

Pacific States/British Columbia Oil Spill Task Force

Drills and Exercises Program Comparison Across Task Force Jurisdictions



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AUTHORITIES						
Where does your drills and exercises authority lie? (include links to regs, etc.)	Alaska Statutes: AS 46.04.030 ; AS 46.04.055 ; AS 46.04.200 ; AS 46.04.210 Alaska Regulations: 18 AAC 75.485 ; 18 AAC 75.565	Environmental Management Act: https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03053_00 Division 2.1: https://www.bclaws.gov.bc.ca/civix/document/id/lc/statreg/03053_08#division_d1e15939 Spill Contingency Planning Regulation: http://www.bclaws.ca/civix/document/id/complete/statreg/186_2017	<u>Marine Drills</u> , Title 14, CCR, Division 1, Subdivision 4, OSPR Chapter 3, Oil Spill Contingency Plans, Section 820.01: http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=19635&inline <u>Inland Drills</u> , Title 14, CCR, Division 1, Subdivision 4, OSPR Chapter 3, Oil Spill Contingency Plans, Section 820.02: http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=163301&inline	HRS 128D	ORS 468b.300 OAR 340-141	Revised Code of Washington 90.56 and 88.46; Washington Administrative Code 173-182 and 173-186 (railroads), 173-180 (mobile facilities)
GENERAL INFORMATION [FOR EACH STATE/PROV]						
Sector(s) required to hold drills (vessel, railroad, trucks, facilities)	Note: ADEC may require drills / exercises, and typically we do. But there is not a minimum number of exercises to be performed for any sector. Crude Oil Transmission Pipelines; Exploration Facilities; Production Facilities; Terminal	Pipeline, Rail, Highway transporters (That transport specified petroleum products. Pipeline: any quantity Rail/Highway 10,000 litres or more)	Vessels, Facilities (Marine/Inland), Production Fields, Platforms, Offshore Facility (oil island), Pipelines, Railroads, Small Marine Fueling Facilities,	We currently do not require drills.	Vessel, Facilities, Pipelines & High Hazard Railway operators	Large oil-handling facilities that transfer oil over a dock, or to/from a pipeline. This means: oil terminals and refineries; Hazardous liquids pipelines (oil pipelines); Tank vessels regardless of gross tonnage; Fishing and cargo vessel (300 gross

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	Facilities; Tank Farms with over 420,000 gallons of refined oil or over 210,000 gallons of crude oil capacity; Crude and Noncrude Tank Vessels; Crude and Noncrude Barges; Nontank Vessels; railroad tank cars;		Mobile Transfer Units.			tons or more and involved in commerce); Passenger vessels of 300 gross tons or more with a fuel capacity of 6,000 gallons or more; Railroads transporting oil of any kind as bulk cargo; Mobile facilities that fuel regulated commercial vessels (have yet to initiate a drill program for mobiles); Railroads moving oil in bulk (both crude and refined products).
Number of plan holders	Oil discharge prevention and contingency plans: 76 plan holders; Nontank Vessel plans: 200 + but the number varies seasonally.	210	(Based on 2018 data) Approximately: Vessel 1,272, Marine Facility 48, Inland Facility 22, Lease/Production Field 12, Offshore Facility (oil island) 1, Pipeline 22, Railroad 12, Small Marine Fueling Facility 12, Mobile Transfer Unit 19.	No data collected	17 (not representative of actual number of vessels/facilities because enrolling large numbers under a single plan is allowed)	57 plans (not representative of actual number of vessels/facilities because enrolling large numbers under a single plan is allowed).

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Number of drills held per year	Variable. 2018: 35 regulated operator exercises in 2018. Also 2 CBRNE Exercises and 1 COOP (Continuity of Operations Plan) Exercise	420	178 In state drills (2018)	Variable; State participates in industry, and federal-led drills	8-15	95 – 125, varies because plan holders have different triennial cycles.
Number of plans	131 active oil discharge prevention & contingency plans; 231 Nontank Vessel Streamlined plans	210	Approximately 1,420 (2018 data)	Unknown	23	57 (not representative of actual number of vessels/facilities because enrolling large numbers under a single plan is allowed)
TYPES OF DRILLS/EXERCISES [PLAN HOLDERS]						
Scheduled Equipment Deployment (SED) – field deployment	11 (2018)	210 per year	55 (drill year 2018)	No data compiled	2 per year required per facility	63 per year (more than one plan holder may get credit for a single drill)
Table-top (TTX) Operations-based exercises	27 (2018)	210 per year	123 (drill year 2018)	31 (drill year 2018)	8-15 per year	30 per year
Wildlife drills/exercises			Once every 3 years		Once every 3 years	Once/year usually
Multi-customer drills for non-tank vessels	0 (2018)	N/A	Approximately 3-4 contracted Spill Management Team Drills every year; SMT represent various plan holders.	No data compiled	Allowed	1-2 drills in the area per 3 year cycle.

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Worse-case drills/exercises	1 (2018) Note: We typically look at whether a facility conducts a Response Planning Standard (RPS) Exercise. RPS exercises are based on the individual facility's required RPS, and that amount may be greater or less than an Area Plan Worst Case Discharge.	7 over a three-year period. Worst-case scenario exercises are only required by pipeline and rail.	123 over 3 year cycle. Drilled as Reasonable Worst Case Discharge exercises.	About three a year	About 6-11 per year	10-12 per year
Unannounced drills (indicate types)	Yes – we hold them, but sparingly and as the need dictates. There were more unannounced exercises in 2018 to test the readiness and capability of the new crude oil tanker escort tugs and response barge operators in Prince William Sound.	No	Participate in USCG GIUE drills, approximately 4 per year per USCG sector. Total 12 per year. Also participate in 2 BSEE unannounced drills per year, drills held on oil production platforms in Federal waters. DFW-OSPR is currently updating unannounced drill program.	Participate in industry and federal government (about once a year)	4 per year (All equipment Deployment)	Could be deployment or tabletop, at discretion of ecology
Pass/fail consequence (fine, re-drill, etc.)	If we determine the plan response strategies were not executed adequately or if it demonstrated a planning gap, the plan holder may be required	No	Pass/Fail only allowed for SEDs. Must complete all objectives to pass. If fail, plan holder given opportunity to retest SED. A letter of “must	N/A	Letter of Warning: must re-drill within 6 months.	Re-drill, order to correct, penalty for non-compliance

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	to conduct additional exercises and/or amend their contingency plan. In extreme cases we may implement procedures to revoke, suspend, or amend the plan.		drill again” sent to plan holder based on failing. Typically plan holder passes the 2nd time. If fail the 2nd time a fine would be issued and plan holder would need to eventually pass the SED.			
Out of state drills (for credits)	N/A	No	Accepted for vessel drills who drill once every 3 years within the State of California.	N/A	Accepted, but plan holder must inform us first	Vessel companies only 1 per year
Real spill incidents	When a real spill incident occurs, we may excuse a plan holder from a planned exercise if the real response covered comparable response actions and decision making processes as those planned for the exercise.	A worst-case scenario test is not required in a three-year period by regulated persons that faced a worst-case scenario spill during that time.	Spill credit can be issued once every 3 years to a plan holder. Plan holder must submit request within 60 days of the spill response and supply all supporting documentation to received specific objective credit.	N/A	May count towards equipment deployment exercises and occasionally an annual tabletop	Varies – only a few ask for credit from a spill, 1-2/year
Other (e.g. umbrella plan-holders)	N/A	No	We do have fleet plans for some vessel plans.	N/A	2. MFSA and Coos bay Response Cooperative	Two unique plan structure (“umbrella”) enroll thousands of vessels. One plan submitted by response contractor (OSRO) enrolling all their customers under a single plan

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ROLES DURING DRILL/EXERCISES	IMT positions we prioritize: State On-Scene Coordinator, Environment Unit, Liaison Officer, and Joint Information Center. Field positions we prioritize are SOSCr (SOSC representative); We also prioritize Evaluators for exercises. To the extent available DEC or other State staff are available, we assign staff to the Planning Section, Operations Section, Situation Unit as DEC's oversight leads.	Roles the BC Ministry of Environment and Climate Change Strategy may take during an exercise: Unified Command, Environmental Unit Lead, Liaison Officer, Information Officer, Safety Officer, Recovery, Sampling, SCAT, Waste Management Plans, Situation Unit Lead, Logistics Section Chief, Planning Section Chief, Operations Section Chief and other positions as needed.	During drills DFW-OSPR provides a minimum of 1 evaluator. Additional staffing can include multiple evaluators, and staffing of ICS positions such as SOSC, EUL, Resources at Risk, SCAT, ART, LOFR, PIO, Volunteer Coordinator, Wildlife Branch Director, DOCL, SOFR, and other positions as needed.	State On-Scene Coordinator	SOSC, PIO, LOFR, EUL are required in a WCD. We staff other sections too for practice for real incidents, such as LSC & FSC, usually as deputies.	

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How does your organization participate in drills/Ex? (List core lead roles of agency.)	Key positions that DEC always seeks to fill are those of SOSC and State representatives in the EU, JIC, and as a Liaison Officer. After that, DEC will staff as many positions as the scenario dictates. The goal is to staff appropriate to conduct our oversight role to ensure response effectiveness and to provide guidance and assistance in a manner that elevates the effectiveness and success of the exercise for all participants. We intend to participate as we would in a real event to the extent possible. We also have separate evaluators who are not players but who specifically evaluate against the exercise objectives and whether their performance demonstrates their oil discharge prevention and contingency plan is adequate and they can implement it (within the brackets of exercise objectives.		DFW-OSPR core lead roles are: SOSC, LOFR, EUL, SCAT, DOCL, Volunteer Coordinator, and Wildlife Branch Director. Other roles we typically staff are Resources at Risk, SCAT, ART, PIO, SOFR, and any other positions as needed.	As much our schedule allows, we participate in drill/Ex, Key position is to fill the State On-Scene Coordinator position. We intend to participate as we would normally in a real event.	DEQ helps plan exercises with plan holders. We require DEQ hold the roles of SOSC, PIO, Liaison and EUL	ECY manages the Area Plan Calendar and staffs drill design, Drill Evaluation, and SMT participation such as SOSC, Deputies, PIO, EU Leader/staff, LNO, JIC Lead/ Staff, LOFR Staff, Safety, Legal, Finance, Salvage, NRDA, Investigation, Operations, and ICS coaches

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What role(s) does industry take?	Industry (plan holders) fill the role of the Responsible Party in an exercise. They staff the Incident Commander, Planning Section Chief; Environment Unit Lead; OPS Section Chief; Logistics Section Chief; Finance Section Chief; and often key staff positions including Liaison Officer and Joint Information Center Lead. RP and/or Response Action Contractor staff fill many subordinate positions in the IMT as well as field positions. Some plan holders use IMT contractors but others use direct plan holder staff to fill IMT positions.	Unified Command and they are responsible for filling all required roles not taken by province or feds.	Plan holders are responsible for all roles needed to meet the drill objectives. If DFW-OSPR is the lead in an ICS position it is expected that the plan holder will have a deputy, assistant, or other subject matter expert to support the position with DFW-OSPR.	If it is an industry-led exercise, industry fully staffs the ICS organization. The intent is to fill the positions as in a real event.	All other roles except wildlife. They may hire contractors to fill roles if that is in their spill plan.	Industry is required to fully staff the ICS organization except where unique area plan policies call for an agency to lead (JIC, Liaison, EU), and SOSC/Deputy
Is there a role for Tribes for First Nations?		Unified Command. Can also contribute in other areas such as Planning (EU, SCAT), Operations, Logistics.	Tribes work through LOFR and PSC. Can staff positions in Planning (within EU) and Operations to support SCAT teams cleanup activities.	Liaison or Environmental Unit.	Yes, they may participate in any role. Typically Liaison or Environmental Unit: Cultural Resource Specialist	Yes – Tribes may hold any role they choose. Typically Tribal OSC, Liaison, Environmental Unit, Operations (field and command post).

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Is there a role for volunteers?	No	No	The role of volunteers is managed through Volunteer Unit. Role would be in the field and not in the ICP.	Yes	No	Volunteers pre-register with the state. Role is not specifically defined except in wildlife.
Do you have observer programs/options?	Some plan holders may organize an observer program if there is significant local or VIP interest.	VIP tours and observer programs are organized by the plan holders.	VIP tours are arranged during the drill design process.	If the scenario in the drill/exercise allows it. In a real event, we have had VIP tours.	VIP tours can be conducted, but we do not allow for observers to hang around all day	Most companies do not allow observers but Ecology will have them assist in evaluation and companies may allow them to be part of a VIP tour
SELF-CERTIFICATION						
Criteria/Requirements	N/A	Must test all required components of their Spill Contingency Plan within a three-year cycle.	We allow self-certification for out of state drill credits requests.	N/A	By permission.	
Standards for passing/failing	N/A	No	Plan holder is required to submit supporting documentation to support credit request.	N/A	Allowed to self certify year 1 & 2 drills, and we allow for out of state credit if the same response team from Oregon participated in the out of state drill but only for year 1-2.	Same checklist – must provide either documentation or photographs of drill to show achievements.

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EVAUATION						
Criteria for evaluation	Evaluation criteria need to be developed as part of the exercise design so the criteria aligns with the objectives. We look at both qualitative and quantitative performance (operations-based exercises). Are the actions effective? Are needed resources ready, and are staff able to adjust to changing weather or spill scenario conditions? DEC players also contribute to the overall evaluation by completing participant feedback forms and participating in hot washes and exercise debriefs.	Developing guidance	Plan holders must meet/complete requirements of a specific objective. Drill evaluators will look for the required actions and/or deliverables during the evaluation process. Credit is only given based on successfully meeting the criteria listed for each objective. Example for Situation Unit (Marine regulations); all of the below must be meet during the evaluation to receive credit: 9.1) Situation Unit: Collect, organize, and disseminate information about the current status of the spill. At a minimum, display the following: the name of the incident; a chart/map of incident; an organization chart (ICS 207); information on current and forecasted weather, tides and currents; a meeting schedule (ICS 230); and an Incident Status Summary.	Evaluation criteria developed as part of the exercise design	All exercises are graded on the ability of the planholder to 1) Follow their spill response plan 2) follow the Northwest Area Plan and 3) Form a successful Incident Command System.	Modified NPREP. Use triennial cycle to track achievements. Mandatory participation in specific drill types. Drill checklist defines the actions to demonstrate

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Standards for passing/failing	We do not typically use language of pass/fail. However, if the plan holder does not demonstrate they are capable of implementing their plan (for the objective being evaluated) for any reason, DEC will require follow up action that may include repeating the exercise or a portion of it.	N/A	Only SED drills are pass fail. For these drills all objectives must be met to pass the equipment drill. If all objectives are not met the plan holder is given the opportunity to schedule another SED and must then pass all of the objectives again to pass.	No pass/fail, lessons learned	Failing a drill is normally obvious to all. For instance, not bringing their oil spill contingency plan, not having a documentation unit, or not knowing the NWACP. (Such as using dispersants in the drill without consultation.)	Must demonstrate drill objectives over if not achieved, at Ecology's discretion
How do you capture trends in company performance?	We have two approaches: We conduct debriefs after each exercise, and capture Lessons Learned that are critical for identifying broader trends or needs. Secondly, DEC staff responsible for the plan being tested use the Lessons Learned to identify specific needs for the operator and to determine focus areas for future exercises.	After Action Reports and hotwash.	We note trends that need correcting on an open action tracker, discuss trends during staff meetings, and make notes within our internal database.	Hotwash and after-action reports	After action reports, interviews with drill participants and the hotwash.	Using the checklist and keeping lists of lessons learned.

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RESPONSE TIMES						
Are they required?	Response times may be part of the exercise objectives. If they are included, their purpose is to demonstrate that the operator can effectively deploy protection or response equipment within the timeframes they represent in their plan (given average weather conditions.)	Report a spill immediately.	Yes; for Notification credit.	Depends on the scenario and the drill/exercise objective	Yes, there are slightly different standard times for different planholders (facilities vs pipelines vs vessels vs trains) but all require a rapid response, typically within the first hour with additional resources rolling in the first 48 hours.	No.
DRILL CREDITS						
Does your jurisdiction offer credits? If yes, how is this defined?	We do not offer credits. This is in part because we do not have a minimum number of exercises each plan holder is required to complete each year. DEC may hold 2 exercises per year on each plan holder – or consider a plan holder led exercise to be equivalent if DEC participates in planning, conduct, and evaluation.	No	We do not offer credit. Credit must be requested.	No, we do not.	No	Defined on the checklist.

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Must jurisdiction be present at drill for company to receive credit?	If DEC is not present, we will not count an exercises as one of the two we can call per year. We do not have to be present for a plan holder's scheduled <i>training</i> exercise to meet their <i>plan obligations</i> , however.	N/A	Yes	N/A	DEQ needs to be present for WCD's. All other drills can be conducted on their own, however we participate if asked.	Tabletop yes, deployment no. OSRO may act on behalf of the plan holder.
Do you have alternative drill requirements for drill credits?	N/A	N/A	Spill credit can be provided once every 3 years. The spill credit can take the place of a scheduled drill.	N/A	Plan holder may request an alternative. Documented in their plan and accepted if it provides the same or higher level of demonstration.	Plan holder may request an alternative. Documented in their plan and accepted if it provides the same or higher level of demonstration.
Other information on drill credits (links, resources, etc)	N/A	N/A	N/A		N/A	Beginning rulemaking on spill management teams, we expect changes in drill program due to this. Also require one test in triennial cycle (vessel planholders) of the emergency response towing vessel at Neah Bay.

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Do you offer out-of-state credits?	No	N/A	Yes	No	Yes, but not for WCD's.	For vessel companies – they may obtain annual tabletop credit but must hold their worst case drill in WA. Shared border with Oregon and spills could impact both sides, may conduct drills on either side.
LESSONS LEARNED						

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	Exercise planning could be improved: Involve ADEC in exercise planning from the beginning Consider exercising both IMT & field response at the same time Establish robust MSEL & SimCell for IMT exercises Players could be more familiar with the ODPCP, Specifically: notification procedures, contact info, emergency action checklists, facility diagrams, & available equipment.	Responders are clear on their jurisdictional responsibilities. Importance of a fully functional liaison group. Information flow out to public and media – JIC. Importance of documentation of flow of decisions, requests and actions and dissemination of this information for legal and cost recovery purposes. Communications between site, operations, and Environmental Unit.	Top 10 (no order) collected from OSPR D&E Staff and subject matter experts who support D&E Unit. Know your ICS position, duties, and tasks: Know how to use the IMH and where to find things in the IMH. Know your ICS position and what is required of the position. One of the most common deltas reported by Plan Holder staff in hot washes is that more ICS training would improve their performance. Players should get enough training before exercises so that they can	Participate to know the players, position, and the Area Contingency Plan	<u>DEQ is currently (2022) training a large number of new ICS staff.</u> Previously we had about 12 staff trained and we have increased this to 44 due to large statewide real world responses in 2020-2021. We are using the drill and exercise program to increase proficiency and teamwork. <u>Virtual Drills Lessons</u> learned from 2020-2021 have changed how we respond from local first to whole team. Local responders go on scene and are supported by virtual liaison, PIO, EU and GIS staff.	Incorporation of non-floating oil issues in TTX/DPX drills (assessment, resource ordering, tactics). Use of area plan tools to improve process & plans such as social media policy & tool. Align drill objectives with participant invites – improve participation of tribes, agencies in order to fully play issues. Tailor drill injects to local area conditions or issues (such as specific species, local ordinance)

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	Players could use additional IMT training Who should communicate with whom in the IMT Filling out ICS forms & QA/QC of forms Players could use additional training in deploying response equipment & adjusting tactics to be effective Consider fully deploying & running response equipment	Communication skills during an incident. The need for improved pre-incident tools such as job aids, resource inventories, plan templates etc. Ensuring the responsible person response is integrated into Unified Command as soon as possible.	maximize training opportunities presented by drills. Players must have a baseline level of training in ICS. Pre-drill ICS training should be adequately extensive and relatable to prepare players for their roles. Be prepared for the drill: Be prepared to be self-sufficient at the drill. Have all “tools”. Be prepared to work without internet or with poor service. Have all of your critical data pre-loaded on your laptop or flash drive. Be familiar with your gear. If you have a go-kit, make sure it is ready. Some of the most common deltas are related to not having working printers, adequately organized ICPs, internet/phone comms., plugs, ICS forms, etc. These shortcomings are often brushed off by RPs with the justification that in a real response it would take a couple of days to set up a functioning ICP and			Area Plan policies concerning staffing: PIO, LOFR, EUL Enhance SCAT play at drills (e.g. field work to use as data ahead of drill). Virtual Drill Play is likely going to be part of all WCDS in the future.

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			catch up on filling out forms. Contingency Plans: Plan Holder personnel very rarely utilize the facility's contingency plan to find information or tactics during a drill. Utilize the plan! There are lots of resources in plan holder, Area Contingency, and Geographic Response plans that players don't take advantage of during drills; these are missed opportunities both for familiarizing players with the plans, and for correcting mistakes, and updating contact info. Plan holders and SMTs: External SMTs have proven to help struggling (or newly regulated) operators get on track with drills and ICS training. More participation is needed from smaller Plan Holder			

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			staff who are relying on the SMTs to perform all the work; these are missed opportunities to train or refine a skillset. Outreach to other Agencies: Efforts should be made to engage as many agencies as possible who might be involved in early stages of a real response. Players from the RP (Plan Holder), State/Feds, etc., all get much more out of an exercise when local agencies are present to share their knowledge, resources, and concerns, than when just the usual entities are playing. Injects: Context-specific injects can enhance exercise play and training opportunities. Effort should be put toward designing injects specific to the incident's			

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			timing and location. Controllers handling injects should also insist on thorough and appropriate responses before marking them as successfully addressed. Paper injects (non-telephonic) are much better suited for attaining a useful response at a drill. State Objectives: Recognizing that larger Plan Holders/SMTs operate nationally and sometimes globally, it is important that when they exercise in California they are drilling to California standards and all objectives are specific to the state to include but not limited to Wildlife Recovery & Rehabilitation, Volunteer Management, and Applied Response Technologies.			

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			Other: iAuditor is a very useful tool for evaluators. You can't have a great drill without a great PSC. Be flexible. Have a plan B & C...things can and will go wrong, break, or not work (just like a real spill response)!			

Assumption:
No – not at this time
N/A – not under the authority of the spill program listed