

Pacific States/British Columbia Oil Spill Task Force

Drills and Exercises Program Comparison Across Task Force Jurisdictions



December 2025

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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	Inland and Marine Drills, Title 14, CCR, Division 1, Subdivision 4, OSPR Chapter 3, Oil Spill Contingency Plans, Section 820.1: Drills and Exercises regulations 14 CCR 820.1 (ca.gov)	HRS 128D: CHAPTER 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						
Sector(s) required to hold drills (vessel, railroad, trucks, facilities)	Note: ADEC requires a minimum of one operations-based exercise in each 5-year plan approval cycle and may require one additional exercise each year. 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 liters or more)	Vessels, Facilities (Marine/Inland), Production Fields, Platforms, Offshore Facility (oil island), Pipelines, Railroads,	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

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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 Non-crude Tank Vessels; Crude and Non-crude Barges; Non-tank Vessels; railroad tank cars		Small Marine Fueling Facilities, Mobile Transfer Units.			tonnage; Fishing and cargo vessel (300 gross 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: 140 plans; Nontank Vessel plans: 200 + but the number varies seasonally.	210	Approximately <i>(as of end 2024)</i> : Vessel 1,326, Facility Plans 130: Blanket 9, Inland Facility 10, Inland Pipeline 5, Inland Production 14, Marine Facility 41, Marine Pipeline 8, Marine Production 3 MTU 34, Offshore 1, Rail 3,	No data collected	17 (not representative of actual number of vessels/facilities because enrolling large numbers under a single plan is allowed)	16 Facilities (includes 5 Refineries, 3 Pipelines), 8 Railroads, 1 Vessels; 3 Vessel and Umbrella, 1 Vessel and Facility, 21 mobile facility plans

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			Small Marine Fueling Facility 2.			
Number of drills held per year	Variable. 2024: 32 regulated operator exercises in 2024.	420	150 In state drills (2025)	Variable; State participates in industry, and federal-led drills	8-15	Approximately 279-468 TTX per 3 year cycle. This means 93-156 per year.
Number of plans	140 active oil discharge prevention & contingency plans; 242 Nontank Vessel Streamlined plans	210	Approximately 1,456 (<i>as of end 2024</i>): Vessel plans = 1,326 Facility plans = 130	Unknown	23	50
TYPES OF DRILLS/EXERCISES						
Scheduled Equipment Deployment (SED) – field deployment	17 (2024) field deployment exercises via drills or as a component of a full-scale exercise.	210 per year	24 (drill year 2025)	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	20 (2023) Functional exercises.	210 per year	126 (drill year 2025)	23 (drill year 2025)	8-15 per year	30 per year
Wildlife drills/exercises	Not specifically counted for wildlife alone, but very often incorporated into the above exercises.		Once every 3 years		Once every 3 years	Once/year
Multi-customer drills for non-tank vessels	0 (2024)	N/A	Approximately 4 - 6 contracted Spill Management Team Drills every year; SMT represent various plan holders.	No data compiled	Allowed	1 per 3 year cycle.
Worse-case drills/exercises	(2024)	7 over a three-year period. Worst-case	130 over 3-year cycle. Drilled as Reasonable	About three a year	About 6-11 per year	9-12 per year

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	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.	scenario exercises are only required by pipeline and rail.	Worse Case Discharge exercises.			
Unannounced drills (indicate types)	Yes – we hold them, but sparingly and as the need dictates. We also join with USCG/BSEE on GIUEs to include ADEC objectives and evaluation criteria.	No	Participate in 1 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 1-3x 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 the exercise demonstrated a planning gap, the plan holder may be required to conduct additional exercises and/or amend their contingency plan. In extreme cases we may implement procedures to revoke, suspend, or amend the plan.	No	SEDs are pass/fail, all objectives must be achieved to pass. If failed, plan holders are given an after-action report and must re-test SED. If plan holder fails 2 nd time, a violation is issued.	N/A	Letter of Warning: must re-drill within 6 months.	Re-drill, order to correct, penalty for non-compliance
Out of state drills (for credits)	N/A	No	Vessel plan holders also operating out-of-state have an opportunity for 2 years in any	N/A	Accepted, but plan holder must inform us first	Vessel companies only 1 per year

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			consecutive 3-year period to fulfill their annual exercise requirement with an out-of-state exercise (i.e., CoreVEX requirement).			
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.	Credit for an actual spill may be granted once in a 3-year period. Plan holders must request credit within 60 days of conclusion of a spill response and meet all mandatory objectives.	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
ROLES DURING DRILL/EXERCISES	IMT positions we prioritize: State On-Scene Coordinator, Environment Unit, Operations Unit, Liaison Officer, and Joint Information Center. Field positions we prioritize are SOSCr (SOSC representative); We also prioritize Evaluators for exercises. To the extent	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,	DFW-OSPR provides a minimum of 1 evaluator for all drills and exercises. Additional staffing may be provided for exercises, including additional evaluators and ICS positions, such as SOSC, EUL, Resources at Risk	State On-Scene Coordinator, Evaluator	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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	available DEC or other State staff are available, we assign staff to the Planning Section, Operations Section, Situation Unit as DEC's oversight leads.	Sampling, SCAT, Waste Management Plans, Situation Unit Lead, Logistics Section Chief, Planning Section Chief, Operations Section Chief and other positions as needed.	THSP, SCAT, ART, LOFR, PIO, Volunteer Coordinator, Wildlife Brand Director, DOCL, SOFR, and other positions as needed.			
How does your organization participate in drills/Ex? (List core lead roles of agency.)	DEC participates on the planning team for the exercise in coordination with plan holders and other applicable stakeholders. Key positions that DEC always seeks to play in an exercise 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 technical 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		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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	performance demonstrates their oil discharge prevention and contingency plan is adequate and they can implement it (within the brackets of exercise objectives.					

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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/exercise objectives. If DFW-OSPR is the lead in an ICS position, it is either required or expected, depending on the tier and objective, for the plan holder to designate staff to engage with the OSPR lead.	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 SOSOC/Deputy
Is there a role for Tribes for First Nations?	Yes - local on-scene coordinators are incorporated into exercises as applicable.	Unified Command. Can also contribute in other areas such as Planning (EU, SCAT), Operations, Logistics.	Tribes work through the OSPR Tribal LOFR.	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).
Is there a role for volunteers?	No	No	The role of volunteers is managed through the Volunteer Unit.	Yes	No	Volunteers pre-register with the state. Role is not specifically defined except in wildlife.

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Do you have observer programs/options?	Some plan holders may organize an observer program if there is significant local or VIP interest. DEC often has new staff participate in an observer role for their first exercise.	VIP tours and observer programs are organized by the plan holders.	VIP/Tribal 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. Required to submit specific documentation	N/A	By permission.	

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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.
EVAUATION						

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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 (for 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.	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
Standards for passing/failing	We do not typically use the 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 equipment deployment 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 equipment deployment drills 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

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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.
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.	Immediately – this is vague but should be an acceptable time frame. Controlling the spill and safety are immediate concerns.
DRILL CREDITS						
Does your jurisdiction offer credits? If yes, how is this defined?	No. DEC requires a minimum of one operations-based exercise in each 5-year plan approval cycle and may require one additional exercise annually.	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?	Yes. DEC staff must participate in the planning and evaluation of the exercise for it to count as a DEC exercise.	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	N/A	Once triennial cycle (vessel plan holders) exercise the emergency response towing vessel at Neah Bay. Large Scale Multi-Customer Deployment that rotates in three regions (N,S,Inland) Once in a triennial cycle vessel plan holders will exercise the emergency response towing vessel in Neah Bay. Once in a three year cycle – exercise the Wildlife Drill (NRCES/MSRC)

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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.

SUMMARY OF LESSONS LEARNED (2025)

ALASKA

- Plan holders who train and prepare for exercises in advance reap benefits (position specific ICS training, having ICS forms in a readily accessible system, development of pocket guides with IMT and field position tactics to aid staff).
- The need for a virtual ICS component is becoming standard. Seeing improvement with virtual integration during exercises, although challenges remain.
- Positive feedback received from smaller facility operators who noted they benefited from the collaborative exercise planning process with ADEC.
- Drone technology continues to improve and to be a highly valuable tool (supports the common operating picture with the ability to view field operations in the command post).
- Several plan holders have developed notification flowcharts which were beneficial to the notification process.

BRITISH COLUMBIA

NA

CALIFORNIA

- Plan holders are meeting the notification standards by notifying the National Response Center (NRC), OSRO, QI, and California Office of Emergency Services (OES) within the 30-minute initiate notifications standard.
- Plan holders are meeting must meet objective requirements. 2025 is the third year in the moving three year TTX cycle; all plan holders with plans approved prior to 2023 must meet all assigned Tier objectives within the 2023-2025 cycle. We are seeing less failures in 2025.
- Plan holders are embracing the requirement to utilize the correct ICS forms.
- Plan holders continue to have a reduced footprint at TTX events. They are doing what needs to be done to meet the required State & Federal objectives; additional pre-Covid19 activities such as field training, ICS training, and additional training opportunities are greatly reduced. This is about budget management and reduced costs. We are not seeing a reduction in successful deliverables.

HAWAII

- Communication is key and plan holders as well as the State benefit from exercises as it is a chance to work through issues in a low stress environment.

OREGON

NA

WASHINGTON

NA