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](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)
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
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)
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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