

# Prevention First 2012

## Proposed Changes to Drills and Exercise Regulations



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# Introduction

- **D&E History**
- **Current Regulations**
- **Why Update Regulations**
- **Limitations of Existing Regulations**
- **Proposed New Regulations**
- **What's Next**
- **Questions?**

# Drills & Exercise Background

- **DFG-OSPR Drills and Exercise Program started 1998 (2 staff)**
- **D&E Program redesigned in 2006**
- **Comprehensive Contingency Plan D&E Program began in 2008 (7 staff)**
- **D&E staff supported by OSPR Field Response Teams and OSPR HQ staff**

# Current Regulations

- CCR, Title 14, Div 1, Subdiv 4, Ch 3, Subch 3, Section 820.01
- Link: <http://www.dfg.ca.gov/ospr>
- Evaluation of 15 PREP objectives, and
- Nine California specific objectives
- Notification and submittal deadlines included in regulations

# Why Update Regulations?

- **D&E staff and industry representatives have observed limitations with current regulations**
- **Demonstrate the ability to...**
  - **Subjective**
- **Make updated regulations “measurable and performance based”**

# Limitations of Existing Regulations I

The following are not discussed or referenced in regulations:

- ICS Forms of any kind
- IMH
- Planning “P”

Limited references in regulations:

- IAP
- ICS training (only referenced in IDM section)

# Limitations of Existing Regulations II

Currently, drill scheduling is not sustainable and does not allow for the OSPR support that plan holders need:

- 98 TTX & SED Drills held in Southern California in 2011
- 50% of these drills held between September and December (industry waits until the end of the year)
- Highlights include (2011):
  - 9 drills in one week (6 TTX & 3 SEDs)
  - 3 drills held on same day on two different occasions

# Congested Drill Calendar (example)

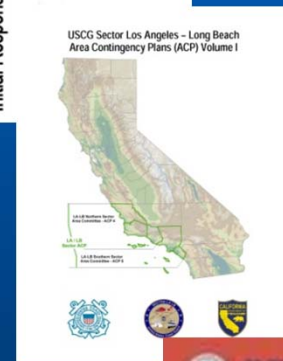
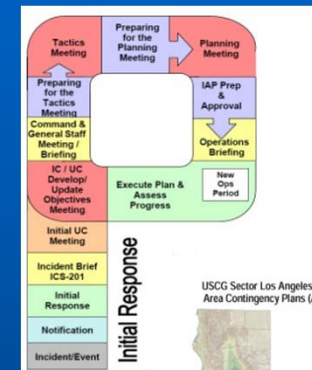
- November 2012, Southern California Drills
- 5 Nov – 9 Nov, 8 drills in one week (5 TTX & 3 SEDs)
- 12 Nov – 16 Nov, 7 drills in one week (6 TTX & 1 SED)

| November, 2012 |  |   |  |   |
|----------------|--|---|--|---|
| Monday         | Tuesday  | Wednesday   | Thursday   | Friday  |
| 29             | 30   | 31  | 1  | 2   |
| 5              | 6  | 7   | 8  | 9   |
| 9:30 AM PXP    | 8:00 AM Philips 66<br>1:00 PM Vopak Corp             | 7:30 AM PXP<br>8:00 AM Philips 66<br>10:00 AM Ribest/AES      | 9:00 AM Ancon Marine                               | 10:00 AM Trac Tide Marine                             |
| 12             | 13   | 14  | 15   | 16  |
|                | 9:30 AM PXP  | 8:00 AM Shell Pipeline<br>9:00 AM GD NASSCO<br>10:00 AM S-FRT | 8:00 AM Shell Pipeline<br>10:00 AM Weber Readiness | 8:00 AM Pacific Operators G<br>9:00 AM The SOCO Group |
| 19             | 20   | 21  | 22   | 23  |
|                |  |   |  |   |
| 26             | 27   | 28  | 29   | 30  |
|                |  | 11/28/2012 TBA Vantage Pr                                     |  |   |
| 3              | 4  | 5   | 6  | 7   |
|                | 10:00 AM Cabrillo Power<br>10:00 AM Seneca Resources | 8:00 AM Venoco  | 8:00 AM Venoco<br>9:30 AM Maxum Petroleum          |   |



# Proposed New Regulations I

- Based on ICS
- Reference IMH and ACP
- Performance based:
  - Follow Planning “P”
  - Complete ICS 201
  - Complete an Incident Action Plan
  - Utilize & complete ICS forms to include 202, 203/207, 208, 209, 230, etc



# Proposed New Regulations II

- **Drill objectives rewritten to be performance based and measurable**
  - **Old “California-specific” drill objectives are no longer identified separately**
  - **All objectives are California Specific**
  - **Objectives are organized according to ICS structure**

# Proposed New Regulations III

- **Different drill deliverables between the two types of plan holders:**
  - **Tank Vessels, Nontank Vessels and Marine Facilities**
  - **Small Marine Fueling Facilities, Mobile Transfer Units and Vessels Carrying Oil As Secondary Cargo**

# Proposed New Regulations IV

- **For Tank vessels, nontank vessels and vessels carrying oil as secondary cargo:**
  - **Once in every three year drill cycle, Spill Management Team tabletop exercise must be conducted in California**
  - **Exercise shall test a Reasonable Worst Case Spill response**
  - **This will require testing “all” objectives through role playing as would actually occur during a real event**

# Proposed New Regulations V

- **Equipment Deployment Drills:**
  - **Drills become pass/fail events**
  - **Drill notification to Cal-EMA/OES required**
  - **Equipment deployment exercise shall take place in the first six months of the calendar year**
  - **If the exercise fails, a second exercise shall be required in the second six months of the calendar year**

# Proposed New Regulations VI

- **Scheduling of Drills (In-State)**
  - 30 day notice to schedule a SED
  - 60 day notice to schedule a TTX drill
  - Only 2 TTX drills allowed per week/per region on the drill calendar (2 north/2 south)
  - Unlimited SEDs allowed per week on the drill calendar

# What's Next?

- **Comments, ideas, and suggestions**
- **Scheduled/Pending Workshops**
  - **Sacramento, completed 19 October 2012**
  - **Los Angeles/Sacramento? Spring 2013**

# Questions?





# THANK YOU!

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## *Contact Information*

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