

**Objectives and Guidelines
for
Unannounced Drills
with
California Oil Spill
Contingency Plan Holders**



April 25, 2001

California Department of Fish and Game
Office of Spill Prevention and Response (OSPR)

INTRODUCTION

The purpose of this document is to outline the scope and nature of the Office of Spill Prevention and Response's (OSPRs) unannounced drill program for the period May 2001 through April 2002. It also provides an overview of drill processes and the criteria used to evaluate marine oil pollution response procedures contained in approved oil spill contingency plans.

Title 14, California Code of Regulations, Section 820, states in part, "The Administrator may call a drill or exercise, or conduct an inspection, to validate all or part of a contingency plan. This drill, exercise, or inspection may be announced or unannounced."

Unannounced drills will be coordinated and conducted by the OSPR with the support of other federal, state, and local government entities as necessary.

UNANNOUNCED DRILL OBJECTIVES

The objectives of unannounced drills held under these guidelines are to demonstrate the ability of plan holders to make timely notifications to all appropriate parties, and to ensure the deployment of resources, in accordance with approved plans, during the three hours immediately following a simulated spill.

UNANNOUNCED DRILL GUIDELINES

Control of the drill will be the responsibility of the designated OSPR Drill Coordinator. The scenarios will be designed by OSPR.

Anyone may stop the drill for safety reasons. Once stopped, only the Safety Officer may restart the drill. The Safety Officer will be designated by the Drill Coordinator.

Drill activities will be planned to minimize interruptions of oil or cargo transfer operations.

Deployment of marine facility and bunker provider containment boom will be scheduled and conducted in advance of the unannounced drill. The boom thus provided need not be deployed during the unannounced drill.

All State, Federal, and local costs incurred in conjunction with participation in the exercise will be borne by each respective agency. All other costs will be the responsibility of the plan holder.

Sequence of events for Notification, Containment, and Skimming requirements.

Immediate

Boom deployment – In order to minimize interruption of cargo and bunker transfers, marine facilities and bunker providers will be given the opportunity to deploy their containment boom in advance of the actual unannounced drill. The boom provided by the marine facility or bunker provider to meet the immediate booming requirement need not be deployed during the unannounced drill. Facilities and vessels that comply with Title 2, Article 5, Section 2395(c)(1)(2)(3) (California State Lands pre-booming requirement), will satisfy this objective. Timing of drill events starts with notification. Pre-deployed boom totals count towards the two-three hour boom requirement.

Thirty minutes

Notify Oil Spill Response Organization (OSRO) by phone.
Notify Qualified Individual (QI) by phone.
Notify (simulate) National Response Center (NRC) by phone.
Notify California Office of Emergency Services (OES) by phone.

Two-Three hour

Boom deployment – Recommend 2,500’ boom (600’ immediate and 1900’ additional) for a 2,500 barrel spill.

Skimming capacity - 2,500 bbls/day or 10 percent of the Reasonable Worst Case Spill (RWCS) whichever is less. For non-tank vessel, 2,500 bbls/day or 10 percent of the largest fuel tank, whichever is less, must be mobilized, on-scene and deployed within two hours from the start of the drill. Plan holders will have three hours to deploy and operate skimming equipment if sufficient boom for a 2500 barrel spill can be immediately deployed (Recommend 2500 feet).

Sufficiently trained personnel should be on the scene and prepared to deploy and operate all equipment within one hour of arrival and no later than the designated timeframes. Similarly, all equipment shall be in such condition that it will be deployed and operated within one hour of arrival.

Storage capacity - Plan holders must demonstrate the operational capability to transfer recovered oil to adequate storage. This may consist of the storage associated with the skimming system.

Boats and personnel - Adequate amounts of personnel and boats must be employed for on-water activities.

UNANNOUNCED DRILL MATRIX

I. Marine Facilities and Tank Vessels Moored at Marine Terminals

Immediate Notification

1. Contact the Oil Spill Response Organization (OSRO) within 30 minutes.
2. Contact with Qualified Individual, OES, and National Response Center within 30 minutes)

Immediate Booming

1. Deploy 600 feet of containment boom (marine facilities).

On-water recovery and booming

1. 2500 bbl/day on-water recovery equipment or 10% RWCS which ever is less, on-scene and deployed in two hours.
2. (Recommend) 2500 feet of containment boom in two hours on-scene and deployed in two hours.
3. If two hour boom amounts are deployed immediately, then on-water recovery equipment can be on-scene and deployed in three hours.

II. Non-Tank Vessels and Tank Vessels Bunkering

Immediate Notification

1. Contact the Oil Spill Response Organization (OSRO) within 30 minutes.
2. Contact the Qualified Individual, OES, and National Response Center within 30 minutes.

On-water recovery and booming

1. 2500 bbl/day on-water recovery equipment or 10% of the RWCS which ever is less, on-scene and deployed in two hours.
2. (Recommend) 2500 feet of containment boom in two hours on-scene and deployed in two hours.

3. If two hour boom amounts can be deployed immediately, then on-water recovery equipment can be on-scene and deployed in three hours.

III. Non-Tank Vessel

Stockton and Sacramento,
Humboldt Bay, Monterey Bay
Operating (underway)*

Immediate Notification

1. Contact the Oil Spill Response Organization (OSRO) within 30 minutes.
2. Contact with Qualified Individual, OES, and National Response Center within 30 minutes.

Immediate Booming Equipment

1. Must have containment boom (recommend 2500 feet of containment boom) and associated deployment equipment for a 2500 barrel spill pre-staged. Physical deployment will not be required.

IV. Non-Tank Vessel

Not Operating (moored)

Immediate Notification

1. Contact the Oil Spill Response Organization (OSRO) within 30 minutes.
2. Contact the Qualified Individual, OES, and National Response Center within 30 minutes.

EVALUATION

The Administrator will provide the participating plan holder with a drill evaluation report within ten business days of the drill's conclusion.

If a plan holder refuses to participate, the Administrator shall revoke a contingency plan. If a plan holder fails to meet the zero to three-hour drill, the Administrator may require an additional unannounced drill or take other appropriate actions, which may include revoking a contingency plan. If minor deficiencies are noted, the plan holder will have 30 days to correct them to the satisfaction of the Administrator.

If a plan is revoked, a plan holder may appeal the decision in accordance with Title 14, California Code of Regulations, Section 816.03 (g) and 826.03 (g).

These exercises may fulfill the semi-annual equipment deployment exercise requirement of facility-owned equipment pursuant to California Code of Regulations, Title 14, Section 817.02 (k)(1)(B). Plan holders may request credit to fulfill the equipment deployment exercise requirements of Section 817.02(k)(3) for marine facilities; Section 818.02 (l)(1) (D) for tank vessels; and, Section 827.02 (m)(1)(B) for non-tank vessels.

* Note: Vessels will not be boarded while underway.