's organization, and involve other members of the response community. The external exercises are designed to examine the response plan and the plan holder's ability to coordinate with the response community to conduct an effective response to a pollution incident.

The **external** exercises include--

- Area exercises; and
- Government-initiated unannounced exercises.

While the government-initiated unannounced exercises will not usually

involve all members of the response community, the involvement of an agency outside of the plan holders' organization places it in the category of an external exercise.

Qualified Individual Notification Exercises

The purpose of the qualified individual notification exercise is to ensure that the qualified individual (or designee, as designated in the response plan) is able to be reached in a spill response emergency to carry out his or her required duties. Contact by telephone, radio, message-pager, or facsimile must be made with the qualified individual, and confirmation must be received from him or her to satisfy the requirements of this exercise.

The qualified individual notification exercise is not intended to verify phone numbers, points of contact or the notification list contained in the plan. The plan holder is expected to update the notification list periodically (recommended at least once every 6 months) as part of the normal course of conducting business.

At least once a year, the qualified individual notification exercise should be conducted during non-business hours.

→ **Vessels.**

For vessels, it is the responsibility of the plan holder to ensure that the qualified individual notification exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this exercise.

For vessels, a telex will be acceptable, but the baseline should be voice communication. If a telex is used for this exercise, confirmation from the qualified individual must be received to properly satisfy the requirements of this exercise.

→ **Unmanned Barges.**

For unmanned barges, it is the responsibility of the plan holder to ensure that the qualified individual notification exercise is conducted. If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the qualified individual notification exercise.* The plan holder should have the barge custodian of the chosen barge conduct the exercise. The plan holder should choose the barges and the various custodians randomly. This method

will ensure that all barges and custodians are ultimately included in the exercises.

***To require each unmanned barge in a fleet to conduct this exercise quarterly would be extremely difficult and unwieldy to manage.**

Emergency Procedures Exercises

The purpose of the emergency procedures exercises is to ensure that personnel are capable of conducting the initial actions necessary to mitigate the effects of a spill.

→ **Vessels.**

For vessels, it is the responsibility of the plan holder to ensure that the emergency procedures exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this exercise. Since vessels do not always sail with the same crews, it is important that each vessel conducts this exercise quarterly to ensure that the personnel on board are familiar with the procedures for mitigating a spill occurring from that vessel.

→ **Unmanned barges.**

For unmanned barges, it is the responsibility of the plan holder to ensure the emergency procedures exercise is conducted.

***To require each unmanned barge in a fleet to conduct this exercise quarterly would be extremely difficult and unwieldy to manage.**

If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the emergency procedures exercise. The plan holder should have the barge custodian of the chosen barge conduct the exercise. The plan holder should choose the barges and the various custodians randomly to ensure that all barges and custodians will ultimately be included in the exercises.

→ **Facilities (optional).**

Facilities have the option of conducting emergency procedures exercises. For the purpose of the PREP, emergency procedures for facilities are the procedures established at the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational

activities associated with cargo transfers . An emergency procedures exercise conducted unannounced would satisfy the facility's requirement for the annual unannounced exercise.

Spill Management Team Tabletop Exercises

The response plan holder must identify a spill management team in the response plan. This spill management team shall conduct an annual tabletop exercise, in accordance with the PREP guidelines. The response plan must be utilized in the exercise to ensure the spill management team is familiar with the plan and is able to use it effectively to conduct a spill response. At least one spill management team tabletop exercise in a triennial cycle shall involve a worst-case discharge scenario.

If a response plan lists different types of spill management teams for varying sizes of spills - for example a local spill management team for small spills, a regional team for larger spills, and a national team for major spills-each team identified would be required to conduct an annual spill management team tabletop exercise.

→ **Examples of Variations in Spill Management Team Organizations**.

If an organization has one national spill management team identified for all plans within the organization, that spill management team would only have to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all type of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. For the annual spill management team tabletop exercise, the spill management team may use core response management procedures that would cover all plan holders, but the SMT must ensure it is familiar with each response plan for the vessels, facilities, pipelines and offshore facilities for which they are responsible, including the specific spill scenarios identified in each of the plans as well as the specific operations of each of the vessels, facilities, pipelines and offshore facilities. All plan holders that cite this national team in their response plans should take credit for this exercise.

Likewise, if regional spill management teams are set up within the organization, each regional team would only have to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all types of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. The spill management team may utilize core response management procedures that would cover all plan holders, but the spill management team must ensure it is familiar with each response plan for which they are

responsible, including the specific spill scenarios identified in each of the plans as well as the specific operations and unique characteristics of each of the vessels, facilities, pipelines and offshore facilities. All plan holders that cite this regional team in their response plans should take credit for this exercise.

If a plan holder uses a core spill management team to handle most spills and adds personnel to the team as the size of the spill increases, either locally or from regional locations, the entire expanded spill management team must be exercised annually.

The spill management team tabletop exercises should take into account shift changes to ensure that all personnel serving as part of the spill management team during an actual spill have participated in an exercise.

If a plan holder cites a spill management team that is not part of the plan holder's organization, i.e. "SMT for hire", that spill management team would only be required to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all types of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. One or more representatives from each plan holder organization that the spill management team represents must participate in the exercise. During the spill management team tabletop exercise, the spill management team must utilize each response plan to ensure familiarity with the spill scenarios identified in each of the plans as well as the specific operations of each vessel, facility, pipeline, and offshore facility the spill management team represents. The spill management team must also work with each plan holder representative to ensure the spill management team is able to incorporate the response management operations into the plan holder's organization during spill response. The spill management team should provide all plan holders with documentation upon completion of the spill management team tabletop exercise, and each plan holder should take credit for the exercise.

→ **Vessels.**

For vessels, if a plan holder has one response plan for a fleet of vessels and cites the same spill management team for more than one or all of the plans, the spill management team would only have to conduct one spill management team tabletop exercise annually, as long as the core response plan is used in the exercise and the spill management team demonstrates knowledge of the geographic specific annexes of the vessels during the exercise. All vessel plan holders in the fleet citing this spill management team should take credit for the annual exercise.

→ **Pipelines.**

For pipelines, the spill emergency response team is the spill management team.

Equipment Deployment Exercises

The equipment deployment exercise applies to all plan holders. It is the responsibility of the plan holder to ensure that the Equipment Deployment Exercise requirement is met.

The two primary requirements for the equipment deployment exercise are:

1. The personnel that would normally operate or supervise the operation of the response equipment must participate in the exercise. The personnel must demonstrate their ability to deploy and operate the equipment, while wearing appropriate personal protective equipment. All personnel involved in equipment deployment and equipment operators must be involved in a training program.

2. The response equipment must be in good operating condition. The equipment must be appropriate for the intended-operating environment. The equipment must operate during the exercise. All response equipment must be included in a maintenance program.

Although not required as part of the equipment deployment exercises, plan holders are encouraged to use these exercises as an opportunity to validate response strategies detailed in response/contingency plans for the geographic area where the exercise is being conducted.

A plan holder is responsible for ensuring exercise of all equipment types cited in the plan whether plan holder owned or provided through an OSRO.

The purpose of the equipment deployment exercise is to validate that the equipment is appropriate for the operating environment in which it is intended to be used and that operating personnel are trained and capable of its deployment and operation. Thus it is not necessary to deploy every piece of each type of equipment as long as all equipment is included in a periodic inspection and maintenance program intended to ensure the equipment remains in good working order. However, all operating personnel must participate in exercises or responses on an annual basis in order to ensure they remain trained and qualified to operate equipment in the operating environment.

Note that the CG applies the same standards to HSRO owned equipment deployment exercises as described below for OSROs.

→ **OSRO Involvement in Equipment Deployment Exercises.**

The PREP guidelines identify the minimum amount of equipment that must be deployed in an equipment deployment exercise. This amount is considered to be a representative sample of the equipment. The rationale for this approach is that if the representative sample works, then the rest of the equipment could be expected to work since it would be part of the company's maintenance program. For the personnel, if a representative sample of the OSRO's personnel are involved in the deployment exercise and handle their responsibilities effectively, the rest of the personnel could be expected to be knowledgeable and effective since they would be a part of the company's training program. *When selecting the equipment and personnel for the exercise, the* OSRO *should ensure that the same equipment and personnel are not used repeatedly for each exercise. The equipment should be selected on a rotational basis, as with the personnel, with the ultimate goal of eventually exercising all of the* OSRO's *equipment and personnel.*

If an OSRO has separate field response facilities located throughout the country in areas that do not lend themselves to regional consolidation, each staffed field response facility, for the purpose of the PREP, will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise of the minimum amount of equipment specified in the in the PREP.

In both cases, if the OSRO is classified to deploy equipment to more than one type of operating environment, the OSRO must conduct a deployment exercise in each of the environments.

A few of the larger OSROs have small field response facilities. A field response facility is defined as a location where personnel and equipment are staged. Some of these OSROs have divided their operations into regional response facilities. In some instances, a regional facility will be responsible for several small field response facilities or equipment stockpiles. For the purpose of the equipment deployment exercises under the PREP, **each regional facility** will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise of the minimum amount of equipment specified in the PREP. The OSRO regional facility would be responsible for coordinating resources from all field facilities within the region for the exercise. In such instances, equipment may be drawn from one or more field facilities, but <u>personnel</u> from <u>each</u> field facility must participate in the equipment

deployment exercise. If the OSRO operates using regional facilities, the OSRO will be responsible for defining its regional boundaries and providing information to its plan holders. Generally, however regions should be reasonable in geographic size. At a minimum, plan holders must ensure their OSRO(s) conduct annual equipment deployment exercises in each operating environment in which they expect to operate for each CG District or Regional Response Team Regions and EPA Area Contingency Planning area, or EPA sub-area (where identified), unless adjoining areas or sub-areas authorize an alternative. For example, if an OSRO is located in the First CG District, and provides response assets to the Fifth CG District as well those two might mutually agree to allow the OSRO to conduct fewer exercises due to similarity of operating environments in those areas and opportunity to observe the exercises. The OSRO should request this consideration in writing from the appropriate Contingency Planning Area and sub-area.

If the OSRO is cited in a response plan outside of its normal equipment staging and operating areas (i.e. as a Tier 2 responder), the plan holder citing that OSRO must ensure that the OSRO has the local knowledge relevant to an effective, efficient response in the plan holder's operating area. The plan holder must describe arrangements for providing the OSRO with information such as equipment launching locations, tides and currents of the local area, and any other logistical problems or information specific to the particular area.

The OSRO should provide documentation of completion of the exercise requirements to each plan holder covered by that OSRO. It is the plan holder's responsibility to ensure that the OSRO has completed the equipment deployment exercise requirements and has obtained the necessary documentation. All plan holders identifying an OSRO in their response plans as providing response resources should take and document their credit for completing the equipment deployment exercise requirements once documentation is received from the OSRO. All plan holders must remember that merely citing an OSRO in their response plan is not sufficient to ensure credit for the equipment deployment exercise.

→ **Cooperatives (Co-ops).**

<u>For co-ops that are comprised of several</u> OSROs, **each separate OSRO** that makes up the co-op would be required to conduct an <u>annual</u> equipment deployment exercise of the <u>minimum amount of equipment</u> listed below.

<u>For co-ops that are comprised of facility equipment and personnel pooled together</u>, **for the purposed of the PREP, this type of co-op is considered an OSRO** and would be required to conduct the equipment deployment exercise as outlined in the OSRO section. This co-op, which is formed by a

number of facilities pooling their response equipment and personnel together, would be required to conduct an equipment deployment exercise of the minimum amount of equipment listed below annually. Each facility and the personnel will not have to conduct the exercise individually. The co-op as a whole would conduct one equipment deployment exercise per year. Representatives from all of the facilities comprising this co-op must participate in this exercise.

Co-op personnel that are responsible for deploying the response equipment must be involved in a training program, which prepares them for operating the response equipment. Likewise, the Co-op must have a maintenance program for all of the response equipment.

→ **Vessel and Facility Plan Holder Owned and Operated Equipment.**

Plan holder owned and operated equipment is that equipment owned by a plan holder and operated either by the plan holder's own personnel or other personnel hired by the plan holder to operate this equipment. Whoever operates this equipment must be involved in the equipment deployment exercises.

Plan holders that have plan holder owned and operated equipment, and have this equipment identified in their response plan for spill response, would be required to deploy this equipment twice a year (semiannually). The plan holder would be required to deploy the minimum amount of equipment for deployment specified below or the total amount of equipment that plan holder has available for response, whichever is less. The requirement for semiannual equipment deployment is based on the fact that this equipment is not deployed routinely and that the personnel operating it do not do this as a part of the vessel's or facility's normal operations. The semiannual requirement is necessary to ensure adequate preparedness for spill response.

The plan holder's personnel responsible for deploying the response equipment must be involved in a training program which prepares them for operating the response equipment. Likewise, the vessel/facility plan holder must have a maintenance program for all of the response equipment.

→ **Plan Holders Using a Combination of OSRO Equipment and Plan Holder Owned and Operated Equipment**

Plan holders citing both OSRO equipment and their own equipment in their response plans would be required to exercise both types of equipment at the above described intervals.

→ **Minimum Amount of Equipment to be Deployed in Internal Equipment Deployment Exercises.**

I. Hazardous Substance Incident Assessment Equipment used in the initial assessment and response to hazardous substance releases. Note that this type of equipment is not required by regulation for oil spill response.

a) Monitoring- Air, surface and subsurface plume monitoring equipment.

b) Personal Protective Equipment-Protective clothing, protective breathing apparatus appropriate to protecting responders in the environments to which they might be exposed in responding to a release

c) Technical Equipment - Used for trajectory analysis.

→ **Oil and Hazardous Substance Response Systems.**

A) Mechanical - Skimming/Recovery Systems - One of each type of Skimming System as listed in the plan. A Skimming System includes containment boom, hoses, piping, pumps, prime movers, support vessels, etc. necessary for the effective operation of that system.

Types of Skimming/Recovery Systems include:

- Oleophilic - Brush
- Oleophilic - DiscOleophilic - Paddle Belt
- Oleophilic - Rope Mop
- Oleophilic - Sorbent Lifting Belt
- Oleophilic - Submersion Belt
- Oleophilic - Submersion Plane
- Suction (including vacuum trucks)
- Weir
- Advancing Weir

- Special Purpose skimmers (e.g. fast water)

B) In-Situ Burn Systems – Each ISB package listed in the plan and relied on by the plan holder in meeting response equipment capability requirements - including boom, method of ignition, support vessels and smoke plume monitoring equipment. Deployment or use of in situ-burning should not occur during the exercise unless directed by the Federal On-Scene Coordinator.

C) Dispersant Systems – Each dispersant package listed in the plan and relied on by the plan holder in meeting response equipment capability requirements , including dispersant delivery vehicles, application equipment, and dispersed oil plume monitoring equipment. Deployment or use of the actual dispersant should not occur during the exercise unless directed by the Federal On-Scene Coordinator.

II. Booming Systems (includes protective and containment boom not exercised as part of a skimming or in-situ burning system described above) 1,000 feet (or total amount of boom listed in plan, whichever is less) of each protective or containment boom system listed in the plan and relied on by the plan holder in meeting response equipment capability requirements. Protective boom systems (boom and means of deploying and anchoring) include the following types:

- Fence Boom
- Curtain Boom: internal foam; external foam, self-inflatable and pressure inflatable.
- External Tension Boom
- Tidal Seal Boom **(Only 50 feet of this type of boom need be deployed.)**
- Special Purpose
- -Ice Booms

***Fast Water Booms (Equipment and/or techniques intended to improve spill containment, control in fast water situations).**

→ **Area Equipment Deployment. (Oil only).**

The area equipment deployment exercise involves Coast Guard and EPA "first aid" response equipment and the Coast Guard's prepositioned equipment. All of the "first aid" equipment or that which is necessary to respond to an average most probable discharge in the area, whichever is less, would be deployed annually.

Internal Unannounced Exercises

THIS IS NOT A SEPARATE EXERCISE. THIS SECTION OUTLINES THE REQUIREMENT THAT ONE OF THE PREP EXERCISES USED BELOW MUST BE CONDUCTED UNANNOUNCED.

Annually, each plan holder should ensure that one of the following exercises is conducted unannounced:

- ♦ Emergency procedures exercise for vessels and barges;
- ♦ Emergency procedures exercise for facilities (optional);
- ♦ Spill management team tabletop exercise; or
- ♦ Equipment deployment exercise.

An unannounced exercise is where the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill incident.

To ensure that the nation maintains an adequate posture for response preparedness, and to satisfy the OPA 90 requirement for unannounced exercises, it is necessary to have an exercise program, which is comprised of both announced and unannounced exercises. The requirement for the annual unannounced exercise is necessary to maintain the level of preparedness necessary to effectively respond to a spill.

Response to an actual spill should be taken as credit for the unannounced exercise requirement, if the response was evaluated.

The emergency procedures exercise is being offered as an option for facilities, to provide an additional exercise that may be conducted unannounced.

Government-Initiated Unannounced Exercises

The government-initiated unannounced exercises are designed to give the agency with primary regulatory oversight over a particular industry the opportunity to evaluate, on a random basis, the response preparedness of that industry. The PREP has attempted to make this requirement as reasonable as possible. The frequency of these drills for the noted Agencies are as follows:

- For Coast Guard regulated vessels and facilities, the government - initiated unannounced exercises are limited to four per area per year.
- For EPA-regulated facilities, the government-initiated unannounced exercises are limited to 10% of the plan holders per EPA region per year.
- For RSPA-regulated pipelines, the government-initiated unannounced exercises are limited to 20 annually across the nation.
- For MMS-regulated offshore facilities, the number of government-initiated unannounced exercises are determined by the Regional Supervisor and may exceed 50 per year nationally. A facility will not face an MMS unannounced exercise more than once per year, unless the results of previous exercises indicate that follow-up drills are warranted due to poor performance during a drill.

A plan holder directed to participate in a government-initiated unannounced exercise is required to participate as directed unless specific conditions exist that may result in safety hazards. The cost of the unannounced exercise will be borne by the response plan holder.

For complex facilities that are regulated by two or more agencies, it is the responsibility of the exercising agency to notify and invite the participation of the other agency and the responsible On-Scene Coordinator in advance, so as to minimize the possibility of the facility being exercised multiple times during a compressed time period.

A plan holder that has successfully completed a government-initiated unannounced exercise would not be required to participate in another Federal government - initiated unannounced exercise for at least 36 months from the time of the last exercise provided that the drill protocols and method of evaluation are equivalent. The plan holder must maintain documentation of this participation.

Guidelines for determining successful completion of an exercise and for determining enforcement actions (including but not limited to civil penalties) for an unsuccessful exercise are the responsibility of the individual oversight agencies, based on application of their individual agency regulations.

→ **Successful Completion of Government-Initiated Unannounced Exercises.**

A government-initiated unannounced exercise must be successfully completed as determined by the initiating authority. Failure to successfully complete an exercise indicates that either the plan holder could not properly implement its response plan, that the response resources were not available or not in operating condition, or that response personnel were not adequately trained in implementing the response plan. These are all causes for corrective action that may include but is not limited to additional unannounced exercises and revisions to the submitted response plan. For an exercise to be successful it is intuitive that it must meet the Scope and Objectives of the exercise element. It is the responsibility of the agency with oversight of the regulated entity to develop specific guidelines for determining the successful completion of an exercise and for determining appropriate enforcement actions (including but not limited to civil penalties) for an unsuccessful exercise.

One of the objectives for successful completion of an exercise is the concept of demonstrating that the response can be conducted in a timely manner. Note that the connotation of timely remains a planning rather than a performance standard. Timely is **defined** in Section 1 of these guidelines and is further discussed in specific portions of the Guiding Principles and in those sections of the Guidelines which address specific exercise elements for vessels and facilities.

Marine Transportation-Related Facilities and Vessels Regulated by the U.S. Coast Guard.

Coast Guard personnel conducting USCG-initiated unannounced exercises will be guided by the following concepts when determining success of an exercise. Keeping in mind that response time frames in the regulations are planning standards and not performance standards, and that the government initiated unannounced exercise program focuses on average most probable discharges, successful completion cannot be determined by a stopwatch, but by subjective evaluation of a variety of factors including:

1. Response resources located within 17-mile radius of transfer site (boom - 1 hour response time over the road given half hour for mobilization) and 52-mile radius of transfer site (recovery equipment -

2 hour response time over the road given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.

2. For lightering, bunkering etc, on water, Response resources located within 2.5 nautical mile radius of transfer site (boom - 1 hour response time over the road given half hour for mobilization) and 7.5 nautical mile radius of transfer site (recovery equipment - 2 hour response time over the road given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.

3. Personnel to operate the equipment need not be co-located with the equipment, as long as those personnel are located within the same response radii and personnel needed to mobilize and transport the equipment are co-located with the equipment.

4. If plan holder notifies and orders OSRO equipment quickly and the OSRO demonstrates it's capability to mobilize the equipment immediately then the precise time the equipment arrives on scene is not important. USCG exercise personnel may opt to send a team to the OSRO site to observe mobilization as part of the exercise. (E.g., Boom is 7 miles away from transfer site - at 35 miles per hour that boom can be on scene in 12 minutes, so if notification and mobilization can be completed in 45 minutes, it is reasonable to assume that the boom will be on scene in less than one hour. If boom is 17 miles away notification and mobilization must be completed in 30 minutes. If it is 28 miles away, mobilization must be complete in 15 minutes, and so on.).

5. Under the above circumstances is does not matter how soon the equipment and personnel arrive on scene because any delay can reasonably be presumed to have been caused by the instant conditions rather than the average conditions on which the planning travel times are based.

6. Once the equipment is delivered on scene, personnel should be able to deploy and operate the equipment without significant difficulty (people should generally be aware of locations of equipment launch sites, anchoring points and deployment strategies.) However, because specific conditions vary at every site, deployments are not likely to be entirely seamless and deployment personnel may need to make adjustments that will delay completion of deployment. In fact, the ability to adjust to these differing environmental conditions may be an indicator of the competence of response personnel.

7. While it is intended that equipment be in the water and operational before the end of 4-hour exercise period, there are circumstances, particularly related to safety and non-interference with actual operations that may delay completion of deployment beyond that time. In such a case, exercise should continue until equipment is deployed and operated satisfactorily.

→ **Non-transportation-Related Facilities Regulated by the Environmental Protection Agency.**

The measure of an effective unannounced government-initiated exercise will be the overall ability of the responders identified in the facility response plan to rapidly and effectively control a small discharge with particular attention to those actions that afford the best chances to control a spill and minimize its impact in the first few hours of the incident. While recognizing that an effective response to an oil discharge entails the rapid deployment of proper equipment, it is not the intention of the EPA to use timeliness as the sole factor when evaluating the response to a government-initiated unannounced exercise for a small discharge. EPA personnel will evaluate whether the response equipment specified in the response plan arrives at the specified times. These times are listed in the response plan and are based on the response planning requirements in 40 CFR 112 or alternative response times when approved by the Regional Administrator. Whether the containment boom and recovery devices specified in the response plan arrive precisely at the specified times is less relevant than the overall conduct of the exercise and the successful achievement of the exercise objective described in PREP. The objective of a government-initiated unannounced exercise for a small discharge includes the following sub-objectives:

- Conducting proper notifications;
- Arrival of containment boom as specified in the approved response plan within one hour of detection of the discharge and the subsequent successful deployment;
- Arrival of oil recovery devices as specified in the approved response plan within two hours of detection of the discharge and the subsequent successful operation/simulated recovery;

- Demonstrating the availability of adequate storage capacity for recovered oil; and

- Properly conducting the exercise considering the size of a small discharge including skill and competency of responders and material readiness of response equipment.

The failure to achieve any one sub-objective should not automatically indicate that an exercise is a failure. EPA personnel evaluating the exercise should assess: the plan holders ability to conduct proper notifications; material readiness of response equipment; and the overall ability of responding personnel to mobilize, arrive on scene in a timely manner, properly deploy the containment boom, simulate recovery of oil, and demonstrate skill and competency during the 4 hour exercise window.

The EPA exercise evaluator will have a subjective role in determining the success of the exercise based on the achievement of the exercise objectives within the specific time. These evaluations will be dependent on spill site and circumstances. EPA personnel may request to review records of previous facility response plan exercises when there is a concern that the response time is excessive. As the result of an unsuccessful exercise the EPA may require the plan holder to participate in additional unannounced exercises, revise the existing response plan, or both. Unsuccessful unannounced exercises may also result in enforcement action against the plan holder.

→ **Safety During Exercises and Responses.**

The responsibility for safely conducting an exercise or an actual response remains with the plan holder and responding personnel. The response plan should comply with all the regulatory requirements while considering safety factors. Plan holders and responders are never expected to operate in an unsafe or illegal manner during an exercise or actual response. The plan holder is responsible to confirm that the resources identified in the response plan can mount an effective response while operating within all applicable laws and regulations. In short, there is no expectation or justification for placing people at risk during an exercise or response. Conducting the exercise in an unsafe manner is likely to contribute to an unsatisfactory exercise.

Triennial Exercise of the Entire Response Plan.

Every 3 years all components of the entire response plan must be exercised. Rather than requiring each plan holder to conduct a major-exercise every 3

years, the PREP allows for the individual components to be exercised in portions through the required exercises.

The following are the basic types of plan components that must be exercised at least once every 3 years:

Organizational Design

(1) Notifications
(2) Staff mobilization
(3) Ability to operate within the response management system described in the plan

Operational Response

(4) Discharge control
(5) Assessment of discharge
(6) Containment of discharge
(7) Recovery of spilled material
(8) Protection of sensitive areas
(9) Disposal of recovered material and contaminated debris

Response Support

(10) Communications
(11) Transportation
(12) Personnel support
(13) Equipment maintenance and support
(14) Procurement
(15) Documentation

While not all of these components would necessarily be contained in each plan, the plan holder should identify those that are applicable from the list above, and add or delete other components as appropriate. The plan holder would then be responsible for ensuring that all components of the plan are exercised within each 3-year exercise cycle.

To satisfy the requirement of the triennial exercise of the entire response plan, it is not necessary to exercise the entire plan all at one time. The plan may be exercised in segments over a period of 3 years, as long as each component of the plan is exercised at least once within the 3-year period. The required exercises should be developed to ensure that each component is addressed and exercised in the triennial cycle. Appendix A

includes a template for use by plan holders tacking exercise completion over the 3-year PREP cycle.

The plan holder is responsible for documenting the components completed in the exercises.

→ **Triennial Cycle.**

In the triennial cycle, the following internal exercises must be conducted

- **12 qualified individual notification exercises;**
- **12 emergency procedures exercises**--manned vessels and unmanned barges (optional for facilities);
- **3 spill management team tabletop exercises--**one must involve a worst case discharge scenario;
- **3 unannounced exercises--**any of the exercises, with the exception of the qualified individual notification exercise, if conducted unannounced, would satisfy this requirement;
- **Equipment deployment exercises as described below:**
  - For vessel/facility owned and operated equipment-
    - 6 plan holder owned and operated equipment deployment exercises (for plan holders with vessel/facility owned and operated equipment identified in their response plan)
  - For vessels and facilities with OSROs identified for response equipment-
    - 3 OSROs equipment deployment exercises
  - For pipelines -
    - 3 pipeline equipment deployment exercises (using either OSRO and/or operator owned equipment
  - For offshore facilities
    - 3 equipment deployment exercises (for equipment staged onshore)

    - 6 equipment deployment exercises (for equipment staged offshore); and
- **Triennial Exercise of Entire Response Plan -** Each component of the response plan must be exercised at least once in the triennial cycle.

Area Exercises

The purpose of the area exercise is to exercise the entire response community in a particular area. An area is defined as that geographic area for which a separate and distinct Area Contingency Plan has been prepared, as described in OPA 90. The response community includes the federal, state and local government and industry. The area exercises are designed to exercise the government and industry interface for spill response.

The goal of the PREP is to conduct 20 area exercises per year nationwide, 60 within a triennial cycle. This method should ensure that all areas of the country are exercised triennially. Six of the 20 annual area exercises would be led by the government, that is the Area Committee, with a single industry plan holder as exercise partner. Industry plan holders would lead the other 14 with the Area Committee as exercise partner. An exercise design team will develop all of the area exercises. The exercise design team is comprised of representatives from the federal, state, and local government agencies, the local response community and the industry plan holder. A lead plan holder would lead each area exercise. The lead plan holder is the organization (government or industry) that is responsible for the primary plan that is exercised in the area exercise. The lead plan holder would have the final word on designing the scope and scenario of the exercise. The U.S. Coast Guard or the EPA, as Area Committee chair, would be the lead plan holder for the 6 government led exercises, with RSPA and MMS participating as appropriate.

A *suggested* mix of participants for the industry led area exercises would include:

- Vessels (6 exercises);
- Marine transportation-related (MTR) facilities (2 exercises);
- Onshore and certain offshore non-transportation-related facilities (2 exercises)
- Pipelines (2 exercises); and

- Offshore facilities (2 exercises).

The area exercises do not necessarily have to be large-scale productions. The scenario does not always have to involve a worst-case discharge. However at a minimum, the scenario must involve exercise of Tier I Worst-Case discharge capability. The primary purpose of the area exercise is to activate and observe the response infrastructure in the area, and the ability of the entire response community to effectively conduct a spill response. The focus should be on the interaction between the responsible party and the federal, state and local government to exercise both the Area Contingency Plan and the responsible party's response plan. The following are recommendations for the area exercises:

- Each exercise should be approximately 8-12 hours in duration. The exercises may be longer, if agreed to by the exercise design team.

- The area response mechanism would be evaluated in each area exercise. The unified command would be exercised.

- The lead plan holder will have the primary voice and final decision authority in the exercise design. However, exercise design should be conducted as a cooperative effort of the entire exercise design team.

- The exercise scenario will involve some amount of equipment deployment. The extent of equipment deployment should be determined by the lead plan holder after consulting with the exercise design team.

Area exercise equipment deployment should include testing adequacy of various response strategies contained in the plan, including but not limited to: protective booming for shoreline, fish, wildlife, and sensitive environment; fast-water, open-water, or shallow water containment and collection; or dispersant or in-situ burn operations. If the exercise spill scenario involves a maximum most probable or larger spill, a minimum of tier 1 equipment deployment should be conducted.

Equipment deployment need not be conducted simultaneously with the tabletop portion of the exercise. It may be done several weeks or even months prior to or after the tabletop to allow more efficient allocation of exercise planning and execution resources.

An Industry plan holder that participates in an Area Exercise would not be required to participate in another area exercise for a minimum of 6 years.

Plan holders are responsible for funding their participation in the area exercises.

An evaluation report should be completed not later than 60 days after completion of the area exercise. The evaluation report is completed by the joint evaluation team. For USCG Area Exercises, results of these joint evaluations will be entered in CGSAILS.

Area Exercise Scheduling

Scheduling of area exercises will be done under a nationally coordinated system that involves the federal, state and local governments and industry plan holders, and that recognizes the unique needs of specific geographic regions of the country.

→ **NSCC.**

A National Schedule Coordination Committee (NSCC) has been established for scheduling the area exercises. The NSCC is comprised of personnel representing the four federal regulating agencies - the Coast Guard, EPA, RSPA, and MMS.

→ **Scheduling Process.**

The NSCC is charged with developing and publishing a proposed area exercise schedule for each upcoming triennial period. This proposed schedule will be published in the Federal Register annually. The reason the exercises are scheduled three years in advance is to allow both area committees and industry plan holders to allocate sufficient funds and personnel. The NSCC will solicit comments on the proposed schedule and industry plan holders to lead and participate in the Area Exercises. It is important to note that the NSCC only proposes which area plans will be exercised over the three-year period. It is incumbent on the Regional Response Teams and Area Committees with jurisdiction over an area, to validate the proposed timeframe and to identify the industry plan holder who will participate in the exercise. Each Regional Response Team and Area Committee should work with the local industry to identify industry plan holders three years in advance of the scheduled exercise. Industry plan holders may also provide input to the scheduling process through the Area Committees.

Other Credit Issues

→ **Credit for Spill Response.**

Plan holders may take credit for internal exercises conducted in response to actual spills. The spill response must be evaluated. The plan holder must determine which exercises were completed in the spill response. This determination should be based on whether the response effort would meet the objectives of the exercise as listed in the PREP guidelines. The plan holder must document the exercises completed.

The NSCC is responsible for authorizing credit for area exercises, based on the recommendations of the On-Scene Coordinator. Credit should be given to a plan holder for participation in an area exercise if the following circumstances exist (1) the response plan was utilized in an actual spill response; (2) the response involved the entire response community; (3) the objectives of the area exercise were met as outlined in the PREP guidelines; (4) the response was evaluated; and (5) the spill response was properly documented and certified. Note that actual spills must involve, at minimum, deployment of worst-case discharge tier 1 capabilities to be eligible for this credit.

→ **Proper Documentation for Self-Certification.**

Proper documentation for self-certification should include, as a minimum, the following information:

- The type of exercise.
- Date and time of the exercise.
- A description of the exercise.
- The objectives met in the exercise.
- The components of the response plan exercised.
- Lessons learned.

This documentation must be in writing and signed by an individual empowered by the plan holder organization.

Sample documentation forms are attached as Appendix A to the PREP Guidelines.

As a general rule, exercise records should be completed within 30-60 days of the exercise, although this may vary depending on exercise complexity.

Special Issues

→ **Complexes.**

Complexes are facilities that must meet the requirements of more than one federal agency. For example, a facility that has oil storage tanks, a pipeline and a waterfront oil transfer dock is considered a complex since it must meet the requirements of EPA, RSPA and the Coast Guard.

Complexes would only be required to conduct one exercise to meet all agency requirements for that particular type of exercise. For example, if a quarterly notification exercise is required by all three agencies regulating the complex, one notification exercise per quarter would satisfy the requirements for all three regulatory agencies.

→ **Vessels Serving as Secondary Carriers of Oil.**

Vessels serving as secondary carriers of oil should comply with the exercise requirements in 33 CFR 155.1045(h).

→ **TAPAA Vessels and Facilities.**

Trans-Alaska Pipeline Authorization Act (TAPAA) vessels and facilities, in addition to complying with the primary exercise requirements, must comply with the additional exercise requirements identified in the vessel and facility response plan regulations at 33 CFR 155.1125(a)(2) and 33 CFR 154.1125(a)(2), respectively.

→ **LEPC Drill Credit.**

Local Emergency Planning Committees (LEPCs) are required to conduct hazardous substance exercises periodically. Industry plan holders should coordinate their exercises with the LEPCs, whenever possible, and should take credit, as long as the PREP exercise objectives are met.

→ **Foreign Vessels Calling Only Occasionally at U.S. Ports.**

If a vessel plan holder has a response plan, prepared with the intent that the vessel would be calling at U.S. ports, even if only occasionally, the vessel plan

holder must have an exercise program in place and be conducting the required exercises. If the plan holder is following the PREP guidelines, all exercises must be conducted at the frequency listed in the PREP guidelines. The only exception to this requirement is the qualified individual notification exercise, which is only required to be conducted quarterly while operating in U.S. waters, otherwise upon entry into U.S. waters.

If a vessel comes into U.S. waters for the first time, but intends to continue trading, it must conduct the qualified individual notification exercise immediately, and then begin its exercise program. Since the PREP follows the calendar year, the triennial cycle should begin as soon as the vessel enters U.S. waters. The vessel should remain on the calendar year schedule, with the following January 1 beginning the next year of the vessel's triennial cycle. In such cases, the plan holder will only be expected to complete 2 full years of internal exercises during the first triennial cycle. For the first year, the plan holder must complete one QI notification and one emergency procedures exercise each quarter during that year. Spill management team and equipment deployment exercises are recommended as soon as possible, but can be held up to 11 months after the date of the first entry into U.S. Waters.

If the vessel only intends to make one voyage into U.S. waters, the vessel must conduct the qualified individual notification exercise immediately upon entry. If the vessel intends to reenter the U.S. at any time, it must comply with all exercise requirements.

→ **Railroad Tank Cars and Motor Vehicle Tank Trucks**

There are few individual railroad tank cars or motor vehicle tank trucks transporting sufficient volumes of oil to be subject to the response planning requirements of OPA 90. For additional information on response planning requirements for individual railroad tank cars and motor vehicle tank trucks transporting oil, including training, equipment testing, and drills, see 49 CFR 130. A railroad tank car or a tank truck which transfers oil to or from certain vessels may be considered to be a mobile marine transportation-related facility and may be subject to the response planning requirements in 33 CFR 154. Loading and offloading of railroad tank cars and tank trucks at certain non-transportation related facilities may be covered by response plans prepared by a facility owner or operator subject to the requirements contained in 40 CFR 112.

Section 3:

U.S. Coast Guard – Regulated

Vessels and

Marine Transportation-Related Facilities

QI Notification Exercise

Coast Guard Marine Transportation-Related (MTR) Facilities

Applicability: Facility.

Frequency: Quarterly.

Initiating Authority: Company policy.

Particip. Elements: Facility personnel, qualified individual.

Scope: Exercise communications between facility personnel and qualified individual.

Objectives: Contact must be made with a qualified individual or designee, as designated in the response plan.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept at the facility.

Evaluation: Self-Evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will

satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

QI Notification Exercise

Manned Vessels

Applicability: Manned vessels.

Frequency: Quarterly while operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise upon entry into U.S. waters, not to exceed four times per year. The qualified individual notification exercise would not be required for ships outside U.S. waters.

Initiating Authority: Master or designee according to plan.

Particip. Elements: Vessel personnel, plan designated shore side personnel, and a vessel's qualified individual.

Scope: Exercise communication between vessel personnel and qualified individual.

Objectives: Contact by telephone, radio, message-pager or facsimile a confirmation must be made with a qualified individual or designee as designated in the plan. A telex may be used only if the other means are not available

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

- **Retention:** 3 years.
- **Location:** Logbook entry indicating time of qualified individual notification as provided at 33 CFR 155.1060(e)(1).

Evaluation: Owner or operator should conduct review to determine if objectives have been met.

Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

QI Notification Exercise

Unmanned Barges

Applicability: Unmanned barge.

Frequency: Quarterly while operating in U.S. waters, including the exclusive economic zone; otherwise upon entry into U.S. waters, not required to exceed four times per year. The qualified individual notification exercise would not be required for barges outside U.S. waters.

Initiating Authority: Barge owner or operator or towing vessel captain.

Particip.. Elements: Barge custodian and qualified individual.

Scope: Exercise communication between barge custodian and qualified individual.

Objectives: Contact-by telephone, radio, message-pager, or facsimile and confirmation must be made with the qualified individual or designee, as designated in the response plan.

Exercises should be conducted randomly to ensure that all barge custodians have an equal chance for participation in the notification exercises.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept on board the barge or with the response plan for the barge.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

On Board Emergency Procedures Exercise

Manned Vessels

Applicability: Manned vessels.

Frequency: Quarterly.

Initiating Authority: Master or designee according to plan.

Particip. Elements: Vessel personnel.

Scope: Exercise the emergency procedures for the vessel crew to mitigate or prevent any discharge or a substantial threat of such discharge of oil/HAZSUB resulting from shipboard operational activities associated with internal or external cargo transfers.

Objectives: Conduct an exercise of the vessel's emergency procedures to ensure crew knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the crews' actions.

Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example -

> Simulation of response to a collision.

> Simulation of response to an oil spill on the deck of the vessel.

> Simulation of response to a vessel fire.

Annually ensure that spill mitigation procedures for all contingencies identified in the response plan have been exercised.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Logbook entry as provided at 33 CFR 155.1060(e)(1).

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

On vessels covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Emergency Procedures Exercises

Unmanned Barges

Applicability: Unmanned barge(s).

Frequency: Quarterly.

Initiating Authority: Barge owner or operator.

Particip. Elements: Barge custodian.

Scope: Exercise the emergency procedures to be taken for an oil/HAZSUB discharge or substantial threat of such discharge. Such procedures are outlined at33 CFR 155.1040 (a).

Objectives: Conduct a walk-through of the emergency procedures.

Ensure barge custodians know proper actions to take in the event of an oil discharge or substantial threat of such discharge.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept on board the barge or with the response plan for the barge.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit

should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

On vessels covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Emergency Procedures Exercises

Facilities (Optional)*

Applicability: Facility.

Frequency: Quarterly.

Initiating Authority: Facility owner or operator.

Particip. Elements: Facility personnel.

Scope: Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil/HAZSUB resulting from facility operational activities associated with oil transfers.

Objectives: Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the emergency procedures.

Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example, the exercise should involve a simulation of a response to an oil spill.

The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***This section describes an optional exercise to provide facilities with an exercise that may be conducted <u>unannounced</u> to fulfill the internal unannounced exercise requirement.**

At facilities covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Spill Management Team Tabletop Exercise

U.S. Coast Guard MTR Facilities

Applicability: Facility spill management team

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Spill management team as established in the response plan.

Scope: Exercise the spill management team's organization, communication, and decision-making in managing a spill response.

Objectives:

Exercise the spill management team in a review of -

> Knowledge of the response plan;

> Proper notifications;

> Communications system;

> Ability to access an OSRO/HSRO;

> Coordination of internal organization personnel with responsibility for spill response;

> An annual review of the transition from a local team to a regional, national, and international team, as appropriate;

> Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS);

> Ability to access information in the Area Contingency Plan for location of sensitive areas, resources available within the area, unique conditions of area, etc

> At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Plan holders are responsible for ensuring that SMTs are familiar with Area Committees/Regional Response Teams (*RRTs) and Area Contingency Plans in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area/region in which they offer cover each year, each SMT is expected to review ACPs annually and the make-up of Area Committees/RRTs in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area

Spill Management Team Tabletop Exercise

Vessels

Applicability: Vessel spill management team.

Frequency: Annually.

Initiating Authority: Company policy.

Particle. Elements: Spill management team as established in the response plan.

Scope: Exercise the spill management team's organization, communication, and decision-making in managing a spill response.

Objectives:

Exercise the spill management team in a review of -

> Knowledge of the response plan;

> Proper notifications;

> Communications system

> Ability to access an OSRO/HSRO;

> Coordination of internal organization personnel with responsibility for spill response;

> An annual review of the transition from a local team to a regional, national, and international team, as appropriate;

> Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS.); and

> Ability to access information in the Area Contingency Plan for location of sensitive areas, resources available within the Area, unique conditions of Area, etc.

At least one Spill Management Team Tabletop Exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: In accordance with 33 CFR 155.1060(e) (2).

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Plan holders are responsible for ensuring that SMTs are familiar with Area Committees and Area Contingency Plans in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area in which they offer cover each year, each SMT is expected to review ACPs annually and the make-up of Area Committees in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area Committees in all areas in which the plan holder operates.

For plan holders who handle both oil and hazardous substances, if the same spill management team handles all oil and hazardous substance incidents, only one SMT exercise is required annually. In such cases, at least 1 of the exercises should focus on oil and 1 on hazardous substances every three years. Over the course of six years, at least one worst-case hazardous substance and one worst-case oil scenario should be exercised.

For plan holders who handle both oil and hazardous substances, if the spill management teams are not the same, separate spill management team exercises are required.

Equipment Deployment Exercises

U.S. Coast Guard MTR Facilities

Applicability: Facilities with facility owned and operated response equipment.

Frequency: Semiannually.

Initiating Authority: Company policy.

Particip. Elements: Facility personnel.

Scope: Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles", or (2) the equipment necessary to respond to an average most probable discharge at the facility, whichever is less.

All of the facility's personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the facility's equipment must be included in a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.

Objectives: Demonstrate ability of facility personnel to deploy and operate equipment.

Ensure equipment is in proper working order.
deployment should also include testing ACP containment, protection and diversion strategies.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept at facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Note: If a facility with facility owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO owned equipment.

Equipment Deployment Exercises

U.S. Coast Guard MTR Facilities

Applicability: Facilities with OSRO/HSRO response equipment cited in their response plan.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Facility owner or operator and OSRO/HSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment as described in "Guiding Principles.

All of the OSRO/HSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO/HSRO equipment must be Included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO/HSRO is documented. The OSRO/HSRO must provide inspection and maintenance information to the owner or operator.

Plan holders must ensure that when a regional OSRO/HSRO is identified in the response plan, the OSRO/HSRO conducts annual equipment deployment exercises in each operating environment for each CG Contingency Planning Area.

Objectives: Demonstrate the ability of the personnel to

deploy and operate equipment.

Ensure the response equipment is in proper working order.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

Certification: The facility owner or operator should ensure that the OSRO/HSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Records to be kept at the facility.

Evaluation: Self-evaluation.

Credits: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

Vessels

Applicability: Vessels.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Vessel owner or operator, and OSRO/HSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment as described in "Guiding Principles."

All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO/HSRO equipment must be included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The vessel owner or operator must ensure that inspection and maintenance by the OSRO/HSRO is documented. The OSRO/HSRO must provide inspection and maintenance information to the vessel owner or operator.

Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each CG Contingency Planning Area.

Objective: Demonstrate the ability of the personnel to deploy and operate response equipment.

Ensure the response equipment is in proper working order.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

Certification: The vessel owner or operator should ensure that the OSRO/HSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years (see 33 CFR 155.1060 (e)(2)).

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Government-Initiated Unannounced Exercises

Vessels and MTR Facility Response Plan Holders

Applicability: Vessel and MTR facility response plan holders within the area.

Frequency: Triennially, if successfully completed. A facility deemed by the CG/EPA not to have successfully completed the exercise may be required to participate in another government initiated unannounced exercise at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise.)

Initiating Authority: U.S. Coast Guard.

Particip. Elements: Vessel and MTR facility response plan holders.

Scope: Unannounced exercises are limited to a maximum of four exercises per area per year.

Exercises are limited to approximately 4 hours in duration.

Exercises must involve response to an average most probable discharge scenario.

RSPA and MMS would cover unannounced exercises for pipelines and offshore facilities <u>not a part of a complex</u> in their exercise programs.

Objectives: Conduct proper notifications to respond to unannounced scenario of an average most probable discharge.

Demonstrate response is -

> Timely- As a general rule, the regulatory planning standard is containment equipment (e.g., booms)

on scene within one hour of notification and recovery equipment (skimmers and temporary storage) on scene within two hours. Therefore in an government initiated unannounced exercise, plan holder should be able to initiate simulated clean up within approximately two hours of exercise commencement.

> Conducted with adequate amount of equipment for scenario; and

> Properly conducted.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

Certification: U.S. Coast Guard.

Verification: U.S. Coast Guard.

Records:

Retention 3 years.

For facilities, at the facility.
For vessels, in accordance with 33 CFR 155.1060(e)(2).

Evaluation: Evaluation to be conducted by initiating agency.

Credit: Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises, if criteria for those exercises are met, the response is evaluated by the plan holder and a proper record is generated.

Section 4

EPA-Regulated Onshore And Certain Offshore Non Transportation-Related Facilities

PREP Guidelines do not create binding legal requirements.

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of the Oil Pollution Act of 1990. An alternative program can also be acceptable subject to approval by the Regional Administrator. (See 40 CFR 112.21) Either the PREP Guidelines or the EPA-approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

QI Notification Exercises

EPA-Regulated Facilities

Applicability: Facility.

Frequency: Quarterly.

Initiating Authority: Company policy.

Particip. Elements: Facility personnel and qualified individual.

Scope: Exercise communications between facility personnel and qualified individual.

Objectives: Contact must be made with a qualified individual or designee, as designated in the response plan.

Certification: Self-certification.

Verification: Environmental Protection Agency (EPA)

Records:

Retention: 5 years.

Location: Records to be kept at the facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Emergency Procedures Exercises

Facilities (Optional)*

Applicability: Facility.

Frequency: Quarterly.

Initiating Authority: Facility owner or operator.

Partlcip. Elements: Facility personnel.

Scope: Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational activities associated with oil transfers.

Objectives: Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the emergency procedures.

Exercise should involve one or more of the sections of the emergency procedures for, spill mitigation. For example, the exercise may involve a simulation of a response to an oil spill.

The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.

Certification: Self-certification.

Verification: EPA.

Records:

Retention: 5 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***This is offered as an optional exercise to provide facilities with an exercise that may be conducted <u>unannounced</u> to fulfill the internal unannounced exercise requirement.**

Spill Management Team Tabletop Exercise

EPA-Regulated Facilities

Applicability: Facility spill management team.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Spill management team as established in the response plan.

Scope: Exercise the spill management team's organization, communication, and decision- making in managing a spill response.

Objectives: Exercise the spill management team in a review of-

> Knowledge of the response plan;

> Proper notifications;

> Communications system;

> Ability to access an OSRO;

> Coordination of internal organization personnel with responsibility for spill response;

> An annual review of the transition from a local team to a regional, national, and international team, as appropriate;

> Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS.)

> Ability to access information in Area Contingency

Plan for location of sensitive areas, resources available within the area, unique conditions of area, etc.

At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self-certification.

Verification: EPA.

Records:

Retention: 5 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

EPA-Regulated Facilities

Applicability: Facilities with facility owned and operated response equipment.

Frequency: Semiannually.

Initiating Authority: Company policy.

Particip. Elements: Facility personnel.

Scope: Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles", or (2) the equipment necessary to respond to a small discharge at the facility, whichever is less.

All of the facility personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the facility equipment must be included in a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.

Objectives: Demonstrate ability of facility personnel to deploy and operate equipment.

Ensure equipment is in proper working order.

Certification: Self-certification.

Verification: EPA.

Records:

Retention: 5 years.

Location: Records to be kept at the facility.

Evaluation Self–Evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Note: If a facility with facility owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO owned equipment.

Equipment Deployment Exercises

EPA-Regulated Facilities

Applicability: Facilities with OSRO response equipment cited in their response plan.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Facility owner or operator and OSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment as described in "Guiding Principles."

All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO equipment must be included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO is documented. The OSRO must provide inspection and maintenance information to the owner or operator.

Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each CG or EPA Contingency Planning Area, or EPA sub-area

(where identified).

Objectives: Demonstrate the ability of the personnel to deploy and operate response equipment.

Ensure the response equipment is in proper working order.

Certification: The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.

Verification: EPA.

Records:

Retention 5 years, kept at the facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Government-Initiated Unannounced Exercises

EPA—Regulated Facility Response Plan Holders

Applicability: EPA-regulated facility response plan holders within the region.

Frequency: Triennially, if successfully completed. A facility deemed by the CG/EPA not to have successfully completed the exercise may be required to participate in another government initiated unannounced exercise at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise).

Initiating Authority: EPA.

Partlcip. Elements: EPA-regulated facility response plan holders.

Scope: Unannounced exercises are limited to a maximum of 10% of response plan holders per EPA Region per year.

Exercises are limited to approximately 4 hours in duration.

Exercises should involve response to a small discharge scenario (assume 2,100 gallons outside secondary containment and discharged into or on navigable waters and adjoining shorelines).

Exercise would involve deployment of response equipment identified in the facility response plan to respond to spill scenario.

RSPA and MMS will cover unannounced exercises for pipelines and offshore facilities <u>not</u>

a part of a complex in their exercise programs.

Objectives: Conduct proper notifications to respond to unannounced scenario of a small discharge.

Demonstrate that the response is -

> Timely as defined in section 1 of these Guidelines;

> Conducted with adequate amount of equipment for scenario; and

> Properly conducted.

Certification: EPA.

Verification: EPA.

Records:
Retention: 5 years, kept at the facility.

Evaluation: Evaluation to be conducted by initiating agency.

Credit: Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises, if criteria for those exercises are met, the response is evaluated by the plan holder and a proper record is generated.

Section 5

Onshore Transportation-Related Pipelines

Owner or Operator Internal Notification Exercises

Onshore Transportation-Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum, consistent with the triennial cycle (quarterly).

Party Initiating Exercise: As indicated in response plan.

Participants: Facility response personnel and the facility's qualified individual.

Scope: Exercise notification process between key facility personnel and the qualified individual to demonstrate the accessibility of the qualified individual.

Objectives: Contact by telephone, radio, message-pager, or facsimile and confirmation established as indicated in response plan.

Format: As indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by Research and Special Programs Administration (RSPA) during regular inspections* or RSPA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Internal Tabletop Exercises

Onshore Transportation-Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum consistent with the triennial cycle (annually).

Party Initiating Exercise: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.

Objectives: Designated emergency response team members should demonstrate -

> Knowledge of facility response plan;

> Ability to organize team members to effectively interface with a unified command;

> Communication capability; and

> Coordination for response capability as outlined in response plan.

Format: Internal tabletop exercise as outlined in response plan.

Certification: Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document, whichever is more stringent. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by RSPA during regular

inspections* or RSPA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credits: Plan holders should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Owner/Operator Equipment Deployment Exercises

Onshore Transportation-Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum, as consistent with the triennial cycle (annually).

***The number of equipment deployment exercises should be such that equipment and personnel assigned to each response zone are exercised at least once per year. If the same personnel and equipment respond to multiple zones, they need only exercise once per year. If different personnel and equipment respond to various response zones, each must participate in an annual equipment deployment exercise.**

Party Initiating Exercises: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstrate ability to deploy spill response equipment* Identified in the FRP.

***May consist entirely of operator owned equipment, or a combination of OSRO and operator equipment.**

Objectives: Designated emergency response personnel should demonstrate---

> (1) Ability to organize; and

> (2) Ability to deploy and operate representative types of key response equipment as described in response plan.

Format: Announced deployment exercise indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by RSPA during regular inspections* or RSPA tabletop exercises.

***Verification will not be done by inspection in the near term.**

Records:

Retention: 3 years.

Location: Owner or Operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Unannounced Exercises

Onshore Transportation-Related Pipelines

Applicability: Pipeline owner/operator.

Frequency: Maximum of 20 unannounced RSPA exercises conducted annually for the pipeline industry as a whole. A single owner or operator will not be required to participate in a RSPA- initiated unannounced exercise, if they have already participated in one within the previous 36 months.

Party Initiating Exercise: RSPA.

Participants: Designated spill emergency response team members.

Operations staff.

On-Scene Coordinator (optional).

State and local government (optional).

Scope: Demonstrate ability to respond to a worst-case discharge spill event.

Objectives: Designated emergency response team members should demonstrate adequate knowledge of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan.

Format: Unannounced tabletop exercise to discuss strategic issues.

Operations will provide the owner or operator the following information at least 10 working days in advance (1) date, time, and location of exercise; (2) expected exercise duration; and (3) response zone to be exercised.

On the day of the exercise, the pipeline owner or operator will be provided the scenario and post-spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.

Certification: Certification can be effectuated by RSPA personnel conducting the exercise. RSPA will provide written certification of the exercise date, participants, and response zone exercised.

Verification: Verification can be made by RSPA personnel conducting the exercise.

Records:

Retention Time: 3 years.

Location: Owner or Operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Section 6

Offshore Facilities

Notification Exercises

Offshore Facilities

Applicability: Offshore facilities.

Frequency: Annual.

Initiating Authority: Owner or operator.

Participating Elements: Facility personnel and qualified individual.

Scope: Exercise and test communications between personnel on each facility manned on a 24-hour basis and qualified individual; information to be provided in the event of a spill must be simulated during this exercise.

Objectives: Voice contact must be made with the qualified individual.

Certification: Self-certification.

Verification: Verification by MMS inspection personnel during site visits.

Records:

Retention: 3 years.

Location: Records to be maintained at the facility or at a corporate location designated in the spill response plan.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

UNANNOUNCED EXERCISES

Offshore Facilities

Applicability: Offshore Facilities.

Frequency: Frequency will be determined by the Regional Supervisor. A facility will not face an agency unannounced exercise more than once per year, unless the results of previous exercises warrant more frequency.

Initiating Authority: MMS.

Participating Elements: Facility personnel, qualified individual, spill management team, oil spill removal organization (OSRO), state and local government and other federal agencies (optional).

Scope: Exercise will require that the owner or operator respond to a spill scenario posed by the MMS Regional Supervisor.

Objectives: Conduct proper notifications to respond to unannounced scenario.

Demonstrate ability to mobilize adequate equipment to respond to scenario.

Demonstrate ability to conduct timely deployment of equipment.

Demonstrate ability to conduct proper deployment to respond to scenario.

Certification: MMS.

Verification: Verification by MMS personnel.

Records:

Retention: 3 years.

Location: MMS will maintain records at the MMS Regional Office. The owner or operator will maintain records at a corporate location identified in the approved spill response plan.

Evaluation: Evaluation to be conducted by MMS.

Credits Plan holder may receive credit for other required exercises if the unannounced exercise is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

Spill Management Team Tabletop Exercise

Offshore Facilities

Applicability: Spill management team.

Frequency: Annually.

Initiating Authority: Owner or operator.

Participating Elements: Spill management team as established in response plan.

Scope: Exercise the spill management team annually.

Objectives: Exercise the spill management team's organization, communication, and decision-making in managing a spill response to an unannounced scenario.

Exercise the spill management team in a review of-

> Knowledge of response plan;

> Proper notifications;

> Communications system;

> Ability to access an OSRO;

> Coordination of OSRO containment and recovery activity;

> Coordination of organization or agency personnel with responsibility for spill response;

> Ability to effectively coordinate spill response activity with National Response System infrastructure; and

> Ability to access information in Area Contingency Plan for location of sensitive areas, resources available within the area, unique conditions of area, etc.

Certification: Self-certification.

Verification: Verification by MMS personnel.

Records:

Retention: 3 years.

Location: Records to be maintained at a corporate location designated in the spill response plan.

Evaluation: Self-evaluation. The MMS may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

Offshore Facilities-Equipment Staged Offshore

Applicability: OSRO or owner or operator response equipment required to be staged offshore.

Frequency: Semiannually.

Initiating Authority: OSRO, or owner or operator.

Participating Elements: Facility or OSRO personnel.

Scope: Deploy and operate response equipment that is required to be staged offshore and identified in the response plan. Each type of this equipment is to be deployed annually. Each type need not be deployed at each exercise. Credit will be given for any government-initiated deployment exercise or exercises initiated by OSRO member companies.*

Objectives: Demonstrate ability of spill response personnel to deploy and operate equipment.

Evaluate deployment strategies under various spill scenarios.

Certification: Self-certification (OSRO for OSRO equipment and owner or operator for owner or operator equipment).

Verification: Verification by MMS inspection personnel.

Records:

Retention: 3 years.

Location: Records to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.

Evaluation: Self-evaluation. The MMS may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***For exploratory wells being drilled from Mobile Offshore Drilling Units (MODUs), at least one deployment exercise will be conducted during drilling of each well, as directed by the Regional Supervisor, if staged response equipment is required by the Regional Supervisor.**

Equipment Deployment Exercises

Offshore Facilities – Equipment Staged Onshore

Applicability: OSRO, or owner or operator response equipment stored at an onshore location.

Frequency: Annually.

Initiating Authority: OSRO, or owner or operator.

Participating Elements: OSRO, or owner or operator personnel.

Scope: Deploy and operate response equipment that is stored onshore and identified in the response plan. Each type of equipment must be exercised during each triennial period. It is not necessary to deploy each piece of equipment.

Objectives: Demonstrate ability of spill response personnel to deploy and operate equipment.

Evaluate deployment strategies under various spill scenarios.

Certification: Self-certification (OSRO for OSRO equipment and owner or operator for owner or operator equipment).

Verification: Verification by MMS inspection personnel.

Records:

Retention: 3 years.

Location: Records to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.

Evaluation: Self-evaluation. The MMS may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Section 7

Area Exercises

Notification Exercise

Area

Applicability: Area.

Frequency: Quarterly.

Initiating Authority: On-Scene Coordinator.

Participating Elements: Key Elements of the unified command (appropriate federal, state and local government agencies).

Scope: Exercise and test communication between On-Scene Coordinator and key elements of the unified command.

Objectives: Ensure that the key elements of the unified command know whom to call in the event of a discharge within the area.

Ensure contact by telephone, radio, message-pager, or facsimile and confirmation is made between the On-Scene Coordinator and key elements of the unified command.

Certification: Self-certification.

Verification: Verification to be conducted by the District or Region.

Records:

Retention: 3 years (USCG).

5 years (EPA).

Location: With the On-Scene Coordinator.

Evaluation: By Area Committee.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all exercise objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Spill management Team Tabletop Exercise

Area

Applicability: Area spill management team.

Frequency: Annually.

Initiating Authority: U.S. Coast Guard District (m) or EPA Region.

Participating Elements: Spill management team for the area (U.S. Coast Guard or EPA and respective response team) and state(s).

Scope: Exercise the spill management team's organization, communication, and decision-making in managing a spill response.

Objectives: Exercise the spill management team in a review of

> Knowledge of the Area Contingency Plan;

> Proper notifications;

> Communications system

> Ability to access response equipment

> Coordination of organization or agency personnel with responsibility for spill response;

> Ability to effectively coordinate spill response activity with National Response System infrastructure;

> Ability to access information in Area Contingency Plan for location of sensitive areas, resources available within the area, unique conditions of the area, etc.; and

Exercise the response management system identified in the ACP and to the extent possible the unified command.

At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self- Certification.

Verification: Verification to be conducted by District or Region.

Records

Retention 3 years (USCG).

5 years (EPA).

Location: With On-Scene Coordinator.

Evaluation: Self-evaluation.

Credit: Credit should be taken for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

Area

Applicability: Area Committee.

Frequency: Annually.

Initiating Authority: On-Scene Coordinator.

Participating Elements: Local area response community (appropriate federal, state and local response agencies).

Scope: Deploy and operate Coast Guard and EPA "first aid" response equipment and the Coast Guard's prepositioned equipment. All of the "first aid" equipment or that which is necessary to respond to an average most probable discharge in the Area, whichever is less, should be deployed annually.

All response personnel must be included in a comprehensive training program, and all response equipment in a comprehensive maintenance program. Credit should be taken for deployment of equipment during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices.

Objectives: Demonstrate the ability of the response personnel to deploy and operate the equipment.

Ensure that the response equipment is in proper working order.

Certification: Self-certification.

Verification: District or Region.

Records:

Retention: 3 years (USCG).

5 years (EPA).

With On-Scene Coordinator.

Evaluation: Self-evaluation.

Credits: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Area Exercises

Area

Applicability: Area Response community.

Frequency: Triennially for each area.

Initiating Authority: U.S. Coast Guard, EPA and Industry.

Participating Elements: Appropriate Federal, state, and local government, and industry and other members of the response community.

Scope: Area exercises will exercise the Area Response Community.

Objectives: Exercise the Area Contingency Plan, along with selected industry response plans.

Exercise the response management system identified in the ACP and, to the extent possible, the unified command with the appropriate participants.

Exercise the area and industry spill management teams.

Deploy adequate response equipment for the exercise scenario. At a minimum, the scenario must involve exercise of Tier I Worst Case discharge capability.

Format: Total annual exercises would consist of the following-

> 6 government-led exercises; and

> 14 industry-led.

Total = 20 Area Exercises Per Year.

Area exercises should be *approximately* 8 - 12

hours in duration.

Exercise scenario to be developed by the exercise design team.

To simulate realism, the exercise should be conducted in the command post that would be utilized for a spill response, whenever possible.

Exercise may be in real or limited compressed time, and may start at any point during an incident, as determined by the Exercise Design Team. Flexibility should be allowed, to ensure the exercise objectives are met.

Lessons learned from the exercise should be incorporated into the PREP Lessons Learned System (e.g., CGSAILS), whenever possible.

Certification: The On-Scene Coordinator will certify completion of the area exercise. In certifying the area exercise, the On-Scene Coordinator will consider the following-

> The area exercise was conducted.

> The area exercise met the objectives outlined in the PREP guidelines.

> The area response community was exercised for spill response preparedness.

Industry plan holders should take credit for all of the exercises completed during the area exercise. These exercises shall be self-certified by the plan holder.

Verification: Verification to be done by the National Scheduling Coordinating Committee.

Records

Retention: 3 years (USCG).

5 years (EPA).

Location: On Scene Coordinator.

Evaluation: Joint evaluation team to be comprised of the federal government (U.S. Coast Guard, EPA, RSPA or MMS) state and industry.

Scheduling: Scheduling of area exercises will be done by the NSCC, utilizing input from the On-Scene Coordinator, Area Committee and Regional Response Team, in consultation with the industry. A 3-year schedule of PREP Area exercises will be published in the federal register as a public forum for government and industry input to the scheduling process.

Appendix A: Internal Exercise Documentation Forms

The following sample documentation forms are provided to give plan holders an idea of how to document the internal PREP exercises. These sample forms, are provided only as guidance. Plan holders do not have to include all of the information presented on these forms nor do they have to use these exact forms. Plan holders may choose to develop their own forms. Documentation should be completed within 60 days of exercise completion. Documentation should include, as a minimum, the following information:

- The type of exercise;
- Date and time of the exercise;
- A description of the exercise;
- The objectives met in the exercise;
- The components of the response plan exercised; and
- Lessons learned along with procedures and schedules for implementing lessons learned.

Internal Exercise Documentation Form

Notification Exercise

1. Date performed:_____

2. Exercise or actual response?_____

3. Vessel/Facility/Pipeline/Offshore Facility initiating exercise: _____

4. Name of person notified_____
   Is this person identified in your response plan as qualified individual Or designee?_____

5. Time initiated: _____
   Time in which qualified individual or designee responded _____

6. Method used to contact:
   ____Telephone
   ____Pager
   ____Radio
   ____Other _____

7. Description of notification procedure:
   _____
   _____
   _____
   _____
   _____

8. Identify which of the 15 core components of your response plan were exercised during this particular exercise:
   _____
   _____
   _____
   _____

_____
Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) or 5 years (for EPA).

For vessel qualified individual notification, ensure log entry is also made and retained for a minimum of 3 years.

Internal Exercise Documentation Form

Emergency Procedures Exercise

1. Date performed: _____

2. Exercise or actual response ? _____
   If an exercise, announced or unannounced? _____

3. Location: _____

4. Vessel/Barge/Facility name: _____

5. Time started: _____
   Time completed: _____

6. Sections of Vessel/Barge/Facility emergency procedures exercised (i.e., response to collision, response to oil spill on deck, response to vessel fire, etc.)? _____
   _____
   _____
   _____

7. Description of exercise: _____
   _____
   _____
   _____

8. Identify which of the 15 core components of your response plan were exercised during this particular exercise: _____
   _____
   _____
   _____
   _____
   _____

Emergency Procedures Exercise (continued)

9. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

_____
Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) and 5 years (for EPA).

For manned vessels, ensure log entry is made and retained for 3 years.

Internal Exercise Documentation Form

Spill Management Team Tabletop Exercise

1. Date(s) performed: _____

2. Exercise or actual response? _____
If an exercise, announced or unannounced? _____

3. Location of tabletop: _____

4. Time started: _____
Time completed: _____

5. Response plan scenario used (check one):
_____Average most probable discharge
_____ Maximum most probable discharge
_____ Worst case discharge
_____ Size of (simulated) spill-bbls/gals

6. Describe how the following objectives were exercised:

a) Spill management team's knowledge of oil-spill response plan:
_____
_____
_____
_____
_____
_____

b) Proper notifications:
_____
_____
_____
_____
_____
_____

c) Communications system:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

d) Spill management team's ability to access contracted oil spill removal organizations:

_____
_____
_____
_____
_____
_____
_____
_____

e) Spill management team's ability to coordinate spill response with On-Scene Coordinator, state and applicable agencies:

_____
_____
_____
_____
_____
_____
_____
_____

f) Spill management team's ability to access sensitive site and resource information in the Area Contingency Plan:

_____
_____
_____
_____

_____
_____

7. Identify which of the 15 core components of your response plan were exercised during this particular exercise:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

8. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

_____
Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) or 5 years (for EPA).

Internal Exercise Documentation Form

Equipment Deployment Exercise

1. Date(s) performed: _____

2. Exercise or actual response? _____
   If an exercise, announced or unannounced? _____

3. Deployment location(s):

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

4. Time started: _____
   Time OSRO/HSRO called_____
   Time on-scene_____
   Time boom deployed_____
   Time recovery equipment arrives on-scene_____

   Time completed: _____

5. Equipment deployed was:
_____Facility-owned
_____OSRO/HSRO-owned if so, which OSRO/HSRO?_____
_____Both

Equipment Deployment Exercise (continued)

6. List type and amount of all equipment (e.g., boom and skimmers) deployed and number of support personnel employed:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

7. Describe goals of the equipment deployment and list any Area Contingency Plan strategies tested. (Attach a sketch of equipment deployments and booming strategies):

_____
_____
_____
_____
_____
_____
_____

8. For deployment of facility-owned equipment, was the amount of equipment deployed at least the amount necessary to respond to your facility's average most probable spill?

_____
_____

   Was the equipment deployed in its intended operating environment?

_____
_____
_____
_____
_____

Equipment Deployment Exercise (continued)

9. For deployment of OSRO/HSRO-owned equipment, was a representative sample (at least 1000 feet of each boom type and at least one of each skimmer type) deployed?

_____
_____
_____
_____

Was the equipment deployed in its intended operating environment?

_____
_____
_____

10. Are all facility personnel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? _____

_____
_____
_____

If so, describe the program:_____

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Date of last equipment inspection: _____

11. Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill? _____

12. Was all deployed equipment operational? If not, why not?

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

13. Identify which of the 15 core components of your response plan were exercised during this particular exercise: _____

_____
_____
_____
_____
_____
_____
_____
_____

14. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

_____
Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (for USCG/RSPA/MMS) or for a minimum of 5 years (for EPA).

Triennial CYLCLE Documentation FORM

													Core Components														
					Year								Notification	Staff Mobilization	Operate in RMS	Discharge Contained	Assessment	Containment	Recovery	Protection	Disposal	Communications	Transportation	Personnel Support	Equipment Maint.	Procurement	Documentation
	CY				CY				CY																		
	Quarters				Quarters				Quarters																		
	1	2	3	4	5	6	7	8	9	10	11	12															
QI Notification																											
Emergency Procedures																											
SMT Tabletop																											
Equipment Deployment																											
OSRO/HSRO Equipment Deployment																											
Gov't-initiated Unnannounced																											
Area Exercise																											

For each quarter in which an exercise was completed, mark that with an "X" then mark each core component tested during an exercise.

APPENDIX B:
RESPONSE PLAN CORE COMPONENTS

During each triennial cycle, all components of a plan holder's response plan must be exercised at least once. The purpose of this requirement is to ensure that all plan components function adequately for response to an oil spill.

The 15 core components listed below are the types of components that must be exercised. However, these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

1. Notifications: Test the notifications procedures identified in the Area Contingency Plan and the associated Responsible Party Response Plan.

2. Staff Mobilization: Demonstrate the ability to assemble the spill response organization identified in the Area Contingency Plan and associated Responsible Party Response Plan.

3. Ability to Operate Within the Response Management System Described in the Plan:

   3.1 **Unified Command:** Demonstrate the ability of the spill response organization to work within a unified command

   3.1.1 Federal Representation: Demonstrate the ability to consolidate the concerns and interests of the other members of the unified command into a unified strategic plan with tactical operations.

   3.1.2 State Representation: Demonstrate the ability to function within the unified command structure.

   3.1.3 Local Representation: Demonstrate the ability to within the unified command structure.

   3.1.4 Responsible Party Representation: Demonstrated(to function within the unified command structure

3.2. **Response Management System:** Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.

3.2.1 Operations: Demonstrate the ability to coordinate or direct operations related to the implementation of action plans contained in the respective response and contingency plans developed by the unified command.

3.2.2 Planning: Demonstrate the ability to consolidate the various concerns of the members of the unified command into joint planning recommendations and specific long-range strategic plans. Demonstrate the ability to develop short-range tactical plans for the operations division.

3.2.3 Logistics: Demonstrate the ability to provide the necessary support of both the short-term and long-term action plans.

3.2.4 Finance: Demonstrate the ability to document the daily expenditures of the organization and provide cost estimates for continuing operations.

3.2.5 Public Affairs: Demonstrate the ability to form a joint information center and provide the necessary interface between the unified command and the media.

3.2.6 Safety Affairs: Demonstrate the ability to monitor all field operations and ensure compliance with safety standards.

3.2.7 Legal Affairs: Demonstrate the ability to provide the unified command with suitable legal advice and assistance.

4. **Source Control:** Demonstrate the ability of the spill response organization to control and stop the discharge at the source.

   4.1 Salvage: Demonstrate the ability to assemble and deploy salvage resources identified in the response plan.

   4.2 Firefighting: Demonstrate the ability to assemble and deploy the firefighting resources identified in the response plan.

4.3 Lightering: Demonstrate the ability to assemble and deploy the lightering resources identified in the response plan.

4.4 Other salvage equipment and devices: (electrical and manual controls and barriers to control the source) Demonstrate the ability to assemble and deploy the other salvage devices identified in the response plan

5. **Assessment:** Demonstrate the ability of the spill response organization to provide an initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations.

6. **Containment:** Demonstrate the ability of the spill response organization to contain the discharge at the source or In various locations for recovery operations.

7. **Recovery:** Demonstrate the ability of the spill response organization to recover, mitigate, and remove the discharged product. Includes mitigation and removal activities, e.g. dispersant use, ISB use, and bioremediation use.

   7.1 On-Water Recovery: Demonstrate the ability to assemble and deploy the on-water response resources identified In the response plans.

   7.2 Shore-Based Recovery: Demonstrate the ability to assemble and deploy the shoreside response resources identified in the response plans.

8. **Protection:** Demonstrate the ability of the spill response organization to protect the environmentally and economically sensitive areas identified in the Area Contingency Plan and the respective industry response plan.

   8.1 Protective Booming: Demonstrate the ability to assemble and deploy sufficient resources to implement the protection strategies contained in the Area Contingency Plan and the respective industry response plan.

8.2 Water Intake Protection: Demonstrate the ability to quickly identify water intakes and implement the proper protection procedures from the Area Contingency Plan or develop a plan for use.

8.3 Wildlife Recovery and Rehabilitation: Demonstrate the ability to quickly identify these resources at risk and implement the proper protection procedures from the Area Contingency Plan to develop a plan for use.

8.4 Population Protection (Protect Public Health and Safety): Demonstrate the ability to quickly identify health hazards associated with the discharged product and the population at risk from these hazards, and to implement the proper protection procedures from the Area Contingency Plan or develop a plan for use.

9. **Disposal:** Demonstrate the ability of the spill response organization to dispose of the recovered material and contaminated debris.

10. **Communications:** Demonstrate the ability to establish an effective communications system for the spill response organization.

    10.1 Internal Communications: Demonstrate the ability to establish an intra-organization communications system. This encompasses communications at the command post and between the command post and deployed resources.

    10.2 External Communications: Demonstrate the ability to establish communications both within the response organization and other entities (e.g., RRT, claimants, media, regional or HQ agency offices, non-governmental organizations, etc.).

11. **Transportation:** Demonstrate the ability to provide effective multi-mode transportation both for execution of the discharge and support functions.

    11.1 Land Transportation: Demonstrate the ability to provide effective land transportation for all elements of the response.

11.2 Waterborne Transportation: Demonstrate the ability to provide effective waterborne transportation for all elements of the response.

11.3 Airborne Transportation: Demonstrate the ability to provide the necessary support of all personnel associated with the response.

12. **Personnel Support:** Demonstrate the ability to provide the necessary support of all personnel associated with the response.

12.1 Management: Demonstrate the ability to provide administrative management of all personnel involved in the response. This requirement includes the ability to move personnel into or out of the response organization with established procedures.

12.2 Berthing: Demonstrate the ability to provide overnight accommodations on a continuing basis for a sustained response.

12.3 Messing: Demonstrate the ability to provide suitable feeding arrangements for personnel involved with the management of the response.

12.4 Operational and Administrative Spaces: Demonstrate the ability to provide suitable operational and administrative spaces for personnel involved with the management of the response.

12.5 Emergency Procedures: Demonstrate the ability to provide emergency services for personnel involved in the response.

13. **Equipment Maintenance and Support:** Demonstrate the ability to maintain and support all equipment associated with the response.

13.1 Response Equipment: Demonstrate the ability to provide effective maintenance and support for all response equipment.

13.2 Response Equipment: Demonstrate the ability to provide effective maintenance and support for all equipment that supports the response. This requirement includes communications equipment, transportation equipment, administrative equipment, etc.

14. **Procurement:** Demonstrate the ability to establish an effective procurement system.

14.1 Personnel: Demonstrate the ability to procure sufficient personnel to mount and sustain an organized response. This requirement includes insuring that all personnel have qualifications and training required for their position within the response organization.

14.2 Response Equipment: Demonstrate the ability to procure sufficient response equipment to mount and sustain an organized response.

14.3 Support Equipment: Demonstrate the ability to procure sufficient support equipment to support and sustain an organized response.

15. **Documentation:** Demonstrate the ability of the spill response organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken