



Ship Type: All Trade Area: California

Bulletin 188 - 05/01 - Unannounced Drill Program - California - USA

Tankers and non-tank vessels trading to California should be aware that they may be called on to participate in an unannounced drill (ie. a drill for which no prior warning is given). The California State Office of Spill Prevention and Response (OSPR) has recently finalized the objectives and guidelines on the State Unannounced Drills Program, which initially runs from May 2001 to April 2002, but may be extended thereafter.

In case of an unannounced drill, it is anticipated that an OSPR officer will board the vessel without prior arrangement and will inform the Master of the unannounced drill and the drill scenario details. Once the Master has been notified of the drill, OSPR will expect the following actions, in the following sequence:

Immediate

Boom deployment - Under California law, whenever a vessel is engaged in transfer operations (bunkering and/or oil cargo operations), there must be sufficient equipment and personnel to contain a 50 barrel spill on-site ready for immediate deployment. This equates to approximately 600 feet of containment boom. The bunker supplier and/or marine facility normally meet this requirement.

However, the OSPR's Guidelines indicate that marine facilities and bunker providers will be given an opportunity to deploy their containment boom in advance of any unannounced drill, in order to minimize interruption of cargo and bunkering operations. The OSPR also indicates that boom which has been deployed in advance by a marine facility or bunker provider will not have to be deployed again during the unannounced drill.

Within thirty minutes

The Master is responsible for ensuring the following notifications are made by himself or by the QI:

- Oil Spill Response Organization (OSRO) by phone.
- Qualified Individual (QI) by phone.
- National Response Center (NRC) by phone (this call alone can be simulated - the others must be real).
- California Office of Emergency Services (OES) by phone.

Within two to three hours

The following equipment must be on scene and ready for deployment:

An additional 1900 feet of containment boom (assuming that the immediate booming requirement of 600 feet has already been deployed during the drill, or in advance of the drill under the OSPR's arrangements for marine facilities and bunker suppliers).

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.

The OSPR has decided that the planholder will be responsible for costs of the drill. These will mainly relate to equipment deployment. For tanker owners who are members of Clean Bay Inc. or Clean Coastal Waters Inc, these companies have indicated they will provide the necessary coverage with no charge. For owners who are using NRC or MSRC (either directly or through the Club arrangements for nontank vessels), estimates of their participation costs range from \$3,000 to \$10,000. The wide range of the estimates reflects different perceptions of OSPR's actual requirements as well as different costs for different locations where drills may be conducted (with estimates for SF Bay being more expensive than Long Beach for example).

Members should note that drill costs do not fall within Club cover, and NRC or MSRC will therefore require authorization from the owner before incurring the costs of participation in the drill. Such requests for authorisation may be addressed by the OSRO to the QI or to the master/owner directly. It is therefore recommended that the owner ensures that his QI and/or master are in a position to provide prompt authorization of funding, in order to avoid any delay by the OSRO in equipment deployment.

Failure in participating in the drill may result in the revocation of the owner's contingency plan. If only minor deficiencies in the drill are noted, the planholder will have 30 days to correct them to the satisfaction of OSPR.

The OSPR Guidelines can be found in the attached document. Members who wish to address inquiries directly to OSPR can contact Christopher Klumpp at OSPR on + 1 916 322 1195. Further general information on California State law can be found in the Club's Environmental Encyclopaedia, accessible through [Online Services](#) on the Club website at www.ukpandi.com.

Source of Information: Dr Chao Wu (New Jersey)
Tel. +1 201 557 7426
Email. chao.wu@thomasmiller.com