

**2016 NATIONAL PREPAREDNESS**

**FOR**

**RESPONSE EXERCISE PROGRAM**

**(PREP)**

**GUIDELINES**

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**DEPARTMENT OF HOMELAND SECURITY**

**U.S. Coast Guard**



**ENVIRONMENTAL PROTECTION AGENCY**



**DEPARTMENT OF TRANSPORTATION**

**Pipeline and Hazardous Materials Safety Administration**



**DEPARTMENT OF THE INTERIOR**

**Bureau of Safety and Environmental Enforcement**



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To the “Response Community”:

This is the third revision since August 1994 to the Preparedness for Response Exercise Program (PREP), when we set out together to design an effective and coordinated exercise program under the Oil Pollution Act of 1990. As before, the revisions are the result of an open dialogue and the incorporation of lessons learned over the past two decades. We considered issues identified in written comments received by the Department of Homeland Security in response to regulatory docket IDs: USCG-2011-1178 and BSEE-2014-0003, which announced the upcoming revision. The PREP will evolve as government and industry continue to meet the challenges of protecting public health, welfare, and the environment. We look forward to working with all parties as we continue to improve the PREP process.

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Using the PREP Guidelines is voluntary; they are not regulations. Although agency regulations state that compliance with the PREP Guidelines will satisfy certain regulatory requirements, you are not required to use the PREP Guidelines to satisfy those requirements. You may choose an alternative approach if the approach satisfies the requirements of applicable statutes and regulations. Where provisions of the PREP Guidelines state that a plan holder is required to undertake a certain action, for instance the provisions that state a plan holder “must” undertake actions, those provisions presume that the plan holder is voluntarily using the PREP Guidelines to satisfy the existing regulatory requirements for oil spill response plan exercises specified within the relevant agency-specific Code of Federal Regulations.

Some of the regulatory requirements discussed in this document involve collections of information. An agency may not conduct or sponsor, and a person is not required to respond to, an information collection that does not display a currently valid Office of Management and Budget (OMB) control number. OMB control numbers for regulatory requirements can be found in each agency's regulations or *Federal Register* notices. For example:

Coast Guard vessel and facility response planning requirements, including exercise requirements, are covered by OMB control number 1625-0066.

Environmental Protection Agency requirements are covered by OMB control number 2050-0135.

Pipeline and Hazardous Materials Safety Administration requirements are covered by OMB control number 2137-0589.

Bureau of Safety and Environmental Enforcement oil spill response requirements for facilities located seaward of the coastline are covered by OMB control number 1014-0007.

See [www.reginfo.gov](http://www.reginfo.gov) for the current approval status of each collection.

## ACRONYMS

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ACP	Area Contingency Plan
AMPD	Average Most Probable Discharge
API	American Petroleum Institute
BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations
Co-Op	Cooperative (aka OSRO)
COTP	Captain of the Port
CPS	Contingency Preparedness System
CWA	Clean Water Act
DHS	U.S. Department of Homeland Security
DOI	U.S. Department of the Interior
DOT	U.S. Department of Transportation
EEZ	Exclusive Economic Zone
EPA	U.S. Environmental Protection Agency
FE	Functional Exercise
FOSC	Federal On-Scene Coordinator
FPSO	Floating Production, Storage, and Offloading
FRP	Facility Response Plan
FSE	Full-Scale Exercise
FWPCA	Federal Water Pollution Control Act
GIUE	Government-Initiated Unannounced Exercise
GRP	Geographic Response Plan
HSEEP	Homeland Security Exercise and Evaluation Program
IAP	Incident Action Plan

ICS	Incident Command System
IMT	Incident Management Team
ISB	<i>In-Situ</i> Burn
ITB	Integrated Tug/Barge Combination
JIC	Joint Information Center
MFF	Marine Firefighting
MIDU	Mobile Inland Drilling Unit
MMPD	Maximum Most Probable Discharge
MODU	Mobile Offshore Drilling Unit
MTR	Marine Transportation-Related
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NIMS	National Incident Management System
NRS	National Response System
NRT	National Response Team
NSFCC	National Strike Force Coordination Center
NTV	Nontank Vessel
NTVRP	Nontank Vessel Response Plan
OCONUS	Outside the Continental United States
OCS	Outer Continental Shelf
OMB	Office of Management and Budget
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator
OSPD	Oil Spill Preparedness Division (BSEE)
OSRO	Oil Spill Removal Organization
OSRP	Oil Spill Response Plan (BSEE)
PHMSA	Pipeline and Hazardous Materials Safety Administration

PREP	Preparedness for Response Exercise Program
PREP 4C	Preparedness for Response Exercise Program Compliance, Coordination and Consistency Committee
QI	Qualified Individual
RCP	Regional Contingency Plan
RP	Responsible Party
RRT	Regional Response Team
SMFF	Salvage and Marine Firefighting
SORS	Spilled Oil Recovery Systems
SROT	Spill Response Operating Team
SSDI	Subsea Dispersant Injection
TAPAA	Trans-Alaska Pipeline Authorization Act
TTX	Tabletop Exercise
UC	Unified Command
U.S.	United States
USC	U.S. Code
USCG	United States Coast Guard
VOSS	Vessel of Opportunity Skimming System
VRP	Vessel Response Plan
WCD	Worst Case Discharge

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## PREP GUIDELINES

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### 1.1 Purpose

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable exercise program that meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311 (j) of the Federal Water Pollution Control Act (FWPCA), by adding subsection (6) and subsection (7) for spill response preparedness (33 United States Code (U.S.C.) § 1321 (j)). PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the U.S. Government and oil industry to adopt and sustain. PREP is a unified federal effort and satisfies the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Bureau of Safety and Environmental Enforcement (BSEE). Completion of the exercises described in the PREP Guidelines is one option for maintaining compliance with OPA 90-mandated federal oil pollution response exercise requirements.

PREP addresses the exercise requirements for oil pollution response plans. In this edition, the new Nontank Vessel Response Plan (NTVRP) and Salvage and Marine Firefighting (SMFF) exercise requirements described in Section 3 of these Guidelines apply only to USCG-regulated vessels in accordance with recent changes to Title 33 of the Code of Federal Regulations (CFR), Part 155. There are additional industry planning and exercise requirements contained in other federal statutes that are not addressed in these Guidelines.

PREP helps to clarify OPA 90 exercise objectives and provides a methodology for evaluating compliance with federal regulations. PREP does not mandate a given exercise design process. Plan holders are free to design exercises that meet the PREP objectives as well as their own internal ones. Some plan holders have adopted Homeland Security Exercise and Evaluation Program (HSEEP) exercise design guidance for OPA 90 exercises. The use of HSEEP planning process is acceptable, but not required, for planning PREP exercises.

The PREP Guidelines describe the minimum expectations for ensuring adequate response preparedness. If government, industry, or plan holders desire to expand their exercise programs beyond the PREP Guidelines, they are highly encouraged to do so.

The PREP exercises should be viewed as an opportunity to improve response plans and the response system. **Plan holders are responsible for addressing any issues that arise from evaluation of exercises and making changes to their respective response plans to ensure the highest level of preparedness.**

### 1.2 Applicability and Participation in PREP

Plan holders are required to meet pollution response exercise requirements. One option to satisfy regulatory exercise requirements is to follow these PREP Guidelines for developing your exercise program. **Using the PREP Guidelines is voluntary.** Plan holders are not required to follow the PREP Guidelines and, if they choose not to, may develop their own exercise program

that complies with the regulatory exercise requirements of the appropriate federal oversight agency. Plan holders may take credit for exercise requirements that are met by activities conducted in conjunction with other exercises, or during response to an actual incident, as long as the PREP exercise objectives are met, the response was evaluated, and the proper records are maintained.

### **The USCG and the EPA follow the PREP Guidelines in the planning and execution of their Area-level pollution response exercise programs.**

If an industry plan holder has developed one response plan that covers a fleet of vessels, multiple offshore facilities (as defined in 33 CFR § 154.105), or multiple offshore leases or facilities (as described in 30 CFR § 254.3), this plan holder would only be required to conduct one "set" of exercises for the plan, with the exception of the qualified individual (QI) notification exercises, SMFF remote assessment and consultation exercises, and the emergency procedures exercises, which are required for all applicable vessels. Vessel Response Plan (VRP) regulations apply to tank vessels, tank barges, and nontank vessels (NTVs); but exclude nontank barges except when a nontank barge is part of an integrated tug/barge combination (ITB).

Appendix B of these Guidelines provides a Quick Reference Guide to PREP Exercises.

## **1.3 Effective Date**

The PREP Guidelines will become effective 60 days after the date of publication in the *Federal Register*. The PREP Guidelines follow the calendar year (January 1–December 31).

## **1.4 Definitions**

The definitions in this document are intended only to provide information within the context of the PREP Guidelines. Where the language in any of these definitions differs from language contained within any applicable statutes and regulations, the definitions in the statutes and regulations take precedence.

Alternative Training and Exercise Program. An alternative training and exercise program is an exercise program submitted to and approved by the USCG (as specified in 33 CFR § 155.5061) by owners or operators of NTVs with an oil capacity of less than 250 barrels in order to meet their exercise requirements, in lieu of the training and exercise requirements that apply to other NTVs.

Area. An Area is that geographic area for which a separate and distinct Area Contingency Plan (ACP) has been prepared, as described in OPA 90.

Area Committee. Area Committees are those committees comprised of federal, state, and local officials, formed in accordance with section 4202 of OPA 90, whose task includes preparing an ACP for the Area for response to a discharge of oil or hazardous substance (as defined in the Clean Water Act (CWA)).

Area Incident Management Team (Area IMT). The Area IMT is the group of individuals within the USCG or EPA Federal On-Scene Coordinator (FOSC) organization with responsibility for

incident response management within the respective Area. The Area IMT should include state and local personnel whenever possible.

Average Most Probable Discharge (AMPD) (USCG)/Small Discharge (EPA). This definition is agency-dependent, and the appropriate definitions are detailed as follows:

1. For USCG-regulated vessels, a discharge of 50 barrels (2,100 gallons) of oil from the vessel during oil transfer operations (33 CFR § 155.1020).
2. For USCG-regulated facilities, a discharge of the lesser of 50 barrels (2,100 gallons) or one percent of the volume of the worst-case discharge (WCD) (33 CFR § 154.1020).
3. For EPA-regulated facilities, a small discharge is a volume of 2,100 gallons (50 barrels) or less, provided this amount is less than the WCD (40 CFR § 112.20).
4. For PHMSA: Not applicable.
5. For BSEE: Not applicable.
6. For complexes regulated by more than one federal agency, the largest of the AMPDs calculated for the various regulated components.

Barge Custodian. A barge custodian is the individual who has custody of an unmanned barge. The barge custodian may be affiliated with the towing vessel, fleeting area, or facility at which the barge may be moored. The custodian can be the towing vessel operator, the facility operator, the fleet operator, or whoever may be in charge of the entity that has custody of the barge.

Certification. Documentation that certifies that an exercise was:

1. Completed;
2. Conducted in accordance with the PREP Guidelines and met all listed objectives; and
3. Evaluated using a mechanism that appraised the effectiveness of the response or contingency plan.

Complex Facility. A complex facility is one that is regulated under section 311 (j) of the CWA (33 U.S.C. § 1321 (j)) by two or more federal agencies.

Cooperative (Co-Op). A co-op is a classified or non-classified Oil Spill Removal Organization (OSRO) that provides oil spill response coverage. Classified co-ops can provide AMPD, maximum most probable discharge (MMPD), and WCD coverage while non-classified co-ops provide only AMPD coverage.

Drill. A drill is an operations-based exercise employed to validate a specific function or capability that is commonly used to provide training, validate procedures, or practice and maintain current skills.

Discussion-Based Exercises. Discussion-based exercises include seminars, workshops, and tabletop exercises (TTXs). These types of exercises can be used to familiarize participants with, or develop new, plans, policies, agreements, and procedures. Discussion-based exercises focus

on strategic, policy-oriented issues. Facilitators and/or presenters usually lead the discussion, keeping participants on track towards meeting exercise objectives.

Equipment Deployment Exercise. An equipment deployment exercise is an exercise during which response equipment is deployed to a specific site and operated in its normal operating environment.

Equipment Activation. Equipment activation is the movement, staging, deployment, or operation of response equipment, as determined by the plan holder in consultation with the exercise design team.

Exercise Design Team. This team designs the exercise and may be comprised of federal, state, and industry representatives who are stakeholders in the scenario.

Federal On-Scene Coordinator (FOSC). The FOSC is the federal official pre-designated by the EPA or the USCG to coordinate and direct federal responses under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), or the official designated by the lead agency to coordinate and direct removal actions under subpart E of the NCP. The term FOSC is synonymous with the term On-Scene Coordinator (OSC) as described in the NCP.

Functional Exercise (FE). FEs are designed to validate and evaluate capabilities, multiple functions and/or sub-functions, or interdependent groups of functions. FEs are typically focused on exercising plans, policies, procedures, and staff members involved in management, direction, command, and control functions. In FEs, events are projected through an exercise scenario with event updates that drive activity typically at the management level. An FE is conducted in a realistic, real-time environment; however, movement of personnel and equipment is usually simulated.

Full-Scale Exercise (FSE). FSEs are typically the most complex and resource-intensive type of exercise. They involve multiple agencies, organizations, and jurisdictions, and validate many facets of preparedness. FSEs often include many participants operating under cooperative systems such as the Incident Command System (ICS) or Unified Command (UC). In an FSE, events are projected through an exercise scenario with event updates that drive activity at the operational level. FSEs are usually conducted in a real-time, stressful environment that is intended to mirror a real incident. Personnel and resources may be mobilized and deployed to the scene, where actions are performed as if a real incident had occurred. The FSE simulates reality by presenting complex and realistic problems that require critical thinking, rapid problem solving, and effective responses by trained personnel.

Government-Initiated Unannounced Exercise (GIUE). GIUEs are government-initiated compliance monitoring activities that allow regulatory agencies the opportunity to evaluate various aspects of a plan holder's preparedness, including their emergency procedures, and their contracted OSROs' capabilities for proper and timely equipment deployment.

Group V Oils or oils that may exhibit similar qualities. Group V oils are oils with a specific gravity greater than 1.0. Examples of these oils include, but are not limited to: diluted bitumen (dilbit), asphalt, asphalt products, extra-heavy oil, and natural bitumen (oil sands).



Incident Management Team (IMT). The IMT is the group of personnel identified to staff the appropriate organizational structure to manage response implementation in accordance with the response plan.

Industry. For the purpose of these Guidelines, industry refers to the regulated group of owners or operators who are required to submit response plans for oil spills. The regulated group may consist of vessels, marine transportation-related (MTR) facilities, onshore and certain offshore non-transportation-related facilities, pipelines, or offshore facilities. The response plan requirements and regulations for these entities are administered by the USCG, EPA, PHMSA, and BSEE.

Marine Firefighting (MFF) Organization. For the purposes of these Guidelines, MFF organization means the entity that provides resources—such as personnel, equipment, supplies, and other capabilities necessary to perform marine firefighting services identified in the VRP—and which has been arranged by contract or other approved means. MFF resource providers can include public firefighting resources as long as they are able, in accordance with the requirements of 33 CFR § 155.4050(d), and willing to provide the required services. Refer to the definitions for “resource provider” and “primary resource provider.”

Marine Transportation-Related (MTR) Oil Facility. This facility type means any onshore facility or segment of a complex regulated under Sec. 311(j) of the CWA by two or more federal agencies, including piping and any structure used, or intended to be used, for transfer of oil to or from a vessel, subject to regulation under 33 CFR § 154, or any deepwater port subject to regulation under 33 CFR § 150. For a facility or segment of a complex regulated by two or more federal agencies under Sec. 311(j) of the CWA, the MTR portion of the complex extends from the facility oil transfer system’s connection with the vessel to the first valve inside the secondary containment surrounding tanks in the non-transportation-related portion of the facility or, in the absence of secondary containment, to the valve or manifold adjacent to the tanks comprising the non-transportation-related portion of the facility, unless another location has otherwise been agreed to by the Captain of the Port (COTP) and the appropriate federal official.

Maximum Most Probable Discharge (MMPD) (USCG)/Medium Discharge (EPA). This definition is agency-dependent, and the appropriate definitions are detailed as follows:

1. For USCG-regulated vessels, a discharge of 2,500 barrels (105,000 gallons) of oil for vessels with an oil cargo capacity equal to or greater than 25,000 barrels (1,050,000 gallons), or 10 percent of the vessel's oil cargo capacity for vessels with a capacity of less than 25,000 barrels (1,050,000 gallons) (33 CFR § 155.1020).
2. For USCG-regulated facilities, a discharge of the lesser of 1,200 barrels (50,400 gallons) or 10 percent of the volume of a WCD (33 CFR § 154.1020).
3. For EPA-regulated facilities, a discharge greater than 2,100 gallons (50 barrels) and less than or equal to 36,000 gallons (858 barrels) or 10 percent of the capacity of the largest tank at the facility, whichever is less (40 CFR § 112.20).
4. For PHMSA: Not applicable.
5. For BSEE: Not applicable.

6. For complexes regulated by more than one federal agency, the largest of the MMPDs calculated for the various regulated components.

Mobile Marine Transportation-Related Facility. Mobile MTR facility means any oil facility that can readily change location, such as a tank truck or tank car, other than a vessel or public vessel as defined by 33 CFR § 154.105.

National Response System (NRS). Under 40 CFR § 300 (NCP), the NRS includes the National Response Team (NRT), Regional Response Teams (RRTs), Area Committees, OSCs, and state and local government entities involved with response planning and coordination.

Nontank Vessel (NTV). An NTV is a vessel meeting the description provided in 33 CFR § 155.5015(a), which reads: (a) Except as provided in paragraph (d) of this section, this subpart applies to each self-propelled vessel that—(1) Carries oil of any kind as fuel for main propulsion; (2) Is not a tank vessel or is not certificated as a tank vessel; (3) Operates upon the navigable waters of the United States, as defined in 46 U.S.C. § 2101(17a); and (4) Is 400 gross tons or more as measured under the convention measurement system in 46 U.S.C. § 14302 or the regulatory measurement system of 46 U.S.C. § 14502 for vessels not measured under 46 U.S.C. § 14302.

*NOTE: Mobile Off Shore Drilling Units (MODUs) are considered NTVs. However, MODUs are also subject to regulations covered in 30 CFR § 254 addressing Offshore Facility Response Plans (FRPs).*

Oil Spill Removal Organization (OSRO). An OSRO is an entity that provides oil spill response resources to remove oil from the environment or mitigate associated impacts. OSROs include, but are not limited to, providers for source control, mechanical recovery, dispersants, bioremediation, *in-situ* burning or other spill countermeasures, as well as any for-profit or not-for-profit contractor, cooperative, or in-house provider of oil spill removal resources established in a geographic area to provide oil spill removal resources required by regulation.

Offshore Facility (33 U.S.C. § 1321(a)(11)). The CWA defines an offshore facility as any facility of any kind located in, on, or under any of the navigable waters of the United States, and any facility of any kind that is subject to the jurisdiction of the United States and is located in, on, or under any other waters, other than a vessel or a public vessel.

Onshore Facility (33 U.S.C. § 1321(a)(10)). The CWA defines an “onshore facility” as any facility (including, but not limited to, motor vehicles and rolling stock) of any kind located in, on, or under, any land within the United States other than submerged land.

### Operating Environments.

For the purposes of PREP and oil spill removal equipment requirements, there are three types of operating environments (33 CFR § 154, 33 CFR § 155, 40 CFR § 112):

1. River and canal;
2. Great Lakes/Inland; and
3. Ocean (nearshore, offshore, and open ocean).

For the purposes of PREP and SMFF requirements, there are three different types of operating environments (33 CFR § 155.4030(b)):

1. Pier;
2. Nearshore; and
3. Offshore.

Operations-Based Exercises. Operations-based exercises include drills, FEs, and FSEs. These exercises can be used to validate plans, policies, agreements, and procedures; clarify roles and responsibilities; and identify resource gaps. Operations-based exercises are characterized by actual reaction to an exercise scenario, such as initiating communications or mobilizing personnel and resources.

Persistent Oil. A persistent oil is a petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. Persistent oils are further classified based upon specific gravity as follows:

1. Group II—specific gravity of less than 0.85.
2. Group III—specific gravity equal to or greater than 0.85 and less than 0.95.
3. Group IV—specific gravity equal to or greater than 0.95 and less than or equal to 1.0.
4. Group V—specific gravity greater than 1.0.

Plan Holder. The term “plan holder” is not defined in oil spill regulations. It is a term in common usage and refers to the entity (company, organization, or agency) that owns or operates vessels, facilities, and pipelines for which a response plan is required to be submitted by federal regulation. If an owner or operator is authorized to prepare one plan for a fleet of vessels or multiple facilities, that owner or operator is considered to be the plan holder.

Primary Oversight Agency. The primary oversight agency is the agency with regulatory authority over a particular facility or vessel. For the purposes of PREP, the four primary oversight agencies and the industries they regulate are the USCG (vessels, MTR facilities), EPA (onshore and certain offshore facilities landward of the coastline), PHMSA (pipelines and certain transportation-related facilities), and BSEE (offshore facilities seaward of the coastline).

Primary Resource Provider. A primary resource provider is listed in the VRP as the principal entity contracted for providing specific SMFF services and resources, when multiple resource providers are listed for that service, for each of the COTP Zones in which a vessel operates. The

primary resource provider will be the point of contact for the plan holder, the FOSC, and the UC in matters related to specific resources and services, as required in 33 CFR § 155.4030(a).

Qualified Individual (QI). A QI is the person located in the United States who meets the requirements identified in the respective federal regulations (USCG, EPA, PHMSA, BSEE), and who is authorized to do the following: (1) Activate and engage in contracting with OSRO; (2) act as a liaison with the OSC; and (3) obligate funds of the plan holder required to effectuate response activities. The QI will be the individual or a designee identified in the response plan.

Remote Assessment and Consultation. Remote assessment and consultation means contacting the SMFF resource providers identified in a VRP, by phone or other means of communications, to discuss and assess an SMFF situation. The person contacted must be competent to consult on a determination of the appropriate course of action and initiation of a response plan.

Resource Provider. The resource provider is an entity that provides personnel, equipment, supplies, and other capabilities necessary to perform salvage and/or MFF services identified in the response plan, and has been arranged by contract or other approved means.

Salvage Organization. For the purposes of these Guidelines, salvage organization means the entity that provides resources such as personnel, equipment, supplies, and other capabilities necessary to perform salvage services identified in the VRP, exclusive of MFF services, and which have been arranged by contract or other approved means. Refer also to the definitions for “resource provider” and “primary resource provider.”

Salvage and Marine Firefighting (SMFF) Provider. SMFF Provider refers to a company providing SMFF response services to applicable tank vessels and NTVs. Refer also to the definitions for “resource provider” and “primary resource provider.”

Self-Certification. Self-certification is a declaration made by a plan holder that their exercise has met the following standards:

1. Completed the exercise;
2. Conducted the exercise in accordance with the PREP Guidelines;
3. Met all objectives listed; and
4. Evaluated the exercise using a mechanism that appraises the effectiveness of the response or contingency plan.

Self-Evaluation. Self-evaluation means that the plan holder is responsible for carefully examining the effectiveness of the plan for response during the exercise. The plan holder may choose the mechanism for conducting this appraisal, as long as it appropriately measures the plan’s effectiveness. The plan holder is responsible for addressing issues that arise in the exercise that would lead to improvements in the response plan or any aspect of preparedness for response. The plan holder is responsible for incorporating necessary changes to the response plan as a result of the exercise.

Seminars. Seminars generally orient participants to, or provide an overview of, authorities, strategies, plans, policies, procedures, protocols, resources, concepts, and ideas. As a

discussion-based exercise, seminars can be valuable for entities that are developing or making major changes to existing plans or procedures. Seminars can be similarly helpful when attempting to assess or gain awareness of the capabilities of interagency or interjurisdictional operations.

SMFF Response Services. SMFF response services means the 19 services listed below and defined by regulations requiring their inclusion in applicable VRPs. SMFF response services are not classified by the USCG.

## SALVAGE

### Assessment & Survey

1. Remote assessment and consultation;
2. Begin assessment of structural stability;
3. On-site salvage assessment;
4. Assessment of structural stability; and
5. Hull and bottom survey.

### Stabilization

6. Emergency towing;
7. Salvage plan;
8. External emergency transfer operations;
9. Emergency lightering;
10. Other refloating methods;
11. Making temporary repairs; and
12. Diving services support.

### Specialized Salvage Operations

13. Special salvage operations plan;
14. Subsurface product removal; and
15. Heavy lift.

## MARINE FIREFIGHTING

### Assessment & Planning

16. Remote assessment and consultation; and
17. On-site fire assessment.

### Fire Suppression

18. External firefighting teams; and
19. External vessel firefighting systems.

Spill Response Operating Team (SROT). A SROT comprises the trained persons who respond to spills through deployment and operation of oil spill response equipment (30 CFR § 254.6).

Tabletop Exercises (TTX). A TTX is intended to generate discussion of various issues regarding a hypothetical, simulated emergency. TTXs can be used to enhance general awareness, validate plans and procedures, rehearse concepts, and/or assess the types of systems needed to guide the prevention of, protection from, mitigation of, response to, and recovery from a defined incident. Generally, TTXs are aimed at facilitating conceptual understanding, identifying strengths and areas for improvement, and/or achieving changes in perceptions. During a TTX, participants are encouraged to discuss issues in depth, collaboratively examining areas of concern and solving problems. The effectiveness of a TTX is derived from the energetic involvement of participants and their assessment of recommended revisions to current policies, procedures, and plans.

Timely. As used in relation to GIUE programs, this means the times established in the appropriate response planning regulations for providing response resources to a spill or significant threat of such a spill.

Unified Command (UC). This entity is a command structure consisting of the FOSC, representatives from the state, the responsible party (RP), and other parties that have authority or functional responsibility for an area that may be affected by an incident and coordinate or manage a major aspect of the response. The UC is used during a response to achieve the coordination necessary to carry out an effective and efficient response.

Verification. Verification is the act of ensuring that an exercise was properly documented and certified. Verification would be conducted by the USCG, EPA, PHMSA, or BSEE. Verification of the exercise records may be conducted through normal operations of the regulatory agency, such as inspections, boarding, spot checks, or other systems developed to ensure that exercises are being conducted and properly documented.

Vessel. For the purpose of the PREP Guidelines, a vessel is any vessel required by 33 CFR § 155 to submit a response plan.

Worst Case Discharge (WCD). This definition is agency-dependent, and the appropriate definitions are detailed as follows:

1. For USCG-regulated vessels, a discharge in adverse weather conditions of a vessel's entire cargo as defined in 33 CFR § 155.1020.
2. For USCG-regulated facilities, the size of the discharge as defined in 33 CFR § 154.1020 (in the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions meeting the requirements of 33 CFR § 154.1029).
3. For EPA-regulated facilities, the size of the discharge described in 40 CFR § 112.20.
4. For PHMSA-regulated facilities or pipelines, the size of the discharge as defined in applicable regulations (49 CFR § 130 or § 194).
5. For BSEE-regulated offshore facilities, the size of the discharge as defined in applicable regulations (30 CFR § 254).
6. For Areas, the size of the discharge as specified in the ACP. *NOTE: WCD is defined in the NCP at 40 CFR § 300.5.*

7. For complexes regulated by more than one federal agency, any of the WCDs calculated for the various regulated components.

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## 2.0 GUIDING PRINCIPLES

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### 2.1 Safety

Safety during an exercise or an actual response is paramount; the plan holder and responders carry the primary responsibility for safety. The response plan should comply with all regulatory requirements while considering safety factors. Plan holders and responders are never expected to operate in an unsafe manner during an exercise or actual response. It is the plan holder's responsibility to confirm that the resources identified in the response plan can mount an effective response while operating safely within all applicable laws and regulations. In short, there is no expectation or justification for placing people at risk during an exercise or response. Safety violations will be considered a failure to follow response plans and likely lead to an unsatisfactory exercise.

### 2.2 Core Components for Exercising Response Plans

Appendix A of these Guidelines outlines 15 core components that should be exercised for each response plan during the exercise cycle. These core components may be exercised through a combination of exercise types that are described in the following Guiding Principles and agency-specific sections (Sections 3, 4, 5 and 6).

### 2.3 Plan Holder Exercises

Plan holder exercises are planned and implemented within the plan holder's organization. This type of exercise may include personnel that are employed or contracted by the plan holder such as the QI, cooperatives, OSROs, associated supporting contractors, consultants, and others affiliated with the plan holder's IMT. Plan holders should consider the appropriate level of involvement of external participants. The plan holder exercises are designed to examine specific components of their response plan, and cumulatively to ensure that the whole plan is ready to be implemented.

Plan holder exercise types include:

1. QI notification exercises;
2. Remote assessment and consultation exercises for vessels;
3. Emergency procedures exercises for vessels;
4. Emergency procedures exercises for facilities (optional);
5. IMT exercises;
6. Shore-based salvage and shore-based MFF management team exercises for vessels;
7. Equipment deployment exercises; and
8. GIUEs.

All plan holder-initiated exercises should be self-evaluated and self-certified by the owner or operator.

### 2.3.1 Qualified Individual Notification Exercises

The purpose of the QI notification exercise is to ensure that the QI (or designee) listed in the response plan will respond as expected and carry out his or her required duties in a spill response emergency or significant threat of a spill. Contact by telephone or radio must be made with the QI, and confirmation must be received from him or her to satisfy the requirements of this exercise. Electronic messaging is an acceptable alternative if voice contact is not possible.

The QI notification exercise is not intended to verify phone numbers, points of contact, or the notification list contained in the plan. The plan holder is expected to verify this information when updating the notification list periodically (recommended at least once every six months) as part of the normal course of conducting business.

**At least once per year, the QI notification exercise should be conducted during non-business hours.**

#### 2.3.1.1 Vessels

For vessels, it is the responsibility of the plan holder to ensure that the QI notification exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this exercise.

For vessels, electronic messaging will be acceptable, but the baseline should be voice communication. If electronic messaging is used for this exercise, confirmation from the QI must be received to properly satisfy the requirements of this exercise.

#### 2.3.1.2 Unmanned Tank Barges

For unmanned tank barges, it is the responsibility of the plan holder to ensure that the QI notification exercise is conducted. **If a plan holder has a fleet of unmanned tank barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the QI notification exercise.** The plan holder should have the barge custodian of the chosen barge conduct the exercise. This method will ensure that all barges and custodians are ultimately included in the exercises.

### 2.3.2 Remote Assessment and Consultation Exercise for Vessels

Early incident notification and activation of VRPs may prevent potential spills from turning into spills, and prevent actual spills from escalating in size, beginning with the early initiation of a situational assessment by a competent salvage professional. The purpose of the remote assessment and consultation exercise is to ensure that personnel are able to initiate remote assessment and consultation when a situation presents a discharge or substantial threat of a discharge. Substantial threats of a discharge may exist during, but are not limited to, grounding, stranding, collision, hull damage, fire, explosion, loss of propulsion, flooding, and equipment failure, where taking preventive action may prevent spillage.

The remote assessment and consultation exercise requires following VRP notification and activation procedures. The remote SMFF assessor contacted during the PREP exercise must be competent to consult on a determination of the appropriate course of action and initiation of a response plan. This initial course of action may be as simple as identifying appropriate key measurements aboard the vessel and establishing a reporting timetable for status updates to the remote assessor, in order to facilitate damage assessment using a computerized program.

The remote assessment and consultation exercise must be conducted annually by each vessel in the VRP when the vessel is operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise, upon entry into U.S. waters, the exercise must be conducted at least one time per vessel per year. The remote assessment and consultation exercise is not required for vessels outside of U.S. waters for the entire year. **This PREP exercise should be conducted during non-business hours at least once per plan per year.**

#### 2.3.2.1 Tank and Nontank Vessels Carrying Oil as Cargo or Fuel

For manned tank vessels and NTVs, it is the responsibility of the plan holder to ensure that the remote assessment and consultation exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this PREP exercise annually, when operating in U.S. waters.

#### 2.3.2.2 Tank Barges

For tank barges, it is the responsibility of the plan holder to ensure that the remote assessment and consultation exercise is conducted.

**If a plan holder has a fleet of tank barges covered by one response plan, the plan holder should randomly choose a barge in the fleet to conduct remote assessment and consultation exercise.** The plan holder should have the barge custodian of the chosen barge conduct the PREP exercise. This method will ensure that all vessel response plans and custodians are ultimately included in the exercises.

### 2.3.3 Emergency Procedures Exercises

The purpose of the emergency procedures exercises is to ensure that personnel are capable of conducting the initial actions necessary to mitigate the effects of a spill.

#### 2.3.3.1 Tank and Nontank Vessels Carrying Oil as Cargo or Fuel

For vessels, it is the responsibility of the plan holder to ensure that the emergency procedures exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this PREP emergency procedures exercise. Since vessels do not always sail with the same crews, it is important that each vessel conducts this exercise quarterly to ensure that the personnel on board are familiar with the procedures for mitigating a spill or potential spill, as well as an SMFF incident, occurring from that vessel.

### 2.3.3.2 Unmanned Tank Barges

For unmanned tank barges, it is the responsibility of the plan holder to ensure that the emergency procedures exercise is conducted.

**If a plan holder has a fleet of unmanned tank barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the emergency procedures exercise.** The plan holder should have the barge custodian of the chosen barge conduct the exercise. The plan holder should choose the barges and the various custodians randomly to ensure that all barges and custodians will ultimately be included in the exercises.

### 2.3.3.3 USCG and EPA Marine Transportation-Related Facilities (optional)

Facilities have the option of conducting emergency procedures exercises. For the purpose of the PREP, emergency procedures for facilities are the procedures established at the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational activities associated with cargo transfers. An emergency procedures exercise conducted unannounced by the facility would satisfy the facility's requirement for the annual plan holder-initiated unannounced exercise.

### 2.3.4 Incident Management Team Exercises

For USCG, EPA, PHMSA, and BSEE-regulated plan holders, the owner or operator identifies an IMT in the response plan. The IMT conducts an annual exercise, in accordance with the PREP Guidelines. The response plan is used in the exercise to ensure that the IMT is familiar with the plan and is able to use it effectively to conduct a response, including all response countermeasures described in the plan. For any chemical or biological countermeasure or *in-situ* burning cited in the response plan, the IMT must demonstrate the ability to prepare and submit a request, usage, and monitoring plan. Each specific countermeasure listed in the plan will be exercised during the triennial cycle. At least one IMT exercise in a triennial cycle must involve a WCD scenario. The exercise design team may use alternative WCD scenarios that are representative of a worst-case scenario (e.g., exercise of a pipeline line segment WCD) for environmental impact purposes. One or more plan holder representatives must participate in each exercise.

If a response plan lists different types of IMTs for varying sizes of incidents (for example, a local IMT for small incidents, a regional team for larger incidents, and a national team for major incidents), each team identified is required to participate in an annual IMT exercise.

It is recommended that the IMT actions and documentation include, at a minimum:

1. ICS forms 201, 204, and 207;
2. Incident Action Plan (IAP); and
3. Health and Site Safety.

### 2.3.5 Shore-Based Salvage and Shore-Based Marine Firefighting Management Team Exercises for Vessels

The VRP holder who must follow 33 CFR § 155, Subpart I, SMFF, must conduct shore-based salvage and shore-based MFF management team exercises annually. NTVs with oil capacity less than 250 barrels are exempt from MFF exercise requirements. This requirement for an annual exercise will be satisfied if conducted in accordance with the PREP Guidelines. The response plan, and associated pre-fire plan when applicable, must be used in the exercise to ensure that the management teams are familiar with the plans and are able to use them effectively to conduct an SMFF response.

These annual exercises may be conducted in conjunction with the annual IMT exercise, or separately. Annual SMFF PREP exercises may be combined when the criteria for claiming credit found in the exercise description (Section 3) are met.

### 2.3.6 Equipment Deployment Exercises

The purpose of PREP equipment deployment exercises is to ensure that response equipment is appropriate for the operating environment in which it is intended to be used and that operating personnel are trained in its deployment and operation. The equipment deployment exercise guidelines apply to all plan holders and their contracted equipment operators. It is the responsibility of the plan holder to ensure that its respective equipment deployment exercise requirements are met.

A plan holder's equipment deployment exercise program should include the following components:

1. Personnel who would normally operate or supervise the operation of the response equipment must participate in the exercise.
2. Personnel must demonstrate the ability to deploy and operate the equipment, while wearing appropriate personal protective equipment.
3. A training program must be provided for the personnel involved in equipment deployment and for equipment operators. The operating personnel should participate in exercises or responses on an annual basis in order to ensure that they remain trained and qualified to operate equipment in the operating environment.
4. Response equipment must be in good operating condition.
5. Equipment must be appropriate for the intended operating environment.
6. Equipment must be operated during the exercise.
7. There must be a maintenance program for all response equipment.

Plan holders are responsible for ensuring that all equipment types cited in their respective plans are exercised, whether the equipment is plan holder owned and operated, or supplied through an OSRO/SMFF provider. It is not necessary to deploy every piece of each type of equipment, as long as all equipment is included in a periodic inspection and maintenance program intended to ensure that the equipment remains in good working order. **Although not required as part of this section, plan holders are encouraged to use these exercises as an opportunity to validate response strategies detailed in ACPs.**

### 2.3.6.1 OSRO Involvement in Equipment Deployment Exercises

PREP exercises strive to deploy a representative sample of each type of equipment. The rationale for this approach is that if the representative sample is in proper operating condition, then the rest of the equipment could be expected to be in the same working order since it would be part of the company's maintenance program. Similarly, if a representative sample of the OSRO's personnel are involved in the deployment exercise and handle their responsibilities effectively, the rest of the personnel could be expected to be knowledgeable and effective, since they would be a part of the company's training program. **When selecting the equipment and personnel for the exercise, the OSRO should ensure that the same equipment and personnel are not used repeatedly for each exercise. The equipment and personnel should be selected on a rotational basis, with the ultimate goal of eventually exercising all of the OSRO's equipment and personnel.**

If an OSRO has separate field response facilities located throughout the country in areas that do not lend themselves to regional consolidation, each staffed field response facility, for the purpose of the PREP, will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise.

In both cases, if the OSRO is classified to deploy equipment to more than one type of operating environment, the OSRO must conduct a deployment exercise in each of the environments.

Some OSROs have small field response facilities. A field response facility is defined as a location where personnel and equipment are staged. Some of these OSROs have divided their operations into regional response facilities. In some instances, a regional facility will be responsible for several small field response facilities or equipment stockpiles. For the purpose of the equipment deployment exercises under the PREP, each regional facility will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise of the minimum amount of equipment specified in the PREP. The OSRO regional facility would be responsible for coordinating resources from all field facilities within the region for the exercise. In such instances, equipment may be drawn from one or more field facilities, but personnel from each field facility must participate in the equipment deployment exercise. If the OSRO operates using regional facilities, that OSRO will be responsible for defining its regional boundaries and providing information to its plan holders. Generally, however, regions should be reasonable in geographic size. At a minimum, plan holders must ensure that their OSRO(s) conduct annual equipment deployment exercises in each operating environment in which they expect to operate for each USCG district and EPA ACP Area, or EPA Subarea (where identified), unless adjoining Areas or Subareas authorize an alternative. For example, if an OSRO is located in the First USCG District, and provides response assets to the Fifth USCG District as well, those two districts might mutually agree to allow the OSRO to conduct fewer exercises due to similarity of operating environments in those Areas. The OSRO should request this consideration in writing to the appropriate Area Committees and/or EPA Subarea.

If the OSRO is cited in a response plan outside of its normal equipment staging and operating areas (e.g., as a Tier 2 responder), the plan holder citing that OSRO must ensure that the OSRO has the local knowledge relevant to an effective, efficient response in the plan holder's operating area. The plan holder must describe arrangements for providing the OSRO with

information such as equipment launching locations, tides and currents of the local area, and any other logistical problems or information specific to the particular area. Plan holders are encouraged to conduct familiarization training with each OSRO cited in the response plan to provide information such as equipment launching locations, tides and currents of the local area, and any other logistical problems or information specific to the particular area. This familiarization training may include a walk-through or actual equipment deployment as appropriate, such that each OSRO can be made aware of any logistical problems related to equipment deployment.

It is the plan holder's responsibility to ensure that the OSRO has completed the equipment deployment exercise requirements and has prepared the necessary documentation. All plan holders must remember that merely citing an OSRO in their response plan is not sufficient to ensure credit for the equipment deployment exercise.

### 2.3.6.2 Cooperatives

For the purposes of the PREP Guidelines, co-ops must meet the same annual exercise requirements as all other OSROs. Each facility and personnel will not have to conduct the exercise individually. The co-op as a whole would conduct one equipment deployment exercise per year. **All entities that provide response resources to a co-op should participate in this exercise.** For co-ops that are comprised of several different OSROs, each unique OSRO would be required to conduct an annual equipment deployment exercise.

Co-op personnel who are responsible for deploying the response equipment must be involved in a training program that prepares them for operating the response equipment. Likewise, the co-op must have a maintenance program for all of the response equipment.

### 2.3.6.3 Vessel and Facility Plan Holder Owned and Operated Oil Spill Removal Equipment

Plan holder owned and operated oil spill removal equipment is defined as equipment owned by a plan holder and operated either by the plan holder's own personnel or other personnel hired by the plan holder to operate this equipment. Whoever operates this equipment must be involved in the equipment deployment exercises. This equipment is separate from SMFF equipment.

If plan holder owned and operated oil spill removal equipment is identified for use in a spill response plan, the plan holder is required to deploy this equipment twice per year (semiannually). The plan holder would be required to deploy the minimum amount of equipment for deployment specified in this section or the total amount of equipment that the plan holder has available for response, whichever is less. The requirement for semiannual equipment deployment is based on the fact that this equipment is not deployed routinely and that the personnel operating it do not do this as a part of the vessel's or facility's normal operations. The semiannual requirement is necessary to ensure adequate preparedness for spill response.

The plan holder's personnel responsible for deploying the response equipment must be involved in a training program that prepares them for operating the response equipment. The



plan holder should ensure that equipment and personnel are rotated and not used repeatedly for each exercise. Likewise, the vessel/facility plan holder must have a maintenance program for all of the response equipment.

#### **2.3.6.4 Plan Holders Using a Combination of OSRO Equipment and Plan Holder Owned and Operated Equipment**

Plan holders citing both OSRO equipment and their own oil spill removal equipment in their response plans would be required to exercise both types of equipment at the above described intervals.

#### **2.3.6.5 Shared Credit for OSRO Equipment Deployment Exercises**

Due to the large number of plan holders participating in PREP and the burden it would put on OSROs to conduct separate equipment deployment exercises on behalf of each plan holder they provide services for, it is an accepted practice for OSROs to conduct equipment deployment exercises on behalf of all their plan holders. In such circumstances, exercise credit can be extended to and shared amongst all the plan holders for the deployment of that specific OSRO equipment and personnel in a specific location (USCG COTP zone, RRT region, EPA ACP Area, or EPA Subarea), provided that each plan holder has contracted for the use of both the equipment and personnel that were exercised. Where exercise credit is extended to all the plan holders who are clients for an OSRO's equipment deployment exercise, each type of response equipment being deployed in this manner should be exercised on an annual basis (as opposed to once during the triennial cycle).

#### **2.3.6.6 Types of Equipment to Be Deployed in Plan Holder Equipment Deployment Exercises**

##### **2.3.6.6.1 Oil Response Systems**

1. Mechanical Skimming/Recovery Systems. One of each type of skimming system as listed in the plan should be deployed. A skimming system includes containment boom, hoses, piping, pumps, prime movers, support vessels, etc., necessary for the effective operation of that system.

Types of skimming/recovery systems may include, but are not limited to:

- a. Oleophilic – Brush;
- b. Oleophilic – Disc;
- c. Oleophilic – Paddle belt;
- d. Oleophilic – Rope mop;
- e. Oleophilic – Sorbent lifting belt;
- f. Oleophilic – Submersion belt;
- g. Oleophilic – Submersion plane;
- h. Suction (including vacuum trucks);
- i. Weir;
- j. Advancing weir; and
- k. Special-purpose skimmers (e.g., fast water).



2. In-Situ Burn (ISB) Systems. Each type of ISB system listed in the plan and relied on by the plan holder in meeting response equipment capability requirements should be deployed, including boom, method of ignition, support vessels, and smoke plume monitoring equipment. Use of ISB to actually burn oil is not allowed during an exercise.
3. Aerial/Vessel Dispersant Systems. Each type of dispersant package listed in the plan and relied on by the plan holder in meeting response equipment capability requirements should be deployed, including dispersant delivery vehicles, application equipment, and dispersed oil plume monitoring equipment. Use of actual dispersants is not allowed during an exercise. Deployment exercises for dispersant equipment should include the following:
  - a. Dispersant spray aircraft should conduct actual spraying operations using water during deployment exercises.
  - b. Dispersant deployment exercises should use spotter aircraft to direct spray operations, and spotting personnel should demonstrate familiarity with best management practices for protecting wildlife.
  - c. Aerial dispersant deployment exercises should be conducted offshore and far enough out of sight of land to simulate expected flight conditions during actual offshore spraying operations.
  - d. Dispersant spray documentation systems, flight tracking and flight recording systems, key communications equipment, and flow control and reporting systems should be tested.
4. Booming Systems. Booming systems include protective and containment boom not exercised as part of a skimming or ISB system described above; 1,000 feet (or total amount of boom listed in plan, whichever is less, particularly for inland plan holders located near small water bodies) of each protective or containment boom system or alternative system listed in the plan and relied on by the plan holder in meeting response equipment capability requirements should be deployed. Protective boom systems (boom and means of deploying and anchoring) include the following types:
  - a. Fence boom;
  - b. Curtain boom: Internal foam, external foam, self-inflatable, and pressure inflatable;
  - c. External tension boom;
  - d. Tidal seal boom (only 50 feet of this type of boom need be deployed.);
  - e. Special purpose;
  - f. Ice booms;
  - g. Fast-water booms (equipment and/or techniques intended to improve spill containment/control in fast-water situations); and
  - h. Alternative systems, particularly for inland plan holders, may include the following:
    - i. Temporary dams;
    - ii. Underflow dams;

- iii. Weirs; and
- iv. Inflatable diaphragms for drainage culverts.

These alternative systems may be used by the plan holder in the initial response to an oil discharge in conjunction with booming systems, which may be used further downstream in the planning distance.

5. Oil Spill Surveillance and Tracking Systems. These systems include the use of remote sensing and platforms used to conduct surveillance and track spilled oil, and to direct the mechanical recovery, dispersant, and ISB operations for spilled oil.
6. Source Control, subsea containment, and subsea dispersant injection equipment (SSDI). See Section 6.5 on BSEE-Regulated Offshore Facilities for more information.

#### **2.3.6.6.2 Salvage and Marine Firefighting Equipment Deployment Exercises**

The owner or operator of vessels that have SMFF requirements should ensure that the SMFF provider identified in the response plan exercises a representative sample of the SMFF equipment described in 33 CFR §§ 155.4025 and 155.4030 for the following categories of SMFF services, as applicable:

1. Salvage assessment and survey;
2. Stabilization;
3. Specialized salvage operations;
4. MFF assessment and planning; and
5. Marine fire suppression.

The SMFF provider must be identified by contract or other approved means, with a funding agreement, and the equipment deployment exercises must be documented according to PREP Guidelines.

The SMFF provider should ensure that the same equipment and personnel are not used repeatedly for each exercise. Documenting actual equipment deployment may be used to satisfy this requirement. The ultimate goal is to exercise each type of equipment and personnel. SMFF equipment should be deployed in each applicable operating area within the three-year exercise cycle. Documentation of the use of equipment, such as heavy lift equipment deployed on non-response operations, may be used to satisfy this requirement.

It is the vessel plan holder's responsibility to ensure that the contracted SMFF provider has completed PREP equipment deployment exercise requirements. All vessel plan holders identifying a contracted SMFF provider in their response plans should be able to document completion of their equipment deployment requirements following receipt of exercise information from the SMFF provider. Documentation of actual deployments may be accepted to satisfy this requirement.

#### **2.3.7 Unannounced Exercises**

Unannounced exercises are one of the cornerstones of oil spill exercise requirements. They provide plan holders and regulatory agencies with the opportunity to evaluate vessel and

facility response plan procedures for notifications, OSRO response time to the incident location, and deployment of facility-owned or OSRO equipment.

To maintain an adequate level of oil spill preparedness in the local area, it is highly important to continually evaluate the readiness of OSROs to deploy their equipment during a realistic scenario and fulfill obligations to their plan holders.

#### **2.3.7.1 Plan Holder-Initiated Unannounced Exercises**

Annually, plan holders (excluding plan holders regulated by BSEE) should ensure that one of the following is conducted as an internally-initiated unannounced exercise:

1. Emergency spill procedures exercise for vessels;
2. Emergency procedures exercise for facilities (optional);
3. IMT exercise; and
4. Equipment deployment exercise.

Additionally, each vessel plan holder with SMFF requirements should ensure that one of the following is conducted as an unannounced exercise:

1. Emergency SMFF procedures exercise for vessels; and
2. SMFF equipment deployment exercise for vessels.

An unannounced exercise is one in which the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill and/or SMFF incident.

To satisfy OPA 90 requirements for unannounced drills and maintain an adequate posture for response preparedness, it is necessary to have an exercise program comprised of both announced and unannounced exercises. The annual unannounced exercise requirement is necessary to maintain the level of preparedness to respond to a spill effectively.

A response to an actual spill may be considered for plan holder-initiated unannounced exercise requirement credit, if the response was self-evaluated and required exercise objectives were met and documented by the plan holder.

The emergency procedures exercise is being offered as an option for facilities, to provide an additional exercise that may be conducted unannounced.

#### **2.3.7.2 Government-Initiated Unannounced Exercises**

GIUEs are compliance activities that allow regulatory agencies the opportunity to evaluate various aspects of a plan holder's preparedness, including their emergency procedures and their contracted OSROs' capabilities for proper and timely equipment deployment. The frequency of these drills for the noted agencies is as follows:

1. For USCG-regulated vessels and facilities, GIUEs are limited to a maximum of four total per COTP zone per year.

2. For EPA-regulated facilities, GIUEs are limited to a minimum of 10 percent of the plan holders per EPA region per year.
3. For PHMSA-regulated facilities or pipelines, the number of GIUEs is determined by DOT. DOT reserves the authority to conduct and require an operator to participate in a GIUE. A facility will not be required to participate in a GIUE more than once every 36 months, unless the results of previous exercises indicate that follow-up drills are warranted due to inadequate performance during a drill.
4. For BSEE-regulated offshore facilities, the number of GIUEs is determined by the Oil Spill Preparedness Division (OSPD) Chief. A facility will not participate in a BSEE-initiated unannounced exercise more than once every 36 months, unless the results of previous exercises indicate that follow-up drills are warranted due to inadequate performance during a drill.

A plan holder directed to participate in a GIUE is required to do so unless specific conditions exist that may result in safety hazards. The cost of the unannounced exercise will be borne by the response plan holder.

Federal agencies are encouraged to engage other regulatory partners in conducting local joint GIUEs to leverage scarce resources in order to more readily assess plan holder and OSRO capabilities within the local area. Joint USCG and EPA GIUEs should include an AMPD scenario for either the USCG-regulated or EPA-regulated portion of the facility. USCG units also have the opportunity to participate in BSEE-led GIUEs. Members of the Area Committee are encouraged to review and discuss the GIUE results to assess their overall preparedness.

For complex facilities that are regulated by two or more agencies, the exercising agency should notify and invite the participation of the other agency(ies) and the responsible OSC in advance, so as to minimize the possibility of the facility being exercised multiple times during a compressed time period.

#### **2.3.7.2.1 Successful Completion of Government-Initiated Unannounced Exercises**

A facility that has successfully completed a GIUE will not be required to participate in another GIUE for at least 36 months from the time of the last exercise. The facility must maintain documentation of this participation.

A vessel that has successfully completed a GIUE will not be required to participate in another GIUE in any USCG COTP zone for at least 36 months. The vessel must maintain documentation of this participation. All other vessels covered by the same VRP will not be subject to a GIUE in that COTP zone for 36 months, but may be subject to a GIUE in another USCG COTP zone.

Guidelines for determining successful completion of an exercise and for determining enforcement actions (including, but not limited to, assessment of civil penalties) for an unsuccessful exercise are the responsibility of the individual oversight agencies, based on application of their individual agency regulations.

Each industry GIUE participant may follow the appropriate steps to document the exercise and take credit, as prescribed in these Guidelines, for successful completion of the exercised portion of their respective response plans.

For an exercise to be successful, it must meet the scope and objectives established for each particular GIUE. Proper notifications and equipment deployment in response to spill scenarios (vessel and facility) are the two primary objectives evaluated by the initiating authority. Failure to complete an exercise successfully indicates one or more of the following:

1. The plan holder could not properly implement its response plan.
2. Response resources were not available or not in operating condition.
3. Response personnel were not adequately trained in implementing the response plan.

Enforcement actions that may be necessary include, but are not limited to, successful completion of an additional unannounced exercise, revisions to the approved response plan, or administrative action by the initiating authority. It is the responsibility of the agency with oversight of the regulated entity to develop specific guidelines for determining the successful completion of an exercise and for determining appropriate enforcement actions for an unsuccessful exercise.

One of the objectives for successful completion of an exercise is to demonstrate that the response can be conducted in a timely manner. Note that the term “timely” is associated with a planning rather than a performance standard. Timely is defined in Section 1 of these Guidelines and is further discussed in specific portions of the Guiding Principles and in those sections of these Guidelines that address specific exercise elements for vessels and facilities.

#### **2.3.7.2.2 Marine Transportation-Related Facilities and Vessels Regulated by the USCG**

GIUEs test the ability of FRP and VRP holders to execute their plans in response to an AMPD. GIUEs strengthen interagency and industry partnerships, and improve the COTP’s awareness of the plan holder’s emergency procedures and local OSRO capabilities. A broad goal for all GIUEs is that they result in a safe, timely, and effective response. Further discussion on GIUE scope and objectives is detailed in Sections 3.14 and 3.15 of these Guidelines.

It is important to keep in mind that response timeframes in the regulations are planning standards and not performance standards, and that the GIUE program focuses on AMPD. A successful GIUE cannot be determined solely by a stopwatch, but rather through the subjective evaluation of a variety of factors. Response time criteria are detailed in 33 CFR § 154.1045(c) for facilities and 33 CFR § 155.1050 (d) for vessels. A general summary table of the response times for Groups I-IV oils is provided:

<b>AMPD Planning Criteria: Response Times (From Spill Detection)</b>				
<b>Spill Site Location</b>	<b>Vessel Response Plans</b>		<b>Facility Response Plans</b>	
	On-scene deployment of boom	On-scene deployment of oil recovery and storage equipment	On-scene deployment of boom	On-scene deployment of oil recovery and storage equipment
Location of MTR facility or 0-12 miles from the nearest shoreline	0-1 hour	0-2 hours	0-1 hour	0-2 hours
12-200 miles from the nearest shoreline	1 hour + transit time (assumes on-water speed of 5 knots)	1 hour + transit time (assumes on-water speed of 5 knots)	N/A	N/A

Once the equipment is delivered on scene, personnel should be able to deploy and operate the equipment without significant difficulty (e.g., people should generally be aware of locations of equipment launch sites, anchoring points and deployment strategies). However, because specific conditions vary at every site, deployments are not likely to be entirely seamless and personnel may need to make adjustments that will delay completion of the deployment. In fact, the ability to adjust to these differing environmental conditions may be an indicator of the competence of response personnel.

While it is intended that equipment be in the water and operational before the end of a 4-hour exercise period, there are circumstances, particularly related to safety and noninterference with actual operations, that may delay completion of deployment beyond that time. In such a case, exercises should continue until equipment is deployed and operated satisfactorily.

### 2.3.7.2.3 Non-Transportation-Related Facilities Regulated by the EPA

The measure of an effective GIUE will be the overall ability of the responders identified in the FRP to rapidly and effectively control a small discharge, with particular attention to those actions that afford the best chances to control a spill and minimize its impact in the first few hours of the incident. While recognizing that an effective response to an oil discharge entails the rapid deployment of proper equipment, it is not the intention of the EPA to use timeliness as the sole factor when evaluating the response to a GIUE for a small discharge. EPA personnel will evaluate whether the response equipment in the FRP arrives on time. These times are listed in the FRP and are based on the response planning requirements in 40 CFR § 112 or alternative response times when approved by the EPA Regional Administrator. Whether the containment boom and recovery devices specified in the FRP arrive precisely at the specified times is less relevant than the overall conduct of the exercise and the successful achievement of the exercise objective described in PREP. The objective of a GIUE for a small discharge includes the following sub-objectives:

1. Conducting proper notifications.
2. Arrival of containment boom and/or alternative systems as specified in the FRP within one hour of detection of the discharge and subsequent successful deployment. For alternative systems using temporary dams or underflow dams, simulated installation of these systems according to the FRP is expected to be performed for a successful GIUE. For plans using both containment boom and alternative systems, successful boom

deployment and simulated installation of the alternative systems is expected for a successful GIUE.

3. Arrival of oil recovery devices as specified in the approved FRP within two hours of detection of the discharge and the subsequent successful operation/simulated recovery.
4. Demonstrating the availability of adequate storage capacity for recovered oil.
5. Properly conducting the exercise considering the size of a small discharge, including the skill and competency of responders and material readiness of response equipment.

The failure to achieve any one sub-objective should not automatically indicate that an exercise is a failure. EPA personnel evaluating the exercise should assess:

1. The plan holder's ability to conduct proper notifications.
2. Material readiness of response equipment.
3. The overall ability of responding personnel to mobilize, arrive on scene in a timely manner, properly deploy the containment boom, simulate recovery of oil, and demonstrate skill and competency during the 4-hour exercise window.

The EPA exercise evaluator will have a subjective role in determining the success of the exercise based on the achievement of the exercise objectives within the specified time. These evaluations will be dependent on spill site and circumstances. EPA personnel may request to review records of previous FRP exercises when there is a concern that the response time is excessive. As the result of an unsuccessful exercise, the EPA may require the plan holder to participate in additional GIUEs, revise the existing FRP, or both. Unsuccessful GIUEs may also result in enforcement action against the plan holder.

### 2.3.8 Plan Holder Triennial Exercise Cycle

**All components of a response plan must be exercised during the triennial exercise cycle.**

Rather than requiring each plan holder to conduct an all-encompassing major exercise every three years, the PREP cycle is designed for the various individual components to be exercised in portions through a series of required exercises.

#### SPECIAL NOTE REGARDING EXERCISE CYCLES

*The exercise cycle for facility and vessel response plans is three years (codified in federal regulations). The Area exercise cycle is not addressed in regulations and by policy is set at four years.*

### 2.3.8.1 Exercise Plan Components

The Core Components that must be exercised during the triennial cycle are listed in Appendix A of these Guidelines. Since not all of the components in Appendix A are necessarily applicable to each and every plan, the plan holder should review the list of components in the appendix, and identify those that are applicable to their specific plan, as appropriate. The plan holder would then be responsible for ensuring that all of those components identified are exercised within each triennial exercise cycle.

These plan components may be exercised in segments over a period of three years, as long as each component of the plan is exercised at least once within the three-year period.

The plan holder is responsible for documenting the components completed in each exercise.

### 2.3.8.2 Plan Holder Exercise Cycle

In the triennial cycle, at a minimum, the following exercises must be conducted:

1. Quarterly QI notification exercises. Vessels are required to conduct one each quarter while in U.S. waters.
2. Annual remote assessment and consultation exercises per vessel or barge fleet.
3. Quarterly emergency procedure exercises. For vessels, half (6) should address SMFF scenarios. Emergency procedures exercises are optional for all facilities.
4. Annual IMT exercise; one exercise per triennial cycle must involve a WCD scenario.
5. Annual shore-based salvage exercises per plan and annual shore-based MFF management team exercises per plan. Note that MFF exercises do not apply to NTVs with oil capacities of less than 250 barrels.
6. Annual plan holder-initiated unannounced exercises, which may be emergency spill procedures, IMT exercises, or OSRO equipment deployment exercises. BSEE plan holders are excluded. Note that plan holder-initiated unannounced exercises are not required for BSEE-regulated facilities.
7. Semiannual additional plan holder-initiated unannounced exercises for plans with vessels having SMFF requirements, of which three are emergency SMFF procedure exercises and three are SMFF equipment deployment exercises.
8. Equipment Deployment Exercises:
  - a. For vessel/facility owned and operated equipment: Semiannual plan holder owned and operated equipment deployment exercises (for plan holders with vessel/facility owned and operated equipment identified in their response plan).
  - b. For vessels and facilities with OSROs identified for response equipment: Annual OSRO equipment deployment exercises.
  - c. For plan holders of vessels that have SMFF requirements: Annual SMFF equipment deployment exercises.
  - d. For PHMSA-regulated facilities or pipelines: Annual facility or pipeline equipment deployment exercises, using either OSRO and/or operator owned equipment.
  - e. For BSEE-regulated offshore facilities: Annual equipment deployment exercises for equipment staged onshore. Semiannual equipment deployment exercises for equipment staged offshore.



## **2.3.9 Special Considerations**

### **2.3.9.1 Fleet Plans**

If an industry plan holder has developed one response plan that covers a fleet of vessels or regional offshore platform operations, this plan holder would only be required to conduct one "set" of exercises for the plan, with the exception of the QI notification exercises (required for all vessels and facilities), SMFF remote assessment and consultation exercises, and the emergency procedures exercises (required for all manned vessels and unmanned tank barges).

### **2.3.9.2 Complexes**

Complexes are facilities that must meet the requirements of more than one federal agency. For example, a facility that has oil storage tanks, a pipeline, and a waterfront oil transfer dock is considered to be a complex since it must meet the requirements of EPA, PHMSA, and the USCG.

Complexes would only be required to conduct one exercise to meet all agency requirements for that particular type of exercise. For example, if a quarterly notification exercise is required by all three agencies regulating the complex, one notification exercise per quarter would satisfy the requirements for all three regulatory agencies.

### **2.3.9.3 Vessels Serving as Secondary Carriers of Oil**

Vessels serving as secondary carriers of oil should comply with the exercise requirements in 33 CFR § 155.1045(g).

### **2.3.9.4 Trans-Alaska Pipeline Authorization Act Vessels and Facilities**

Trans-Alaska Pipeline Authorization Act (TAPAA) vessels and facilities, in addition to complying with the primary exercise requirements, must comply with the additional exercise requirements identified in the VRP and FRP regulations at 33 CFR §§ 155.1125(a)(2) and 154.1125(a)(2), respectively.

### **2.3.9.5 Foreign Vessels Calling Only Occasionally at U.S. Ports**

If a vessel plan holder has a VRP prepared with the intent that the vessel would occasionally call on U.S. ports, the vessel plan holder must have an exercise program. If the plan holder is following the PREP Guidelines, all exercises must be conducted at the frequency listed in the PREP Guidelines. The only exceptions to this requirement are the QI notification exercise and remote assessment and consultation exercise, which are only required to be conducted while operating in U.S. waters, otherwise upon entry into U.S. waters.

If a vessel enters U.S. waters for the first time but intends to continue trading, it must conduct the QI notification and remote assessment and consultation exercises immediately, and then begin its exercise program. Since PREP follows the calendar year, the triennial cycle should begin as soon as the vessel enters U.S. waters. The vessel should remain on the calendar year schedule (e.g., the next January 1 would begin Year 2 of the vessel's triennial cycle). For the first year, the plan holder must complete one QI notification and one emergency procedures exercise each quarter during that year. Only one remote assessment and consultation exercise

is required each year. IMT and equipment deployment exercises are recommended as soon as possible, but can be held up to 11 months after the date of the first entry into U.S. waters.

If the vessel only intends to make one voyage into U.S. waters, the vessel must conduct the QI notification and the remote assessment and consultation exercise immediately upon entry. If the vessel intends to reenter U.S. waters at any time, it must comply with all exercise requirements.

#### **2.3.9.6 Railroad Tank Cars and Motor Vehicle Tank Trucks**

Section 5 of these Guidelines (DOT/PHMSA-Regulated Facilities and Pipelines) is suitable for certain transportation-related facilities located landward of the coastline. For additional information on response planning requirements for railroad tank cars and motor vehicle tank trucks transporting oil, see 49 CFR § 130. A railroad tank car or a tank truck that transfers oil to or from certain vessels may be considered to be a mobile MTR facility and may be subject to the response planning requirements in 33 CFR § 154. The loading and offloading of railroad tank cars and tank trucks at certain non-transportation-related facilities may be covered by response plans prepared by a facility owner or operator subject to the requirements contained in 40 CFR § 112.

#### **2.3.9.7 Group V Oils or Oils That May Exhibit Similar Qualities When Discharged into the Environment**

Due to the rapid expansion of Group V oils within the U.S. energy market, transportation of Group V oils or oils that may exhibit similar qualities has increased. Therefore, plan holders carrying Group V oils or oils that may exhibit similar qualities are highly encouraged to carry out emergency procedure exercises, equipment deployment exercises, and IMT exercises focused on scenarios involving Group V oil or oils that may exhibit similar qualities.

#### **2.3.9.8 Vessels Serving as Facilities**

MODUs, Mobile Inland Drilling Units (MIDUs) and floating production, storage, and offloading (FPSO) vessels may be properly characterized as both facilities and vessels. They may be regulated by more than one agency with respect to different functions or systems, and each agency will have its own authority concerning these functions and systems. As such, it is up to each agency to provide guidance regarding the applicability of the PREP Guidelines. When MODUs and FPSO vessels are attached to the seabed for the purpose of exploring for, developing, or producing oil and gas, the offshore facility PREP Guidelines administered by BSEE apply to the systems and operations pertaining to these purposes. For vessel-oriented systems that may cause oil spills on MODUs and FPSO, the vessel PREP Guidelines administered by USCG apply. BSEE and the USCG will work closely together to ensure a coordinated approach to PREP guidance and oversight with respect to these vessels whenever possible. For the purposes of PREP, MIDUs are regulated by EPA.

## 2.4 Area-level Exercises

### 2.4.1 Equipment Deployment Drills

Equipment deployment drills at the Area level historically involved USCG and EPA "first aid" response equipment trailers and the USCG's prepositioned Vessel of Opportunity Skimming Systems (VOSS) and shipboard Spilled Oil Recovery Systems (SORS) equipment. While SORS and VOSS deployment drills for National Strike Force and Outside the Contiguous United States (OCONUS)-located units will continue, deployments of VOSS systems as well as "first aid" equipment in pre-positioned response trailers located throughout the contiguous United States will no longer be required as part of the quadrennial Area exercise cycle.

### 2.4.2 IMT Discussion-Based Exercises

Area-level IMT discussion-based exercises should be conducted annually to test the preparedness of the members of the Area Committee who will participate in an IMT and oversee the implementation of the ACP during an incident. An IMT discussion-based exercise does not need to be conducted the same year that the Area Committee conducts its quadrennial operations-based FE/FSE.

### 2.4.3 Operations-Based, Functional or Full-Scale Exercises (FE/FSEs)

**Area FE/FSEs, which exercise and test the overall preparedness of the *Area Contingency Plans, are conducted on a quadrennial schedule.*** The purpose of the Area FE/FSE is to exercise the ACP and the response community in a particular Area. The response community is comprised of the federal, state, and local government, industry, and tribal invitees. The Area FE/FSEs are also designed to exercise the government and industry interface for spill response or response to a significant threat of a spill.

The goal of the PREP is to conduct an Area FE/FSE for each ACP during each quadrennial cycle. The design and execution of such exercises is a collaborative process involving the FOOSC, the Area Committee, and industry. Division of labor and level of effort among all government and industry stakeholders is exercise-specific. The lead exercise planning role may be filled by either USCG or EPA, industry, or a combination thereof. However, it is important that the design team composition includes all appropriate stakeholders. A joint exercise design team should be comprised of representatives from the federal, state, and local government agencies, the local response community, and an industry plan holder. If applicable, tribal entities will be invited to participate. The lead planning element, if one is designated, will coordinate the overall execution of the Area FE/FSE; however, it remains the ultimate responsibility of the Area Committee under the direction of the FOOSC. The lead planning partner and the Area Committee Chair will share the final decision-making authority for the design of the exercise, including the scope and scenario.

A *suggested* mix of participants for industry plan holder participation in Area FE/FSEs would include vessels, MTR facilities, onshore and certain offshore non-transportation-related facilities, pipelines, and offshore facilities. Any industry participants should claim PREP credit toward their triennial cycle requirements for participation in an Area FE/FSE.

The Area FE/FSEs do not have to be a WCD scenario. The primary purpose of the Area FE/FSE is to activate and observe the response infrastructure in the Area and the ability of the response

community to respond effectively to a spill or a significant threat of a spill. The focus should be on the interaction between the industry plan holder as the RP and the federal, state, and local government to exercise the ACP consistent with the NCP and in coordination with the RP's response plan.

The following are recommendations for the Area FE/FSEs:

1. Each exercise should be approximately 8–12 hours in duration and may be longer if agreed to by the exercise design team.
2. The Area's response mechanisms would be evaluated in each Area FE/FSE, including the implementation of a UC capable of responding to a complex National Incident Management System (NIMS) Type 3 incident scenario.
  - a. In a complex Type 3 incident:
    - i. Multiple operational periods are expected.
    - ii. Response resources may be required from out of the Area, including regional and/or national resources.
    - iii. Most or all of the command and general staff positions are filled.
    - iv. A written IAP is required for each operational period.
    - v. At least one WCD capability must be tested.
3. The exercise scenario may involve some amount of equipment deployment, which should be determined by the lead planning partner after consulting with the exercise design team.

It is recommended that equipment deployments during an Area FE/FSE should test various response strategies contained in the ACP and relevant geographic response strategies (this includes existing Geographic Response Plans (GRPs)). Equipment deployments can include, but are not limited to:

1. Protective booming for shoreline, fish, wildlife, and sensitive environmental areas;
2. Fast-water, open-water, or shallow-water containment and collection; or
3. Dispersant or ISB operations.

Equipment deployment drills do not need to be conducted simultaneously with an IMT-focused, discussion-based portion of the exercise. They may be done several weeks or even months before or after the IMT portion to allow more efficient allocation of exercise planning and resources.

An industry plan holder that participates in an Area FE/FSE should not be required to participate in another Area FE/FSE for a minimum of six years.

Each exercise partner is responsible for funding their own participation in Area FE/FSE.

An After Action Report should be completed no later than 60 days after the completion of the Area FE/FSE. The After Action Report is completed by a joint evaluation team. The results of

Area FE/FSEs within the coastal zone will be entered in the Coast Guard's lessons learned database for exercises (Contingency Preparedness System (CPS)).

#### **2.4.4 Area Exercise Scheduling**

Scheduling of Area FE/FSEs will be done under a nationally coordinated system that involves the federal, state, and local governments and industry plan holders, and that recognizes the unique needs of specific geographic regions of the country.

**For EPA Areas with Subarea plans or annexes to the ACP, the EPA Regional Administrator shall decide which Subarea plan is to be exercised.**

#### **2.4.5 PREP Compliance, Coordination and Consistency Committee (PREP 4C)**

The PREP 4C is responsible for scheduling Area FE/FSEs. The PREP 4C is comprised of personnel representing the four federal regulating agencies:

1. USCG;
2. EPA;
3. PHMSA; and
4. BSEE.

#### **2.4.6 Scheduling Process**

The PREP 4C is charged with developing and publishing a proposed Area FE/FSE schedule for each quadrennial exercise cycle. This proposed schedule will be posted and announced on the PREP 4C Website. Area FE/FSEs are scheduled in advance to allow both Area Committees and industry plan holders to allocate sufficient funds and personnel resources to plan and conduct the exercises. The PREP 4C will solicit comments on the proposed schedule and industry plan holders to lead and participate in the Area FE/FSEs. It is important to note that the PREP 4C only proposes which ACPs will be exercised during the given exercise cycle. It is incumbent on the Area Committees with jurisdiction over an Area to validate the proposed timeframe and to identify the industry plan holder who will participate in the exercise. Each Area Committee should work with the local industry to identify industry plan holders in advance of the scheduled exercise. Industry plan holders may also provide input into the scheduling process through the Area Committees.

#### **2.4.7 Other Credit Considerations**

##### **2.4.7.1 Credit for Response**

###### **2.4.7.1.1 Credit for Plan Holder Response**

Plan holders may take credit for responses to actual spills or releases, or to significant threats of a spill, instead of conducting exercises. The response must be evaluated. The plan holder must determine which exercise requirements were met during the response. This determination should be based on whether the response effort would meet the objectives of the exercise requirements as listed in the PREP Guidelines.

#### 2.4.7.1.2 Area FE/FSE Credit for Response

Authorized PREP 4C agency representatives may grant credit for responses to actual spills or releases in lieu of conducting Area FE/FSEs based on the recommendations of the FOSC. Area FE/FSE credit may be given for participation in an actual response to a discharge of oil or release of a hazardous substance, pollutant, or contaminant if the following circumstances exist:

1. The ACP was used in the response.
2. The response involved the appropriate members of the response community in a UC structure.
3. The objectives of an Area FE/FSE were met as outlined in the PREP Guidelines.
4. The response was evaluated.
5. The response was properly documented, including detailed information on how each of the major objectives listed in the report were met.
6. The names of all OSROs and SMFF providers activated, a listing of the equipment deployed, and the following information included:
  - a. A copy of the initial Incident Action Plan (IAP), Incident Command System (ICS) Form 202; and
  - b. A discussion of the spill response procedures that were used.

Requests for credit should be routed through the appropriate agency (EPA or USCG) for submission to the PREP 4C. The PREP 4C convenes quarterly.

#### 2.4.7.2 Proper Documentation for Self-Certification of Plan Holder Exercises

Proper documentation for self-certification of an exercise should include, at a minimum, the following information:

1. Type;
2. Date and time;
3. Description;
4. Objectives met;
5. Core components (from Appendix A) exercised; and
6. Lessons learned.

This documentation must be in writing and signed by an authorized representative of the plan holder organization.

Sample documentation may be available online at the USCG National Strike Force Coordination Center (NSFCC) website.

As a general rule, exercise documentation should be completed within 60 days of the exercise, although this may vary depending upon exercise complexity.

## SECTION 3.0

### USCG-REGULATED VESSELS AND MARINE TRANSPORTATION-RELATED FACILITIES

**PREP Guidelines do not create binding legal requirements.**

While the PREP Guidelines have been developed with the regulated community, they are not legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of OPA 90. An alternative program can also be acceptable, subject to approval by the USCG Office of Marine Environmental Response (CG-MER) in accordance with the applicable response plan exercise regulations:

- Facility Response Plans (33 CFR § 154.1055)
- Tank Vessel Response Plans (33 CFR § 1060)
- Salvage and Marine Firefighting (33 CFR § 155.4052)
- Nontank Vessel Response Plans (33 CFR §§ 155.5060 and 155.5061)

3.1	DRILL: QI Notification – MTR Facility
<b>Applicability:</b>	Facility.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel and QI.
<b>Scope:</b>	Exercise communications between facility personnel and QI.
<b>Objectives:</b>	Voice contact and confirmation must be made with a QI as detailed in the plan. Electronic messaging may be used only if communication by voice is not possible.
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records to be kept at the facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.



3.2	DRILL: QI Notification – Manned Vessel
<b>Applicability:</b>	Manned tank vessels and NTVs carrying oils as cargo or fuel.
<b>Frequency:</b>	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not to exceed four times per year. The QI notification exercise is not required for ships outside U.S. waters.
<b>Initiating Authority:</b>	Master or designee according to the procedure established in the VRP.
<b>Participating Elements:</b>	Vessel personnel, plan-designated shore-side personnel, including a vessel's QI.
<b>Scope:</b>	Exercise communication between vessel personnel and QI.
<b>Objectives:</b>	Contact by telephone or radio and confirmation must be made with a QI as detailed in the plan. Electronic messaging may be used only if communication by voice is not possible.
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	On board the vessel. These exercises may be documented in the vessel log or may be kept in a separate exercise log.
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine if objectives have been met.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.3	DRILL: QI Notification – Unmanned Tank Barge
<b>Applicability:</b>	Unmanned tank barge.
<b>Frequency:</b>	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not to exceed four times per year. The QI notification exercise is not required for tank barges outside U.S. waters.
<b>Initiating Authority:</b>	Tank barge owner or operator or designee, according to the procedure established in the VRP.
<b>Participating Elements:</b>	Tank barge custodian, plan-designated shore-side personnel, and QI.
<b>Scope:</b>	Exercise communication between tank barge custodian and QI.
<b>Objectives:</b>	<p>A. Contact by telephone or radio and confirmation must be made with a QI as detailed in the plan. Electronic messaging may be used only if communication by voice is not possible.</p> <p>B. Exercises should be conducted randomly to ensure that all tank barge custodians have an equal chance to participate in the notification exercises.</p>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records to be kept on board the barge or with the VRP for the barge.
<b>Evaluation:</b>	<p>Self-evaluation.</p> <p>Owner or operator should conduct a review to determine if objectives have been met.</p>
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.4	DRILL: Remote Assessment and Consultation – Manned Vessel
<b>Applicability:</b>	Manned tank vessels and NTVs carrying oils as cargo or fuel. Note: NTVs with a capacity of less than 250 barrels of oil are not required to plan SMFF resources for fire scenarios, and their exercises should be designed accordingly.
<b>Frequency:</b>	Annually while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, no less than one time per vessel per year. The remote assessment and consultation exercise is not required for vessels operating outside U.S. waters.
<b>Initiating Authority:</b>	Vessel owner or operator, vessel master, or designee, according to the procedure established in the VRP.
<b>Participating Elements:</b>	VRP-designated vessel and shore-side personnel for activation of and provision of remote assessment and consultation services.
<b>Scope:</b>	Contact the SMFF remote assessor by telephone, radio, or other means of communications to discuss a shipboard response scenario as detailed in the VRP. Electronic messaging may be used for the initial contact only if communication by voice is not possible.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Following VRP notification/activation procedures, the information communicated from the vessel to the remote assessor identifies a general scenario type from the VRP's shipboard emergency procedures section (e.g., collision, excessive list, fire). Confirm that remote assessor has the VRP shipboard emergency procedures section of the VRP.</li> <li>B. Remote assessment and consultation for a fire scenario must be exercised once in every three year exercise cycle, except for NTVs with oil capacity less than 250 barrels, which are exempt from planning for fire response. The remote assessor listed in the VRP (identified by contract and funding agreement) advises the vessel what on-scene situational information would facilitate his or her preliminary assessment of the vessel's status, given the type of scenario.</li> <li>C. Vessel and assessor establish a communication process that would support completion of the vessel's stability and structural integrity assessment through the use of a salvage software program and identify the software program.</li> <li>D. For all applicable vessels and where there are different remote assessment resources contracted for salvage and for MFF, alternate an annual exercise involving the salvage remote assessor with an annual exercise involving the MFF remote assessor.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Onboard the vessel. Records must also be maintained at the U.S. location of the QI, the vessel owner or operator, the IMT, or the SMFF provider, as designated in the VRP.
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct a review to determine if objectives have been met.
<b>Credit:</b>	<p>NOTE: These exercises are to be conducted separately from the quarterly QI notification exercises but may be held in conjunction with a shipboard emergency procedures exercise.</p> <p>Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.</p>

3.5	DRILL: Remote Assessment and Consultation – Unmanned Tank Barge
<b>Applicability:</b>	Vessel custodian for unmanned tank barges carrying oil as cargo or fuel.
<b>Frequency:</b>	While operating in U.S. waters including the EEZ, no less than one annual exercise for individual tank barges, or quarterly exercises for tank barge fleets covered by one response plan. The remote assessment and consultation exercise is not required for vessels operating outside U.S. waters.
<b>Initiating Authority:</b>	Tank barge owner or operator, or designee, according to the procedure established in the VRP.
<b>Participating Elements:</b>	Vessel custodian and a vessel's VRP-designated shore-side personnel for activation of remote assessment and consultation services.
<b>Scope:</b>	Contact the SMFF remote assessor, by telephone, radio, or other means of communications to discuss a barge response scenario as detailed in the VRP. Electronic messaging may be used for the initial contact only if communication by voice is not possible.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Following VRP notification/activation procedures, the information communicated from the vessel custodian to the remote assessor identifies a general scenario type from the VRP's shipboard emergency procedures section (e.g., collision, excessive list, fire).</li> <li>B. Remote assessment and consultation for a fire scenario must be exercised at least once in every three year exercise cycle.</li> <li>C. The remote assessor listed in the VRP (identified by contract and funding agreement) advises the vessel custodian what on-scene situational information would facilitate his or her preliminary assessment of the vessel's status, given the type of scenario.</li> <li>D. Vessel and assessor establish a communication process that would support completion of the vessel's stability and structural integrity assessment through the use a salvage software program.</li> <li>E. For all applicable vessels and where there are different remote assessment resources contracted for salvage and for MFF, alternate an annual exercise involving the salvage remote assessor with an annual exercise involving the MFF remote assessor.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records to be kept on board the barge or with the VRP for the barge.
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine whether or not objectives have been met.
<b>Credit:</b>	<p>NOTE: These exercises are to be conducted separately from the quarterly QI notification exercises but may be held in conjunction with a shipboard emergency procedures exercise.</p> <p>Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.</p>

3.6	DRILL: On Board Emergency Procedures – Manned Vessels
<b>Applicability:</b>	Manned tank vessels and NTVs carrying oil as cargo or fuel.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Master or designee, according to the procedure established in the VRP.
<b>Participating Elements:</b>	Vessel personnel.
<b>Scope:</b>	Exercise the emergency procedures for the vessel crew to mitigate or prevent any discharge or a substantial threat of such discharge of oil as described in the shipboard spill mitigation procedures section of the VRP.
<b>Objectives:</b>	<p>A. Conduct an exercise of the vessel's emergency procedures to ensure crew knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the crew's actions.</p> <p>B. Exercise should involve one or more of the emergency scenarios/procedures described in the shipboard spill mitigation section of the VRP.</p> <p>C. Annually ensure that spill mitigation procedures for contingencies identified in the VRP have been exercised and, for vessels with SMFF requirements, half of the exercises address emergency procedures with an SMFF component.</p>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention</b>	Three years.
<b>Records Location:</b>	Logbook entry. These exercises may be documented in the vessel log or may be kept in a separate exercise log.
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine whether or not objectives have been met.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.7	DRILL: Emergency Procedures – Tank Barges
<b>Applicability:</b>	Tank barge(s).
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Tank Barge owner or operator, or designee, according to the procedure established in the VRP.
<b>Participating Elements:</b>	Tankerman or designee, as established in the VRP.
<b>Scope:</b>	Exercise the emergency procedures to mitigate or prevent any discharge or a substantial threat of such discharge of oil as described in the shipboard spill mitigation procedures section of the VRP.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Conduct a walk-through of the emergency procedures.</li> <li>B. Ensure tank barge custodians know proper actions to take in the event of an oil discharge or substantial threat of such discharge, including incidents requiring SMFF response.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	These exercises may be documented in the vessel log or may be kept in a separate exercise log. Records to be kept on board the tank barge or with the VRP for the tank barge
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine whether or not objectives have been met.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.8	DRILL: Emergency Procedures – MTR Facilities (optional) *
<b>Applicability:</b>	Facility.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel.
<b>Scope:</b>	Exercise the emergency procedures for the facility to mitigate or prevent any discharge, or a substantial threat of such discharge, of oil resulting from facility operational activities associated with oil transfers.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the emergency procedures.</li> <li>B. Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example, the exercise should involve a simulation of a response to an oil spill.</li> <li>C. The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At each facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

*\*This section describes an optional exercise to provide facilities with an exercise that may be conducted unannounced to fulfill the requirement for a plan holder-initiated unannounced exercise.*

3.9	TTX: Incident Management Team Exercise – MTR Facilities
<b>Applicability:</b>	Facility IMT.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	IMT as established in the response plan.
<b>Scope:</b>	Exercise the IMT's organization, communication, and decision-making in managing a spill response.
<b>Objectives:</b>	<p>Exercise the IMT in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the response plan;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access an OSRO;</li> <li>E. Coordination of internal organization personnel with responsibility for spill response;</li> <li>F. Annual review of the transition from a local team to a regional, national, and international team as appropriate;</li> <li>G. Ability to effectively coordinate spill response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the IMT should demonstrate knowledge of response coordination with the NRS);</li> <li>H. Ability to access information in the ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.; and</li> <li>I. Minimum of one IMT exercise in a triennial cycle must involve simulation of a WCD scenario.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At each facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	<p>Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.</p> <p>Plan holders are responsible for ensuring that IMTs are familiar with Area Committees/RRTs and ACPs in every Area in which the plan holder operates. While it is not practicable to require an IMT to exercise in every Area/region in which they offer coverage each year, each IMT is expected to review ACPs annually and the makeup of Area Committees/RRTs in all Areas in which they offer coverage. Self-certification for exercise credit should include IMT certification that the IMT has completed an annual review and is familiar with the ACPs and Area Committees/RRTs in all Areas in which the plan holder operates.</p>



3.10	TTX: Incident Management Team Exercise – Tank and Certain NTVs
<b>Applicability:</b>	Tank vessels and NTVs carrying oil as cargo or fuel.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	Company policy.
<b>Participating Elements:</b>	IMT as established in the VRP.
<b>Scope:</b>	Exercise the IMT's organization, communication, and decision-making in managing a response.
<b>Objectives:</b>	<p>Exercise the IMT in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the response plan;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access resource providers;</li> <li>E. Coordination of internal organization personnel with responsibility for response;</li> <li>F. Annual review of the transition from a local team to a regional, national, and international team as appropriate;</li> <li>G. Ability to effectively coordinate response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the IMT should demonstrate knowledge of response coordination with the NRS);</li> <li>H. Ability to access information in the ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.;</li> <li>I. Minimum of one IMT TTX in a triennial cycle must involve simulation of a WCD scenario;</li> <li>J. For any chemical or biological countermeasures or <i>in-situ</i> burning cited in the VRP, the ability to prepare and submit a request and usage plan to the FOSC/RRT. Each such countermeasure listed in the plan will be exercised during the triennial cycle; and</li> <li>K. When applicable to submit a request for aerial/vessel applied dispersants, American Petroleum Institute (API) Technical Report 1148 contains an example of a Daily Aerial/Vessel Dispersant Application Plan that may be appropriate for use in this situation.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At the U.S. location of the QI, IMT, vessel owner/operator, resource provider, as established in the VRP.
<b>Evaluation:</b>	<p>Self-evaluation.</p> <p>Owner or operator should conduct review to determine whether or not objectives have been met.</p>
<b>Credit:</b>	<p>Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.</p> <p>Plan holders are responsible for ensuring that IMTs are familiar with Area Committees/RRTs and ACPs in every Area in which the plan holder operates.</p>

3.11	TTX: Shore-based Salvage Exercise
<b>Applicability:</b>	Tank vessels and NTVs carrying oil as cargo or fuel.
<b>Frequency:</b>	One salvage exercise per year.
<b>Initiating Authority:</b>	Company policy.
<b>Participating Elements:</b>	Salvage management team as established in the response plan.
<b>Scope:</b>	Exercise the management team's organization, communication, and decision-making in managing a salvage response.
<b>Objectives:</b>	<p>Exercise the salvage management team in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the response plan;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access a salvage provider;</li> <li>E. Coordination of internal organization personnel with responsibility for spill prevention and salvage: <ul style="list-style-type: none"> <li>1. Remote assessment and consultation;</li> <li>2. Begin assessment of structural stability;</li> <li>3. On-site salvage assessment;</li> <li>4. Assessment of structural stability;</li> <li>5. Hull and bottom survey;</li> <li>6. Emergency towing;</li> <li>7. Salvage plan;</li> <li>8. External emergency transfer operations;</li> <li>9. Emergency lightering (not required for NTVs under 250 barrel oil capacity);</li> <li>10. Other refloating methods;</li> <li>11. Making temporary repairs;</li> <li>12. Diving services support;</li> <li>13. Special salvage operations plan;</li> <li>14. Subsurface product removal; and</li> <li>15. Heavy lift.</li> </ul> </li> <li>F. Annual review of the transition from a local team to a commercial, regional, national, and international team as appropriate;</li> <li>G. Ability to coordinate response activity effectively with the IMT and NRS infrastructure (if personnel from the IMT or NRS are not participating in the exercise, the response team should demonstrate knowledge of response coordination with the IMT or NRS); and</li> <li>H. Ability to access information in the ACP for resources available within the area, unique conditions of the area, etc.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At the U.S. location of the QI, IMT, the vessel owner or operator, or primary salvage provider, as indicated in the VRP.

<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine whether or not objectives have been met.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.12	TTX: Shore-based Marine Firefighting Exercise
<b>Applicability:</b>	Tank vessels and NTVs carrying oil as cargo or fuel. (Not required for NTVs with an oil capacity of less than 250 barrels.)
<b>Frequency:</b>	One MFF exercise per year.
<b>Initiating Authority:</b>	Company policy.
<b>Participating Elements:</b>	MFF management team as established in the response plan.
<b>Scope:</b>	Exercise the management team's organization, communication, and decision-making in managing an MFF response.
<b>Objectives:</b>	<p>Exercise MFF management team in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the response plan and when exercising the MFF team, the pre-fire plan;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access a MFF provider;</li> <li>E. Coordination of internal organization personnel with responsibility for spill prevention and MFF;</li> <li>F. Remote assessment and consultation;</li> <li>G. On-site fire assessment;</li> <li>H. External firefighting teams;</li> <li>I. External vessel firefighting systems.</li> <li>J. Annual review of the transition from a local team to a commercial, regional, national, and international team as appropriate;</li> <li>K. Ability to coordinate response activity effectively with the IMT and NRS infrastructure (if personnel from the IMT or NRS are not participating in the exercise, the response team should demonstrate knowledge of response coordination with the IMT or NRS); and</li> <li>L. Ability to access information in the ACP for resources available within the area, unique conditions of the area, etc.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At the U.S. location of the QI, IMT, the vessel owner or operator, or primary MFF provider, as indicated in the VRP.
<b>Evaluation:</b>	<p>Self-evaluation.</p> <p>Owner or operator should conduct review to determine whether or not objectives have been met.</p>
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.13	DRILL: Equipment Deployment – MTR Facilities (Facility-owned equipment)
<b>Applicability:</b>	Facilities with facility-owned and operated response equipment.
<b>Frequency:</b>	Semiannually.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel.
<b>Scope:</b>	<p>A. Deploy and operate facility-owned and operated response equipment identified in the response plan. The equipment to be deployed would be the equipment necessary to respond to an AMPD at the facility.</p> <p>B. All of the facility's personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.</p>
<b>Objectives:</b>	<p>A. Demonstrate ability of facility personnel to deploy and operate equipment.</p> <p>B. At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>C. Ensure equipment is in proper working order.</p>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records to be kept at facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

**Note:** If a facility with facility-owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO-owned equipment.

3.14	DRILL: Equipment Deployment – MTR Facilities (OSRO-owned equipment)
<b>Applicability:</b>	Facilities with OSRO response equipment cited in their response plan.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility owner or operator and OSRO.
<b>Scope:</b>	<p>A. Deploy and operate response equipment identified in the response plan for an AMPD response.</p> <p>B. All OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers' recommendations and best commercial practices. The OSRO must provide inspection and maintenance information to the owner or operator.</p> <p>C. Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each USCG Contingency Planning Area.</p>
<b>Objectives:</b>	<p>A. Demonstrate the ability of the personnel to deploy and operate equipment.</p> <p>B. At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>C. Ensure the response equipment is in proper working order.</p>
<b>Certification:</b>	The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records to be kept at the facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

3.15	DRILL: Equipment Deployment – Vessels (OSRO and SMFF equipment)
<b>Applicability:</b>	Vessels with OSRO and SMFF equipment cited in their plans.
<b>Frequency:</b>	Annual OSRO exercise and Annual SMFF exercise.
<b>Initiating Authority:</b>	Company policy.
<b>Participating Elements:</b>	Vessel owner or operator and OSRO, or vessel owner or operator and SMFF provider.
<b>Scope:</b>	<ul style="list-style-type: none"> <li>A. Deploy and operate OSRO or SMFF response equipment identified in the response plan for an AMPD response. There is no minimum amount of equipment prescribed for SMFF exercises.</li> <li>B. All OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The vessel owner or operator must ensure that equipment inspection and maintenance is documented. OSROs must provide inspection and maintenance information to the vessel owner or operator.</li> <li>C. SMFF providers are encouraged to develop and implement a comprehensive training program for their personnel, and implement a comprehensive maintenance program for their equipment, which should be made available to vessel owners and operators.</li> <li>D. Plan holders must ensure that when a regional OSRO or SMFF provider is identified in the response plan, the OSRO or SMFF provider conducts annual equipment deployment exercises in each operating environment for each USCG Contingency Planning Area.</li> </ul>
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Demonstrate the ability of the personnel to deploy and operate response equipment.</li> <li>B. At least annually, conduct deployment of dispersant application resources, if applicable.</li> <li>C. Ensure the response equipment is in proper working order.</li> </ul>
<b>Certification:</b>	The vessel owner or operator should ensure that the OSRO and SMFF resource providers identified in the response plan provide adequate documentation that the requirements for this exercise have been met.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	At the U.S. location of the QI, IMT, vessel owner or operator, OSRO, or SMFF provider, as indicated in the VRP.
<b>Evaluation:</b>	Self-evaluation. Owner or operator should conduct review to determine whether or not objectives have been met.
<b>Credit:</b>	<p>Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.</p> <p>SMFF providers may document operational deployment of their equipment for credit when these objectives are met, the deployment is evaluated, and a proper record is generated.</p>

3.16	FE+DRILL: Government-Initiated Unannounced Exercise – MTR Facilities
<b>Applicability:</b>	MTR FRP holders within the Area.
<b>Frequency:</b>	As selected; plan holders who have successfully completed a GIUE will not be required to participate in another one for at least 36 months from the date of the exercise.
<b>Initiating Authority:</b>	USCG.
<b>Participating Elements:</b>	MTR, and Mobile MTR FRP holders.
<b>Scope:</b>	<p>A. Unannounced exercises are limited to a maximum of four exercises per Area per year.</p> <p>B. Exercises are limited to approximately four hours in duration.</p> <p>C. Exercises must involve response to an AMPD scenario.</p>
<b>Objectives:</b>	<p>Conduct proper notifications and equipment deployment to respond to an unannounced scenario of an AMPD. Demonstrate that the response is:</p> <ol style="list-style-type: none"> <li>1. Timely: As a general rule, the regulatory planning standard is containment equipment (e.g., booms) on scene within one hour of notification and recovery equipment (e.g., skimmers and temporary storage) on scene within two hours. Therefore, in a GIUE, a plan holder should be able to initiate a simulated cleanup or SMFF response within approximately two hours of exercise commencement;</li> <li>2. Conducted with adequate amount of equipment deployed for the given scenario; and</li> <li>3. Properly conducted.</li> </ol>
<b>Certification:</b>	USCG COTP/FOSC.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention</b>	Three years.
<b>Records Location:</b>	At the facility.
<b>Evaluation:</b>	Evaluation to be conducted by initiating agency.
<b>Credit:</b>	Plan holder may receive credit for other required exercises (a QI notification, equipment deployment exercise, and unannounced exercise) if the GIUE is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.



3.17	FE+DRILL: Government-Initiated Unannounced Exercise – Vessels
<b>Applicability:</b>	Vessel response plan holders within the Area.
<b>Frequency:</b>	As selected; plan holders who have successfully completed a GIUE will not be required to participate in another one for at least 36 months from the date of the exercise. USCG does not routinely require SMFF providers to participate in unannounced exercises. USCG has and reserves the authority to conduct and require a plan holder’s SMFF provider to participate in a USCG GIUE.
<b>Initiating Authority:</b>	USCG.
<b>Participating Elements:</b>	Vessel.
<b>Scope:</b>	<ul style="list-style-type: none"> <li>A. Unannounced exercises are limited to a maximum of four exercises per Area per year.</li> <li>B. Exercises are limited to approximately four hours in duration.</li> <li>C. Exercises must involve response to an AMPD scenario.</li> <li>D. SMFF scenarios are applicable only to tank vessels and NTVs and to unmanned tank barges carrying oil.</li> </ul>
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Conduct proper notifications and equipment deployment to respond to an unannounced scenario of an AMPD. Demonstrate that the response is: <ul style="list-style-type: none"> <li>1. Timely: As a general rule, the regulatory planning standard is containment equipment (e.g., booms) on scene within one hour of notification and recovery equipment (e.g., skimmers and temporary storage) on scene within two hours. Therefore, in a GIUE, a plan holder should be able to initiate a simulated cleanup or SMFF response within approximately two hours of exercise commencement;</li> <li>2. Conducted with adequate amount of equipment deployed for the given scenario;</li> <li>3. Properly conducted.</li> </ul> </li> <li>B. SMFF scenarios should include mobilization of remote and on-site salvage assessment personnel, and initiation of the assessment processes. For firefighting scenarios, this includes making the applicable vessel pre-fire plan accessible to firefighting personnel.</li> </ul>
<b>Certification:</b>	USCG COTP/FOSC.
<b>Verification:</b>	USCG COTP/FOSC.
<b>Records Retention</b>	Three years.
<b>Records Location:</b>	In accordance with 33 CFR § 155.1060(e)(2).
<b>Evaluation:</b>	Evaluation to be conducted by initiating agency.
<b>Credit:</b>	Plan holder may receive credit for other required exercises (a QI notification, equipment deployment exercise, and unannounced exercise) if the GIUE is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

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## SECTION 4.0

### EPA-REGULATED NON-TRANSPORTATION-RELATED ONSHORE AND OFFSHORE FACILITIES LOCATED LANDWARD OF THE COASTLINE

**PREP Guidelines do not create binding legal requirements.**

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of OPA 90. An alternative program can also be acceptable, subject to approval by the EPA Regional Administrator (see 40 CFR § 112.21). Either the PREP Guidelines or the EPA-approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

Note: For purposes of the PREP guidelines, the use of “inland” in the header for the following exercises includes non-transportation-related onshore and offshore facilities located landward of the coastline.

4.1	DRILL: QI Notification – Inland Facility
<b>Applicability:</b>	Facility.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel and QI.
<b>Scope:</b>	Exercise communications between facility personnel and QI.
<b>Objectives:</b>	Voice contact and confirmation must be made with a QI as detailed in the plan. Electronic messaging may be used only if communication by voice is not possible.
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	Records to be kept at the facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

4.2	DRILL: Emergency Procedures – Inland Facilities (optional)*
<b>Applicability:</b>	Facility.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel.
<b>Scope:</b>	Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational activities associated with oil transfers.
<b>Objectives:</b>	<p>A. Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the emergency procedures.</p> <p>B. Exercise should involve one or more of the sections of the emergency procedures for spill mitigation; e.g., the exercise may involve a simulation of a response to an oil spill.</p> <p>C. Facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</p>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	At each facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

*\*This is offered as an optional exercise to provide facilities with an exercise that may be conducted unannounced to fulfill the requirement for plan holder-initiated unannounced exercises.*

4.3	TTX: Incident Management Team Exercise – Inland Facilities
<b>Applicability:</b>	Facility IMT.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	IMT as established in the response plan.
<b>Scope:</b>	Exercise the IMT's organization, communication, and decision-making in managing a response.
<b>Objectives:</b>	<p>Exercise the IMT in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the response plan;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access an OSRO;</li> <li>E. Coordination of internal organization personnel with responsibility for response;</li> <li>F. Annual review of the transition from a local team to a regional, national, and international team as appropriate;</li> <li>G. Ability to effectively coordinate response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the IMT should demonstrate knowledge of response coordination with the NRS);</li> <li>H. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.; and</li> <li>I. Minimum of one IMT exercise in a triennial cycle would involve simulation of a WCD scenario.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	At each facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

4.4	DRILL: Equipment Deployment – Inland Facilities (Company-owned equipment)
<b>Applicability:</b>	Facilities with company-owned and operated response equipment and facilities with company-owned response equipment, but operated by the OSRO.
<b>Frequency:</b>	Semiannually.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility personnel.
<b>Scope:</b>	<p>A. Deploy and operate facility-owned and operated response equipment identified in the response plan. The equipment to be deployed would be the equipment necessary to respond to a small discharge at the facility.</p> <p>B. All of the facility personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.</p>
<b>Objectives:</b>	<p>A. Demonstrate ability of facility personnel to deploy and operate equipment.</p> <p>B. Ensure equipment is in proper working order.</p>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	Records to be kept at the facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

**Note:** If a facility with facility owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO-owned equipment.

4.5	DRILL: Equipment Deployment – Inland Facilities (OSRO-owned equipment)
<b>Applicability:</b>	Facilities with OSRO response equipment cited in their response plan.
<b>Frequency:</b>	Annual.
<b>Initiating Authority:</b>	Facility owner or operator.
<b>Participating Elements:</b>	Facility owner or operator and OSRO.
<b>Scope:</b>	<p>A. Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the equipment necessary to respond to a small discharge at the facility.</p> <p>B. All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The OSRO must provide inspection and maintenance information to the owner or operator.</p> <p>C. Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each USCG or EPA Contingency Planning Area, or EPA Subarea (where identified).</p>
<b>Objectives:</b>	<p>A. Demonstrate the ability of the personnel to deploy and operate response equipment.</p> <p>B. Ensure the response equipment is in proper working order.</p>
<b>Certification:</b>	The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	Kept at the facility.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.



4.6	FE+DRILL: Government-Initiated Unannounced Exercises – Inland Facilities
<b>Applicability:</b>	EPA-regulated FRP holders within the region.
<b>Frequency:</b>	As selected; plan holders who have successfully completed a PREP GIUE will not be required to participate in another one for at least 36 months from the date of the exercise.
<b>Initiating Authority:</b>	EPA.
<b>Participating Elements:</b>	EPA-regulated FRP holders.
<b>Scope:</b>	<ul style="list-style-type: none"> <li>A. Unannounced exercises are limited to a maximum of 10 percent of response plan holders per EPA region per year.</li> <li>B. Exercises are limited to approximately four hours in duration.</li> <li>C. Exercises should involve response to a small discharge scenario (assume 2,100 gallons outside secondary containment and discharged into or on navigable waters and adjoining shorelines).</li> <li>D. Exercises should involve deployment of response equipment identified in the FRP to respond to the spill scenario.</li> </ul>
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Conduct proper notifications to respond to unannounced scenario of a small discharge.</li> <li>B. Demonstrate that the response is:               <ul style="list-style-type: none"> <li>1. Timely, as defined in Section 2 of these Guidelines;</li> <li>2. Conducted with adequate amount of equipment for the scenario; and</li> <li>3. Properly conducted.</li> </ul> </li> </ul>
<b>Certification:</b>	EPA.
<b>Verification:</b>	EPA.
<b>Records Retention:</b>	Five years.
<b>Records Location:</b>	Kept at the facility.
<b>Evaluation:</b>	Evaluation to be conducted by initiating agency.
<b>Credit:</b>	Plan holder may receive credit for other required exercises (a QI notification, equipment deployment exercise, and unannounced exercise) if the GIUE is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

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## SECTION 5.0

### DOT/PHMSA-REGULATED FACILITIES AND PIPELINES

**PREP Guidelines do not create binding legal requirements.**

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of OPA 90. An alternative program can also be acceptable as described in the applicable regulation (for pipelines see 49 CFR § 194.107(c)(1)(ix); for other regulated facilities see 49 CFR § 130). Either the PREP Guidelines or the approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

5.1	DRILL: QI Notification
<b>Applicability:</b>	Plan holder.
<b>Frequency:</b>	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (quarterly).
<b>Initiating Authority:</b>	Plan holder. NOTE: DOT/PHMSA may have the operator conduct a QI notification exercise as part of a regulatory inspection of the facility.
<b>Participating Elements:</b>	Facility response personnel and the facility's QI.
<b>Scope:</b>	Exercise the notification process between key facility personnel and the QI to demonstrate notification processes and the accessibility of the QI.
<b>Objectives:</b>	Voice contact and confirmation must be made with a QI as detailed in the plan. Electronic messaging may be used only if communication by voice is not possible.
<b>Certification:</b>	Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.
<b>Verification:</b>	Verification by DOT/PHMSA; records must be available upon request.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Plan holder shall retain records as indicated in response plan.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

5.2	TTX: Incident Management Team Exercise
<b>Applicability:</b>	Plan holder IMT.
<b>Frequency:</b>	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (annually).
<b>Initiating Authority:</b>	Plan holder.
<b>Participating Elements:</b>	Designated spill emergency response team members. Plan holders are encouraged to notify their DOT/PHMSA regional office at least one month in advance of conducting their PREP exercises. When possible, DOT/PHMSA will participate and evaluate their exercise.
<b>Scope:</b>	Exercise the IMT's organization, communication, and decision-making in managing a response.
<b>Objectives:</b>	Exercise the IMT in a review of: A. Knowledge of the response plan; B. Proper notifications; C. Communication system; D. Ability to access an OSRO; E. Coordination of internal organization personnel with responsibility for response; F. Annual review of the transition from a local team to a regional, national, and international team as appropriate; G. Ability to effectively coordinate response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the IMT should demonstrate knowledge of response coordination with the NRS); H. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.; and I. Minimum of one IMT exercise in a triennial cycle would involve simulation of a WCD scenario.
<b>Certification:</b>	Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document, whichever is more stringent. Each plan should have a written description of the company's certification process.
<b>Verification:</b>	Verification by DOT/PHMSA; records must be available upon request.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Plan holder shall retain records as indicated in response plan.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

5.3	DRILL: Equipment Deployment
<b>Applicability:</b>	Plan holder.
<b>Frequency:</b>	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (quarterly).
<b>Initiating Authority:</b>	Plan holder.
<b>Participating Elements:</b>	Designated response personnel. Plan holders are encouraged to notify their DOT/PHMSA regional office at least one month in advance of conducting their PREP exercises. When possible, DOT/PHMSA will participate and evaluate their exercise.
<b>Scope:</b>	Demonstrate the ability to deploy response equipment* identified in the FRP.
<b>Objectives:</b>	Designated emergency response personnel should demonstrate the ability to: A. Organize; and B. Deploy and operate representative types of key response equipment as described in the response plan.
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	Verification by DOT/PHMSA; records must be available upon request.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Plan holder shall retain records as indicated in response plan.
<b>Evaluation:</b>	Self-evaluation.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

*\*May consist entirely of operator-owned equipment, or a combination of OSRO and operator equipment.*

5.4	FE+DRILL: Government-Initiated Unannounced Exercise
<b>Applicability:</b>	Plan holder.
<b>Frequency:</b>	PREP Guidelines require that operators conduct at least one of their exercises unannounced annually (see Section 2). DOT/PHMSA has and reserves the authority to conduct and require an operator to participate in a GIUE. (Plan holders who have successfully completed a GIUE will not be required to participate in another one for at least 36 months from the date of the exercise.)
<b>Initiating Authority:</b>	DOT/PHMSA.
<b>Participating Elements:</b>	<ul style="list-style-type: none"> <li>A. Operator-designated spill emergency response team members.</li> <li>B. Operations staff.</li> <li>C. On-Scene Coordinator (optional).</li> <li>D. Federal, state, and other government agencies (optional).</li> </ul>
<b>Scope/Format:</b>	<ul style="list-style-type: none"> <li>A. Demonstrate the ability to respond to a WCD spill event.</li> <li>B. Unannounced exercise to discuss strategic issues.</li> <li>C. On the day of the exercise, the pipeline owner or operator will be provided the scenario and post-spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.</li> </ul>
<b>Objectives:</b>	Designated emergency response team members should demonstrate adequate knowledge and understanding of their FRP and the ability to organize, communicate, coordinate, and respond in accordance with that plan. Initiate and demonstrate use of a UC, consistent with NIMS.
<b>Certification:</b>	DOT/PHMSA will evaluate the conduct and achievement of objectives for the exercises and provide certification of the exercise to the owner/operator.
<b>Verification:</b>	DOT/PHMSA.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Plan holder shall retain records as indicated in response plan.
<b>Evaluation:</b>	DOT/PHMSA.
<b>Credit:</b>	Plan holder may receive credit for other required exercises (a QI notification, equipment deployment exercise, and unannounced exercise) if the GIUE is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

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## SECTION 6.0

### BSEE-REGULATED OFFSHORE FACILITIES

While the PREP Guidelines have been developed with multiple iterations of public review and comment occurring through the *Federal Register*, the PREP Guidelines are not, by themselves, legally binding rules. Plan holders may adopt the implementing guidance contained within the PREP Guidelines to fulfill their exercise requirements under OPA 90, or they may propose an alternative program subject to the approval of BSEE OSPD. Either the PREP Guidelines or the BSEE OSPD-approved exercise program developed by the plan holder become binding when referenced in the submitted oil spill response plan (OSRP).

6.1	DRILL: QI Notification – Offshore Facility
<b>Applicability:</b>	24-hour manned offshore facilities.
<b>Frequency:</b>	On an annual basis and within two weeks after initiating production operations on a 24-hour manned offshore facility. For MODUs (such as drill ship, jack-up rigs, etc.) that will be engaged in drilling or down hole operations, within two weeks after movement on location and annually thereafter while at this location, as applicable.
<b>Initiating Authority:</b>	Owner or operator.
<b>Participating Elements:</b>	Facility personnel and QI.
<b>Scope:</b>	Exercise and test communications between personnel on each offshore facility manned on a 24-hour basis and QI; information to be provided in the event of a spill must be simulated during this exercise/drill.
<b>Objectives:</b>	<p>Voice contact and confirmation must be made with a QI as detailed in the OSRP. Electronic messaging may be used only if communication by voice is not possible.</p> <p>All pertinent information must be communicated in a timely manner as outlined within the approved OSRP and should include as many of the following elements of information as possible that are known at the time of the notification call:</p> <ul style="list-style-type: none"> <li>A. Incident location: Indicate county, state, and latitude and longitude of release;</li> <li>B. Released material: Indicate name of material released, quantity released, and quantity in the water;</li> <li>C. Brief description of incident;</li> <li>D. Incident details: Include platform rig name or platform or pipeline number, MODU name, location area ID, block number, Outer Continental Shelf (OCS) lease number or state lease number;</li> <li>E. Sheen information: Include color, direction traveling, size, leading edge;</li> <li>F. Impact: Indicate if fire is involved and, if so, whether it is extinguished; document injuries or fatalities and if evacuation(s) occurred;</li> <li>G. Remedial action: Indicate if source is secure and whether steps have been taken for source control or spill response;</li> <li>H. Weather: Describe weather conditions, wind speed, wave conditions, speed and direction of currents;</li> <li>I. Agency notifications: Indicate any local/state/federal agencies that have been notified;</li> <li>J. Additional Information: Describe threats to personnel, biological resources, or the environment and any other pertinent information not previously covered; and</li> <li>K. Identify corrections and incorporate them into your OSRP to address any problems encountered while conducting the notification exercise.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	Verification by BSEE; records must be available upon request.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records are to be maintained at the offshore facility or at a corporate location designated in the OSRP.
<b>Evaluation:</b>	Self-evaluation of objectives.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

6.2	FE: Incident Management Team Exercise – Offshore Facilities
<b>Applicability:</b>	IMT.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	Owner or operator.
<b>Participating Elements:</b>	IMT and plan holder company officials as established in the spill response plan.
<b>Scope:</b>	Exercise the IMT’s organization, communication, and decision-making in managing a response.
<b>Objectives:</b>	<p>Exercise a select combination of the Core Components as outlined within Appendix A of the PREP Guidelines. During each triennial cycle, all of the applicable Core Components in Appendix A need to be exercised at least once.</p> <p>In addition, effective demonstration of any of the following components may be included in the scenario for the exercise:</p> <ul style="list-style-type: none"> <li>A. Ability to detect, assess, project, track and monitor the spill, properly map the spill information necessary to respond, direct response resources appropriately, and share that information with others as indicated in the response plan.</li> <li>B. Knowledge of OSRP, any referenced OSRO Inventories, tactics manuals, and well containment plans.</li> <li>C. Ability to access information in the appropriate Regional Contingency Plans (RCPs) and ACPs for the location of sensitive areas, protective best management practices, resources available within the area, unique conditions of area, recommended response strategies, etc.</li> <li>D. For any chemical or biological countermeasures or <i>in-situ</i> burning cited in the OSRP, the ability to prepare and submit a request and usage plan to the FOSC. The preparation of a usage and monitoring plan/request for each such countermeasure listed in the plan must be exercised during the triennial cycle. <ul style="list-style-type: none"> <li>1. Ability to select and propose the use of an optimal mix of response countermeasures to the FOSC, based on an assessment of the operational feasibility, expected effectiveness, and projected environmental tradeoffs associated with using each countermeasure.</li> <li>2. In the case of a request for aerial/vessel applied dispersants, API Technical Report 1148 (“Aerial and Vessel Dispersant Preparedness and Operations Guide”) contains an example of a Daily Aerial/Vessel Dispersant Application Plan that may be appropriate for use in this situation.</li> <li>3. For OSRPs that also list SSDI as a response capability; the IMT should complete an application request and usage and monitoring plan for SSDI, as well as a management plan for coordinating the allocation of dispersant stockpiles between surface-application and SSDI operations, as appropriate.</li> <li>4. Ability to implement and coordinate the use of multiple response countermeasures, as approved by the FOSC, in accordance with the offshore response Concept of Operations outlined in the OSRP.</li> </ul> </li> <li>E. Demonstrate the effective and coordinated integration of source control and subsea containment operations with other incident management activities, including oil spill response operations.</li> <li>F. Identification of corrections necessary to address any noncompliance or preparedness issues encountered while conducting the exercise and the incorporation of these corrections into the OSRP.</li> </ul>
<b>Certification:</b>	Self-certification.
<b>Verification:</b>	Verification by BSEE; records must be available upon request.

<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records are to be maintained at a corporate location designated in the spill response plan.
<b>Evaluation:</b>	Self-evaluation. BSEE may evaluate if the exercise is witnessed.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

6.3	DRILL: Equipment Deployment – Offshore Facility (Equipment staged offshore)
<b>Applicability:</b>	OSRO or owner or operator response equipment required to be or voluntarily staged offshore.
<b>Frequency:</b>	<p>On a semiannual basis and within 30 days after initial equipment placement. Notification of date equipment will be staged offshore must be made to the BSEE Chief, OSPD, or designee prior to equipment placement.</p> <p>For wells being drilled from MODUs, at least once while the MODU is on each location and within 30 days of beginning operations if staged response equipment is required by the BSEE Chief, OSPD, or voluntarily placed by the owner operator.</p>
<b>Initiating Authority:</b>	OSRO, or owner or operator.
<b>Participating Elements:</b>	Facility or SROT identified within the OSRP.
<b>Scope:</b>	Deploy and operate response equipment that is staged offshore and identified in the OSRP. Each type of this equipment is to be deployed annually. Each type need not be deployed at each exercise.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Demonstrate ability of spill response personnel to conduct timely and proper mobilization, deployment, and operation of equipment in a safe manner.</li> <li>B. Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment’s defined operating specifications during the exercise.</li> <li>C. Evaluate deployment strategies under various spill scenarios.</li> <li>D. Identify corrections necessary to address any noncompliance or preparedness issues encountered while conducting the exercise and the incorporation of these corrections into the OSRP.</li> </ul>
<b>Certification:</b>	Self-certification
<b>Verification:</b>	Verification by BSEE; records must be available upon request.
<b>Records Retention:</b>	Three years
<b>Records Location:</b>	Records are to be kept at the OSRO or at the facility or a corporate location designated in approved OSRP for owner or operator equipment.
<b>Evaluation:</b>	Self-evaluation of objectives; BSEE may evaluate if the exercise is witnessed.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

6.4	DRILL: Equipment Deployment – Offshore Facility (Equipment staged onshore)
<b>Applicability:</b>	OSRO or owner or operator response equipment stored at an onshore location that is cited in an OSRP submitted to BSEE for review and approval.
<b>Frequency:</b>	Deployment exercises/drills must be conducted at a minimum on an annual basis and within 30 days after initial placement per type of equipment. Each type of equipment being staged onshore must be deployed at least once during a plan holder’s triennial exercise cycle. Where exercise credit is extended to all clients for a contracted OSRO’s deployment exercise, each type of response equipment being deployed in this manner should be deployed and exercised on an annual basis.
<b>Initiating Authority:</b>	OSRO, or owner or operator.
<b>Participating Elements:</b>	OSRO, SROT, and/or owner or operator personnel.
<b>Scope:</b>	Deploy and operate response equipment that is stored onshore and identified in the OSRP. It is not necessary to deploy each piece of equipment.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Demonstrate ability of spill response personnel to conduct timely and proper mobilization, deployment, and operation of equipment in a safe manner as outlined in the Guiding Principles for Equipment Deployment Exercises (Section 2).</li> <li>B. Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment’s defined operating specifications during the exercise.</li> <li>C. Evaluate deployment strategies under various spill scenarios.</li> <li>D. Identify corrections necessary to address any noncompliance or preparedness issues encountered while conducting the exercise and the incorporation of these corrections into the OSRP.</li> </ul>
<b>Certification:</b>	Self-certification: OSRO for OSRO equipment and owner or operator for owner or operator equipment.
<b>Verification:</b>	Verification by BSEE; records must be available upon request.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	Records are to be kept at the OSRO or at the offshore facility or a corporate location designated in approved OSRP for owner or operator equipment.
<b>Evaluation:</b>	Self-evaluation of objectives; BSEE may evaluate if the exercise is witnessed.
<b>Credit:</b>	Plan holder may claim credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit may be claimed for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

6.5	<b>DRILL: Equipment Deployment – Offshore Facility (Source control, subsea containment, and SSDI equipment)</b>
<b>Applicability:</b>	Contractor or owner or operator equipment for source control, subsea containment, SSDI, and all supporting equipment as necessary to implement actions to control and secure the source, or mitigate the discharge as cited within a BSEE-regulated OSRP. The use of SSDI is considered a means to mitigate the discharge, and is not considered a means of source control.
<b>Frequency:</b>	As deemed necessary by the BSEE Chief, OSPD, to test spill response preparedness. If the exercise is voluntarily conducted by a source control, subsea containment, and SSDI equipment provider, the BSEE Chief, OSPD, should be provided 60 days’ notice prior to the date of the planned exercise.
<b>Initiating Authority:</b>	BSEE Chief, OSPD; source control, subsea containment, or SSDI equipment provider; or owner or operator.
<b>Participating Elements:</b>	Source control, subsea containment, SSDI, and supporting equipment providers, contractors, facility personnel, QIs, state and local government, other federal agencies, and/or owner or operator personnel.
<b>Scope:</b>	Deploy, operate, and evaluate source control, subsea containment, SSDI equipment that is identified in the OSRP as requested by the BSEE Chief, OSPD, in order to test spill response preparedness, or as deemed necessary by an owner/operator or the source control, subsea containment, or SSDI equipment provider. If the exercise is initiated by the BSEE Chief, OSPD, the parameters (e.g., location, onshore or offshore, water depth, types of equipment to be exercised, drill protocols) for the exercise will be provided to the source control, subsea containment, or SSDI equipment providers by the BSEE Chief, OSPD. Due to the potentially extensive nature and complexity of exercising this type of equipment, BSEE will consult whenever possible with industry regarding the planning for any BSEE-initiated deployment exercises that will involve source control, subsea containment, or SSDI equipment.
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Demonstrate ability of source control, subsea containment, or SSDI personnel to conduct timely and proper mobilization, deployment, and operation of equipment in a safe manner.</li> <li>B. Evaluate the ability to procure in a timely manner all of the support equipment and services necessary to ensure an effective source control, subsea containment, or SSDI response.</li> <li>C. Evaluate the operating condition and the ability to achieve the equipment’s defined operating specifications during the exercise.</li> <li>D. Evaluate deployment strategies under various spill release scenarios.</li> <li>E. Identify of any corrections necessary to address any noncompliance or preparedness issues encountered while conducting the exercise and the incorporation of these corrections into the OSRP.</li> </ul>
<b>Certification:</b>	BSEE.
<b>Verification:</b>	BSEE.
<b>Records Retention:</b>	Indefinite.
<b>Records Location:</b>	BSEE will maintain records at the BSEE OSPD Section Office that executed any BSEE-initiated deployment exercise, or as directed by records management protocols. The owner or operator and/or source control and subsea containment equipment provider will also maintain records at a corporate location identified in the approved OSRP for any deployment exercises conducted as per this section.
<b>Evaluation:</b>	Evaluation of objectives to be conducted by BSEE.
<b>Credit:</b>	Credit may be requested for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

6.6	Government-Initiated Unannounced Exercise – Offshore Facilities *
<b>Applicability:</b>	Offshore facilities.
<b>Frequency:</b>	An offshore facility will not undergo a BSEE-initiated unannounced exercise more than once every 36 months, unless the BSEE Chief, OSPD, determines that the results of an exercise or response to real time incidents warrant a more frequent evaluation, or an emerging concern arises necessitating that BSEE test the preparedness and viability of the contents of a newly submitted or existing OSRP.
<b>Initiating Authority:</b>	BSEE.
<b>Participating Elements:</b>	Facility personnel, QI, IMT, OSROs, SROT, source control, and subsea containment, or SSDI equipment and service providers, state and local government and other federal agencies (optional).
<b>Scope:</b>	Exercise will require that the owner or operator respond to a spill scenario posed by the BSEE Chief, OSPD, or designee. These unannounced exercises may consist of either (1) an IMT exercise, (2) a deployment exercise/drill using equipment staged onshore, or (3) an IMT exercise combined with the deployment of equipment staged onshore and/or offshore.
<b>Objectives:</b>	<p><b>A. IMT Exercise</b> The owner or operator will be requested by BSEE to demonstrate a select combination of the Core Components outlined within Appendix A of the PREP Guidelines. Each drill will use an unannounced scenario that will be designed to test these selected Core Components.</p> <p>In addition, effective demonstration of any of the following components may be included in the unannounced scenario for the exercise:</p> <ol style="list-style-type: none"> <li>1. Demonstrate the ability to detect, track and monitor the spill, and determine the size or flow rate of a discharge;</li> <li>2. Demonstrate knowledge of the OSRP and any referenced OSRO inventories, tactics manuals, and well containment plans;</li> <li>3. Demonstrate the ability to access information in the appropriate RCPs and ACPs for the location of sensitive areas, protective best management practices, response resources available within the area, unique conditions of area, recommended response strategies, etc.;</li> <li>4. Demonstrate the ability, through the appropriate procurement of resources and planning, to use the equipment and techniques necessary to secure and mitigate the threat of a discharge of oil and protect potentially impacted resources; and</li> <li>5. Demonstrate the effective and coordinated integration of source control and subsea containment operations with other incident management activities, including oil spill response operations.</li> </ol> <p><b>B. Deployment exercise/drill using equipment staged onshore and/or offshore</b> The deployment exercise is intended to:</p> <ol style="list-style-type: none"> <li>1. Demonstrate ability of response personnel to conduct timely and proper mobilization, deployment and operation of selected spill response and source control equipment in a safe manner, including any and all supporting logistical platforms, systems, and services;</li> <li>2. Demonstrate the ability of spill response personnel to employ response techniques and methodologies that would enhance spill response capability and/or serve to protect environmentally sensitive or economic resources;</li> <li>3. Evaluate the operating condition and the ability to achieve the deployed equipment’s defined operating specifications during the exercise;</li> <li>4. Evaluate deployment strategies under the unannounced spill scenario; and</li> <li>5. Effectively direct oil removal, protection, or mitigation operations using oil spill surveillance and tracking resources.</li> </ol> <p><b>C. IMT exercise combined with deployment of equipment staged onshore and/or offshore</b></p> <ol style="list-style-type: none"> <li>1. The objectives as outlined in numbers 1 and 2 of this section.</li> </ol>
<b>Certification:</b>	BSEE.



<b>Verification:</b>	BSEE.
<b>Records Retention:</b>	Three years.
<b>Records Location:</b>	BSEE will maintain records at the BSEE OSPD Section Office that conducted the exercise. The owner or operator will maintain records at the corporate locations identified in the approved OSRP.
<b>Evaluation:</b>	Evaluation of objectives to be conducted by BSEE.
<b>Credit:</b>	Plan holder may receive credit for other required exercises (a QI notification, equipment deployment exercise, and unannounced exercise) if the GIUE is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

*\*GIUEs conducted by BSEE may be a IMT FE, an equipment deployment drill, or a combination of a IMT FE and an equipment deployment drill.*

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**SECTION 7.0**

**AREA/OSC EXERCISES**

<b>7.1</b>	<b>DRILL: Quarterly Area Notification</b>
<b>Applicability:</b>	Area.
<b>Frequency:</b>	Quarterly.
<b>Initiating Authority:</b>	FOSC.
<b>Participating Elements:</b>	Key elements of the UC (appropriate federal, state and local government agencies).
<b>Scope:</b>	Exercise and test communication between the OSC and key elements of the UC.
<b>Objectives:</b>	<p>A. Ensure that the key elements of the UC know who to call in the event of a discharge, including discharges and significant threats of discharges with SMFF implications, within the Area.</p> <p>B. Ensure contact by telephone or electronic messaging and that confirmation is made between the OSC and key elements of the UC.</p>
<b>Certification:</b>	FOSC.
<b>Verification:</b>	FOSC.
<b>Records Retention</b>	Four years (USCG). Five years (EPA).
<b>Records Location:</b>	With FOSC.
<b>Evaluation:</b>	By Area Committee.
<b>Credit:</b>	Credit may be requested for an actual response when these objectives are met, the response is evaluated, and a proper record is generated (see Section 2.13.1.2 of these Guidelines).

7.2	TTX: Incident Management Team Exercise – Area IMT
<b>Applicability:</b>	Area IMT.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	FOSC.
<b>Participating Elements:</b>	IMT for the Area (USCG or EPA and respective response team) and state(s).
<b>Scope:</b>	Exercise the IMT's organization, communication, and decision-making in managing a spill and/or SMFF response in a discussion-based exercise.
<b>Objectives:</b>	<p>Exercise the IMT in a review of:</p> <ul style="list-style-type: none"> <li>A. Knowledge of the ACP;</li> <li>B. Proper notifications;</li> <li>C. Communications system;</li> <li>D. Ability to access response equipment;</li> <li>E. Coordination of organization or agency personnel with responsibility for response;</li> <li>F. Ability to effectively coordinate spill and/or SMFF response activity with NRS infrastructure;</li> <li>G. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of the area, etc.;</li> <li>H. Exercise the response management system identified in the ACP and, to the extent possible, the UC;</li> <li>I. For any chemical and biological countermeasures or <i>in-situ</i> burning cited in the ACP, the ability to prepare requests for and make recommendations to the FOSC regarding the use of these countermeasures. Each such countermeasure identified in the ACP should be exercised during the quadrennial cycle; and</li> <li>J. Minimum of one IMT exercise in a quadrennial cycle would involve simulation of a WCD scenario.</li> </ul>
<b>Certification:</b>	FOSC.
<b>Verification:</b>	FOSC.
<b>Records Retention</b>	Four years (USCG). Five years (EPA).
<b>Records Location:</b>	With FOSC.
<b>Evaluation:</b>	By Area Committee.
<b>Credit:</b>	Credit may be requested for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

<b>7.3</b>	<b>DRILL: Equipment Deployment – Area Committee</b>
<b>Applicability:</b>	Area Committee.
<b>Frequency:</b>	Annually.
<b>Initiating Authority:</b>	FOSC.
<b>Participating Elements:</b>	Local Area response community (appropriate federal, state, and local response agencies).
<b>Scope:</b>	<p>A. SORS and VOSS deployment drills for USCG National Strike Force and OCONUS-located units will continue; deployments of VOSS systems as well as “first aid” equipment in pre-positioned response trailers located throughout the continental U.S. will no longer be required as part of the quadrennial Area exercise cycle.</p> <p>B. All response personnel must be included in a comprehensive training program, and all response equipment in a comprehensive maintenance program. The intent is to ensure maximum preparedness of both response personnel and equipment via the most efficient means. Credit should be taken for deployment of equipment during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices.</p>
<b>Objectives:</b>	<p>A. Demonstrate the ability of the response personnel to deploy and operate the equipment.</p> <p>B. Ensure that the response equipment is in proper working order.</p>
<b>Certification:</b>	FOSC.
<b>Verification:</b>	FOSC
<b>Records Retention</b>	Four years (USCG). Five years (EPA).
<b>Records Location:</b>	With FOSC.
<b>Evaluation:</b>	By Area Committee.
<b>Credit:</b>	Credit may be requested for an actual response when these objectives are met, the response is evaluated, and a proper record is generated.

7.4	FSE: Quadrennial Area Exercise
<b>Applicability:</b>	Area response community.
<b>Frequency:</b>	Quadrennial (for each Area). Scheduling of Area FE/FSEs will be done by the PREP 4C, using input from the FOSCs, Area Committees, and RRTs, in consultation with the industry. A national, multi-year PREP schedule comprised of FE/FSEs will be published on the NSFCC website. This will be updated on a regular basis (no less than semiannually).
<b>Initiating Authority:</b>	FOSC.
<b>Participating Elements:</b>	Appropriate federal, state, and local government, industry, and other members of the response community.
<b>Scope/Format:</b>	<ul style="list-style-type: none"> <li>A. Operations-based FE/FSEs will exercise all aspects of the Area response community, including the Area IMT, the ACP, equipment deployments, and the testing of relevant geographic response strategies.</li> <li>B. Area exercises should be <i>approximately</i> 8–12 hours in duration.</li> <li>C. Exercise scenario is to be developed by the exercise design team.</li> <li>D. To simulate realism, the exercise should be conducted in the command post that would be used for a response, whenever possible.</li> <li>E. Exercise may be in real or limited, compressed time and may start at any point during an incident, as determined by the exercise design team. Flexibility should be allowed to ensure that the exercise objectives are met.</li> <li>F. Lessons learned from the exercise shall be incorporated into each agency’s PREP Lessons Learned System (e.g., CGSAILS), whenever possible.</li> </ul>
<b>Objectives:</b>	<ul style="list-style-type: none"> <li>A. Exercise the ACP, along with selected industry response plans.</li> <li>B. Exercise the response management system identified in the ACP and, to the extent possible, the UC with the appropriate participants.</li> <li>C. Exercise the Area and industry IMTs.</li> <li>D. Deploy adequate response equipment for the exercise scenario. At a minimum, the scenario must involve responding to a complex ICS Type 3 incident scenario or greater (Type 2 or 1) with equipment deployment.</li> </ul>
<b>Certification:</b>	<ul style="list-style-type: none"> <li>A. The FOSC will certify completion of the Area FE/FSE. In certifying the Area exercise, the FOSC will consider the following: <ul style="list-style-type: none"> <li>1. Area FE/FSE was conducted;</li> <li>2. Area FE/FSE met the objectives outlined in the PREP Guidelines; and</li> <li>3. Area response community was exercised for response preparedness.</li> </ul> </li> <li>B. Participating industry plan holders should take credit for all of the applicable exercise activities that were completed during the Area FE/FSE. These exercises shall be self-certified by the plan holder.</li> </ul>
<b>Verification:</b>	FOSC.
<b>Records Retention:</b>	Four years (USCG). Five years (EPA).
<b>Records Location:</b>	With FOSC.
<b>Evaluation:</b>	By Area Committee.
<b>Credit:</b>	Credit may be requested for an actual response when these objectives are met, the response is evaluated, and a proper record is generated. Credit may be granted for hazardous substance (as defined in Clean Water Act) scenarios, provided relevant ACP sections were tested.

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## APPENDIX A: CORE COMPONENTS FOR EXERCISING RESPONSE PLANS

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During each triennial (quadrennial for ACPs) cycle, the following 15 core components must be exercised at least once for a response plan. All of these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

**A.1 Notifications:** Test the notifications procedures identified in the response plan being exercised.

**A.2 Staff Mobilization:** Demonstrate the ability to assemble the response organization identified in the response plan being exercised.

**A.3 Ability To Operate Within the Response Management System Described in the Plan:**

1. Unified Command: Demonstrate the ability of the response organization to work within a UC.
  - a. Federal Representation: Demonstrate the ability to consolidate the concerns and interests of the other members of the UC into a unified strategic plan with tactical operations.
  - b. State Representation: Demonstrate the ability to function within the UC structure.
  - c. Local Representation: Demonstrate the ability to function within the UC structure.
  - d. Responsible Party Representation: Demonstrate the ability to function within the UC structure.
2. Response Management System: Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.
  - a. Operations: Demonstrate the ability to coordinate or direct operations related to the implementation of action plans contained in the respective response and contingency plans developed by the UC.
  - b. Planning: Demonstrate the ability to consolidate the various concerns of the members of the UC into joint planning recommendations and specific long-range strategic plans. Demonstrate the ability to develop short-range tactical plans for the Operations Section.
  - c. Logistics: Demonstrate the ability to provide the necessary support of both the short-term and long-term action plans.

- d. Finance: Demonstrate the ability to document the daily expenditures of the organization and provide cost estimates for continuing operations.
- e. Public Affairs: Demonstrate the ability to form a Joint Information Center (JIC) and provide the necessary interface between the UC and the media.
- f. Safety Affairs: Demonstrate the ability to monitor all field operations and ensure compliance with safety standards.
- g. Legal Affairs: Demonstrate the ability to provide the UC with suitable legal advice and assistance.

**A.4 Source Control:** Demonstrate the ability of the response organization to control and stop the discharge at the source, and to effectively coordinate source control activities within the response management system used for the overall incident. Source control actions may involve specialized operations including, as applicable:

1. Salvage: Demonstrate the ability to assemble and deploy salvage resources identified in the VRP for the following salvage services:
  - a. Hull and bottom survey;
  - b. Emergency towing;
  - c. External emergency transfer operations;
  - d. Emergency lightering;
  - e. Other refloating methods;
  - f. Making temporary repairs;
  - g. Diving services support;
  - h. Subsurface product removal; and
  - i. Heavy lift.
2. Marine Firefighting (vessels): Demonstrate the ability to assemble and deploy the firefighting resources identified in the VRP for fire suppression.
  - a. External firefighting teams; and
  - b. External vessel firefighting systems.
3. Lightering: Demonstrate the ability to assemble and deploy the lightering resources identified in the response plan.
  - a. Emergency lightering (not applicable to NTVs under 250 barrel capacity).

4. Other Salvage Equipment and Devices: Demonstrate the ability to assemble and deploy the other salvage devices identified in the response plan.
  - a. Specialized salvage operations;
  - b. Special salvage operations plan;
  - c. Subsurface product removal; and
  - d. Heavy lift.
5. Well Control: Where applicable, demonstrate the ability to regain well control and secure the source of a discharge.

**A.5 Assessment:** Demonstrate the ability of the response organization to provide an initial assessment of the discharge or potential discharge and provide continuing assessments of the effectiveness of the tactical planning.

1. Salvage (vessels): Demonstrate the ability to assemble and deploy salvage assessment and consultation resources identified in the VRP for the following salvage services:
  - a. Remote salvage assessment and consultation;
  - b. On-site salvage assessment;
  - c. Assessment of structural stability;
  - d. Salvage plan; and
  - e. Special salvage operations plan.
2. Marine firefighting (vessels): Demonstrate the ability to assemble and deploy the firefighting assessment and planning resources identified in the VRP for the fire assessment and planning.
  - a. Remote fire assessment and consultation; and
  - b. On-site fire assessment.

**A.6 Containment:** Demonstrate the ability of the response organization to contain the discharge at the source or in various locations for recovery operations.

**A.7 Mitigation (formerly Recovery):** Demonstrate the ability of the response organization to mitigate the discharged product through the use of oil spill countermeasures, including, but not limited to, dispersants, *in-situ* burning, and bioremediation, in addition to mechanical oil recovery.

**A.8 Protection:** Demonstrate the ability of the response organization to protect the environmentally and economically sensitive areas identified in the ACP and the respective industry response plan.

1. Protective Booming: Demonstrate the ability to assemble and deploy sufficient resources to implement the protection strategies contained in the ACP and the respective industry response plan.
2. Water Intake Protection: Demonstrate the ability to quickly identify water intakes and implement the proper protection procedures from the ACP or develop a plan for use.
3. Wildlife Recovery and Rehabilitation: Demonstrate the ability to quickly identify these resources at risk and implement the proper protection procedures from the ACP to develop a plan for use.
4. Population Protection (Protect Public Health and Safety): Demonstrate the ability to quickly identify health hazards associated with the discharged product and the population at risk from these hazards, and to implement the proper protection procedures from the ACP to develop a plan for use.

**A.9 Disposal:** Demonstrate the ability of the response organization to dispose of the recovered material and contaminated debris.

**A.10 Communications:** Demonstrate the ability to establish an effective communications system for the response organization.

1. Internal Communications: Demonstrate the ability to establish an intra-organization communications system. This encompasses communications at the command post and between the command post and deployed resources.
2. External Communications: Demonstrate the ability to establish communications both within the response organization and other entities; e.g., RRT, claimants, media, regional or headquarters agency offices, and nongovernmental organizations.

**A.11 Transportation:** Demonstrate the ability to provide effective multimode transportation, both for execution of the discharge and support functions.

1. Land Transportation: Demonstrate the ability to provide effective land transportation for all elements of the response.
2. Waterborne Transportation: Demonstrate the ability to provide effective waterborne transportation for all elements of the response.
3. Airborne Transportation: Demonstrate the ability to provide effective airborne transportation for all elements of the response.

**A.12 Personnel Support:** Demonstrate the ability to provide the necessary support of all personnel associated with the response.

1. Management: Demonstrate the ability to provide administrative management of all personnel involved in the response. This requirement includes the ability to move personnel into or out of the response organization with established procedures.
2. Berthing: Demonstrate the ability to provide overnight accommodations on a continuing basis for a sustained response.
3. Messing: Demonstrate the ability to provide suitable feeding arrangements for personnel involved with the management of the response.
4. Operational and Administrative Spaces: Demonstrate the ability to provide suitable operational and administrative spaces for personnel involved with the management of the response.
5. Emergency Procedures: Demonstrate the ability to provide emergency services for personnel involved in the response.

**A.13 Equipment Maintenance and Support:** Demonstrate the ability to maintain and support all equipment associated with the response.

1. Response Equipment: Demonstrate the ability to provide effective maintenance and support for all response equipment.
2. Support Equipment: Demonstrate the ability to provide effective maintenance and support for all equipment that supports the response. This requirement includes communications equipment, transportation equipment, administrative equipment, etc.

**A.14 Procurement:** Demonstrate the ability to establish an effective procurement system.

1. Personnel: Demonstrate the ability to procure sufficient personnel to mount and sustain an organized response. This requirement includes ensuring that all personnel have qualifications and training required for their position within the response organization.
2. Response Equipment: Demonstrate the ability to procure sufficient response equipment to mount and sustain an organized response.
3. Support Equipment: Demonstrate the ability to procure sufficient support equipment to support and sustain an organized response.

**A.15 Documentation:** Demonstrate the ability of the response organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken.

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**APPENDIX B TO PREP GUIDELINES: EXERCISE REFERENCE MATRIX**

**OIL SPILL RESPONSE PLAN AS REQUIRED BY CWA:**

Vessel Response Plans	Coastal Zone Facility Response Plans	Inland Facility Response Plans	Onshore Pipeline Response Plans	Offshore Facility Response Plans	Area Contingency Plans
USCG	USCG	EPA	DOT-PHMSA	DOI-BSEE	USCG and EPA
33 CFR Part 155	33 CFR Part 154	40 CFR Part 112	49 CFR Part 194, Part 130	30 CFR Part 254	40 CFR Part 300

**PREP EXERCISES (ORGANIZED BY HSEEP\* EXERCISE TYPE)**

**Applicable Exercise Guidance Sections** (*specific guidance found on page number referenced*)

**DISCUSSION BASED EXERCISES (Type | Name)**

TTX	Incident Management Team Exercise – MTR Facilities		3-10			
TTX	Incident Management Team Exercise – Tank and Certain NTVs	3-11				
TTX	Shore-based Salvage Exercise	3-12				
TTX	Shore-based Marine Firefighting Exercise	3-14				
TTX	Incident Management Team Exercise – Inland Facilities			4-4		
TTX	Incident Management Team Exercise				5-3	
TTX	Incident Management Team Exercise – Area IMT					7-3

**OPERATIONS BASED EXERCISES (Type | Name)**

DRILL	QI Notification – MTR Facility		3-2			
DRILL	QI Notification – Manned Vessel	3-3				
DRILL	QI Notification – Unmanned Tank Barge	3-4				
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**KEY**

TTX = Table Top Exercise  
 FE = Functional Exercise  
 FSE = Full Scale Exercise

**NOTES**

\* HSEEP refers to the Homeland Security Exercise and Evaluation Program as defined by FEMA  
 \*\*GIUEs conducted by BSEE may be a IMT Functional Exercise, an Equipment Deployment Drill, or a combination of a IMT Functional Exercise and an Equipment Deployment Drill