

# **PACIFIC STATES/BRITISH COLUMBIA OIL SPILL TASK FORCE**

**DRILLS and EXERCISES  
Project Report and  
Recommendations  
1995**

Submitted to the:

Province of British Columbia  
State of Alaska  
State of Washington  
State of Oregon  
State of California

## EXECUTIVE SUMMARY

Pursuant to our 1994-1999 Strategic Plan and the Annual Workplans for 1993-1994 and 1994-1995, a workgroup chaired by the California Office of Spill Prevention and Response has been working on analysis and coordination of member agency drill and exercise programs, both within the Task Force and with federal agency programs.

This "Drills and Exercises Project Workgroup" reviewed individual drill and exercise program requirements and found them consistent with one another and with the U.S. National Preparedness for Response Exercise Program (NPREP). The workgroup has also served as a forum for information exchange regarding development of the Canadian National Exercise Program (NEP), drill schedules and events, regarding unified command/incident command system training opportunities, and regarding implementation of drill and exercise policies and programs.

As requested by the Task Force Members, the workgroup has developed consensus recommendations on guidelines for granting substitute credits to contingency plan holders for drills or spill responses conducted in one Task Force Member jurisdiction which could satisfy a portion of their drill/exercise obligations in another Member's jurisdiction. Although contingency plan holders are more likely to have common operations among the U.S. jurisdictions, a few operators may request reciprocal credit procedures be applied in British Columbia as well.

These procedural recommendations would apply to deployment of applicable equipment or management teams, and would require the plan holder to request substitute credit 90 days in advance and have received approval from both the member agency granting credit and the member agency providing documentation; to invite all appropriate agencies to attend; to meet all substitute credit documentation requirements, including submittal to the agency granting credit; to conduct the response according to the contingency plan as approved by the agency conducting the drill/exercise; and to have a drilling agency evaluator present wherever possible, or if not possible, an independent third party, or if these cannot be arranged, use the approved forms to conduct a self-evaluation. Credit for actual spill response can only be given if a state/provincial or federal agency representative conducts the evaluation.

The recommended procedure would require that member agencies respond to applications for prior approval within 30 days and make every possible effort to provide an evaluator at drill events. Member agencies retain the option to deny an application for substitute credit, however, if it is in the best interest of their jurisdiction to do so. For example, it is important that enough drills occur in each jurisdiction that response contractors and plan holders are familiar with local conditions and local

agency contacts. It is the intention of the workgroup that such concerns will be weighed and balanced in such a way that the spill response capability on the West Coast is enhanced.

Towards that continuing goal, the group also recommends that it be reconvened periodically to review implementation of these recommendations and to continue to serve as a forum for information exchange.

## **PROJECT BACKGROUND**

When the States/British Columbia Oil Spill Task Force Members adopted the 1994-1999 Strategic Plan, one of our primary objectives was to enhance response capabilities on the West Coast, with an emphasis on consistency and effectiveness. One of the initial priorities for analysis and coordination has been drills and exercises, particularly agency involvement and reciprocity of credit.

Consistent with Task Force procedure, one of our member agencies volunteered to provide leadership on this project: the Office of Spill Prevention and Response of the California Department of Fish and Game. Other member agencies have participated, as have interested stakeholders representing response organizations, contingency plan holders, and the U.S. Coast Guard. A list of project workgroup participants can be found in Attachment A.

That workgroup was formed in early 1994 and reported to the Members at their 1994 Annual Meeting that they had completed the following tasks:

- Developed and adopted a workplan;
- Reviewed their individual drill and exercise program requirements and found them consistent with one another and with the proposed U. S. National Preparedness for Response Exercise Program (NPREP)(See Attachment B);
- Provided a forum for review and coordination of drill and exercise schedules; and
- Provided a forum for information exchange regarding Unified Command and Incident Command System training programs.

Both the coordination and information exchange functions have continued through the 1994-1995 Task Force work year and should continue as an on-going function of this group into the near future, with a focus not only on the U.S. NPREP program, but also on implementation of the Canadian National Exercise Program

(NEP) as well. Canadian regulations will require oil handling facilities and response organizations to have exercise programs; the Canadian Coast Guard is developing and promoting a National Exercise Program and expect Canadian industry to participate. The Canadian Coast Guard has stated that NEP and NPREP are compatible.

In addition to this coordination function, the workgroup has focused on developing recommendations covering guidelines for granting substitute credit to contingency plan holders for drills or spill responses conducted in one Oil Spill Task Force member jurisdiction which could satisfy a portion of their drill/exercise obligations in another Task Force member jurisdiction. Doing so can relieve the pressure on both private and public resources to meet redundant obligations, while maintaining an adequate readiness posture and assuring that plan holders and their response contractors are familiar with all local conditions, regulations, and personnel on the West Coast.

## **RECOMMENDATIONS**

The drill and exercise substitute credit procedures recommended below are intended to apply to all regulated oil handling facilities, covered vessels, and response contractors who request substitute credit from a Task Force Member Agency for an oil spill drill conducted within another States/British Columbia Oil Spill Task Force Member jurisdiction (Alaska, British Columbia, Washington, Oregon, and California).

Drills are not evaluated on a pass or fail basis, since there is always value in conducting a drill. Plan holders are asked to demonstrate their ability to successfully complete the objectives described in the NPREP Guidelines Document as a measurement of their ability to implement their oil spill contingency plan. Unsatisfactory performance or contingency plan deficiencies noted during a drill evaluation are to be corrected at the next scheduled drill. Failure to correct deficiencies to the satisfaction of the state, province, or federal evaluator may result in no credit for the drill.

The States/British Columbia Oil Spill Task Force Drills and Exercises Project Workgroup offers the following consensus recommendations to Task Force Members:

**I. A drill or spill response meeting NPREP requirements for U.S. operators or NEP requirements for Canadian operators should be eligible to receive substitute credit among Task Force member agencies according to the following guidelines:**

1. The drill tests one or more of the following:
  - a) A spill management team - the plan holder's spill management team or a contracted spill management team - that would be deployable to a spill in the jurisdiction from which credit is requested;
  - b) Equipment that would be deployed for spill response or provide services in the jurisdiction from which credit is requested;
  - c) Cascadable response resources, as identified in a contingency plan, Area Plan, Mutual Aid plan, or Regional Response Resource Manual; and
2. The drill is conducted within a jurisdiction which has signed this agreement, and
3. The contingency plan holder has invited all appropriate agencies to attend; and
4. The plan holder or response organization has received prior approval for substitute drill credit from all appropriate agencies (Substitute drill credit requests must be made 90 days in advance of the drill. The state or province receiving the request should take no more than 30 days to approve or deny the request.); and
5. The plan holder or response organization meets all substitute credit documentation requirements of the agency from which they seek credit. Documentation is required for either drills or actual spill responses conducted in another state or province; and
6. The plan holder or response organization submits all appropriate documentation to the agency from which substitute drill credit is requested; and
7. The drill or spill response follows the approved oil spill contingency plan; and
8. Evaluation forms or checklists developed for NPREP in the U.S. (See Attachment C) or the NEP in Canada are used. If local checklists or evaluation forms are more extensive in detail than those recommended here, they may be substituted; and
9. Member agencies will make every effort to have an evaluator present at a

scheduled exercise. If neither a state, province, nor federal agency evaluator is able to attend the drill, an evaluation conducted by an independent third party is the preferred method of documentation; however, a self evaluation conducted using the approved federal evaluation forms may be accepted. Actual spills must be evaluated by a state, provincial, or federal agency in order for the plan holder's response to be considered for substitute credit.

10. Substitute credit issuance or denial is always at the option of the Oil Spill Task Force member agency from whom the credit is requested.

**II. Continue to use the Drills and Exercises Project Workgroup as a forum for information exchange regarding: 1) drill and exercise scheduling; 2) implementation of U.S. and Canadian national exercise programs; 3) unified command and incident command system training opportunities; 4) implementation of the recommendations above; and 5) possible integration of other jurisdictions into this agreement.**

Relying upon the continued leadership of the California Office of Spill Prevention and Response, convene the workgroup semi-annually or more frequently if necessary.

## **ATTACHMENT A**

### **States/British Columbia Oil Spill Task Force Drills and Exercises Project Workgroup**

#### Workgroup Leaders\*

Bob Sands, California Office of Spill Prevention and Response

Jack Geck, California Office of Spill Prevention and Response

\* (Special thanks to Rob Floerke and Lisa Luhnnow of OSPR, who provided initial leadership)

#### Task Force Agency Workgroup Members

Chris Pace and Larry Iwomoto, Alaska Department of Environmental Conservation

Jack Wylie, Oregon Department of Environmental Quality

Stafford Reid, British Columbia Ministry of Environment, Lands, and Parks

Ron Holcombe, Washington Department of Ecology

Roy Robertson, Washington Office of Marine Safety

Stakeholder Workgroup Members

Joe Haley, Texaco Refining & Marketing, inc.

Skip Onstad and Dave McLain, Marine Spill Response Organization

Carl Fritzsche, Chevron Shipping Company

Karen Sahatjian, U.S. Coast Guard

Jim Zess, Zess Engineering and Environmental Science

**Copies of the following attachments are available only in hard copy:**

B. Comparison of US State and Federal Drill Requirements (1995)

C. Drill Credit Evaluation Checklist Form (1995)