



Unannounced Drill Program: Testing Spill Management Team Capability through Vessel & Facility Oil Spill Contingency Plans



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ABSTRACT

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Since 2012, California Department of Fish and Wildlife, Office of Spill Prevention and Response (OSPR) has been conducting unannounced drills on Spill Management Teams (SMTs) cited in industry oil spill contingency plans. The purpose of the program is to better understand the readiness of the spill response industry in California with an eye towards continued improvement. OSPR initiated a phased approach for this program; starting with evaluation and training, then deficiency identification and coordination with other federal and state agencies, and finally, issuing credit and lessons learned. Beginning in 2017, the program will expand statewide to capture the SMTs utilized by the inland industry, and will build upon lessons learned in the marine environment.

JURISDICTION

OSPR is the State's lead agency for prevention of, planning for and responding to oil spills into waters of the state. California has a significant oil transportation, storage, production and refining industry. Statewide, California has nearly 300 facilities, which include production facilities, marine and transfer terminals, refineries, pipelines, and railroad. Additionally, more than 10,000 vessels call on California's ports each year. Many of these vessels fall under OSPR's jurisdiction and are required, like applicable facilities, to have an approved Vessel or Facility Oil Spill Contingency Plan (CPlan) on file with OSPR. Per the California Code of Regulations, OSPR is able to conduct unannounced drills to test the CPlans, including the notification process and initial response actions by their inhouse or contracted SMT. Emergency regulations governing the development of CPlans for inland facilities, pipelines, refineries, and railroads became effective in 2015. Newly regulated inland CPlan holders will be rolled into OSPR's announced and unannounced drill programs beginning in 2017.

UNANNOUNCED DRILLS: THE WHOS, WHATS, AND WHYS

Identification of a SMT is one of the many requirements of a CPlan. SMTs are comprised of people who contribute skills and services to support oil spill response operations, and can either be staffed by a CPlan holders' employees or these services may be contracted out. Per the National Response Plan, all federal and state agencies are required to utilize the Incident Command System (ICS), as described by the U.S. National Incident Management System (NIMS). Consistent with this directive, all SMTs designated in a CPlan must use the terminology and principles of NIMS ICS.

OSPR introduced an unannounced SMT Drill Program (Program) in 2012, based on needs and shortfalls identified through unannounced drills for spill notification-only and equipment deployments, which OSPR had been doing for numerous years. To better understand the state of oil spill response readiness, and because the initial steps (e.g., state and federal notifications) are critical to an effective and efficient response, OSPR expanded their unannounced drills to also test SMTs. OSPR hosted workshops for CPlan holders and SMT consultants to introduce the Program and to provide the regulated community with the proposed guidelines and objectives for the new Program. It was intended for the Program to be piloted in phases as described herein.



Yearly Tallies of Unannounced Drills

Year	Notification Only	SMT
2012	13	--
2013	17	2
2014	32	7
2015	23	6
2016	38	11
2017 Goals	72	24

LOOKING TO THE FUTURE

Overall, the Program has been successful in meeting its goals. It has strengthened OSPR's partnerships with other agencies and the regulated industry. It has brought deficiencies in oil spill response readiness to light and resulted in improved SMT capabilities. There has been both an increase in response resources and improved utilization of those resources (e.g., government and industry staff time) through this Program.

This Program will be expanding with the additional drills of inland Cplan holders and SMTs. The focus of the inland drills during the first two years will be similar to Phase I in the marine environment. Therefore, Phase III will be both the maintenance of marine oil spill response readiness and the shepherding of inland SMTs towards meeting and excelling in OSPR's drill objectives and regulatory requirements. OSPR will also be developing and testing new metrics of SMT capability, and assessing regulatory and statutory options for Program implementation.

PROGRAM IMPLEMENTATION

PHASE I: 2012-2014

Phase I Goals:

- Survey the standard operating procedures of SMTs to better understand the state of oil spill response readiness
- Evaluate overall SMT response capability in a nonthreatening way, and provide education and training

Phase I Implementation Strategies:

- Initiate drills without specific expectations, and instead look for any patterns of reoccurring deficiencies
- Neither credit nor withhold credit for drill objectives, and do not take punitive action

Phase I Summary:

- Identified deficiencies of SMTs:
- Insufficiently trained in ICS
 - Unable to adequately fill ICS positions
 - ICS competencies were not maintained due to insufficient practice

- Successes and needs identifications:
- Drills provided education and training for CPlan holders and SMTs, particularly for initial oil spill response procedures
 - Improved standardization of SMT evaluation
 - Enhanced coordination between OSPR's unannounced and announced Drills & Exercises Programs

PHASE II: 2014-2016

Phase II Goals:

- Utilize objectives for evaluation of SMT's initial oil spill response readiness
- Hold joint unannounced drills with federal partners

Phase II Implementation Strategies:

- Credit or withhold credit from the CPlan holder for objectives
- Coordinate drills with US Coast Guard's (USCG) Government Initiated Unannounced Exercise Program and with the US Environmental Protection Agency (USEPA)
- Allow credit achieved for objectives during an unannounced drill to transfer over to Cplan holder's regulatory requirements under the announced Drills & Exercises Program

Phase II Summary:

OSPR saw improved initial oil spill response readiness:

- Reduced redundancy between OSPR's drill programs and CPlan holders and SMTs were incentivized to achieve all of the objectives
- More and better trained personnel in ICS
- Maximized public and industry resources through the integrated government-initiated unannounced drills

PROPOSED PHASE III: 2017-2018

Phase III Goals:

- Maintain high level of oil response readiness in the marine environment
- Introduce the Program to inland Cplan holders and SMTs
- Continue and improve integration with USCG and USEPA-led exercises and drills
- Evaluate regulatory and statutory options for implementation of this Program
- Improve and track Program effectiveness

Phase III Implementation Strategies:

- Pilot the Program inland with a focus on education and training similar to Phase I in the marine environment, and utilize the lessons learned from previous phases
- Develop and test metrics for evaluation of SMT improvement and Program effectiveness
- Double the number of drills conducted statewide annually



ADDITIONAL INFORMATION

For information on the unannounced drill program: <https://www.wildlife.ca.gov/OSPR/Drills-Exercises/Unannounced-Drill-Program>
 An index for all applicable statutes and regulations can be found at: <https://www.wildlife.ca.gov/OSPR/Legal>

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