OFFICE OF SPILL PREVENTION & RESPONSE

- INLAND PROGRAM
- SPILL MANAGEMENT TEAM
REGULATIONS

FOR PREVENTION FIRST SYMPOSIUM 2018
Main Topics Today

- Inland Oil Spill Mandates Summary
- Other Regs Down the Road
- Overview of Plan Holder SMT Requirements
- Spill Management Team Certification
Statewide Oil Spill Preparedness

- Original OSPR Mandates Limited to Coastal Waters

1991-2014

2014 -
Inland Applicability Generally
Inland Facility Regulations

- Emergency regulations 2015-2018
  - Contingency Plans
  - Drills & Exercises
  - Financial Responsibility
  - OSRO inland ratings
- Formal regulations
- Second 15-day comment period in Oct 2018
ERMA - ¼ Mile of Inland Waters
OSRO Ratings Inland

- **Inland Response Times**
  - 0-6 hours within an RPA
  - On-water capability rating
  - Terrestrial capability rating

- **Plan Holder need based on water-at-risk:**
  - *Perennial* = on-water OSRO
  - *Ephemeral/Intermittent* = terrestrial OSRO
    - National Hydrography Dataset
Future Rulemaking

Likely next rulemakings will include:

- Harmonize Inland Facility regs with Marine regs
- Shoreline Protection Table updates
- Administrative Enforcement updates
- Articulated tug-barges
SMT Requirements pre-2018

Plan Holder *statutory* requirements:

- Maintain a level of **readiness** that will allow effective implementation of the plan. [Gov. C. §8670.28.5]
- List a **Qualified Individual**. [GC §8670.29(b)]
- List spill **Contacts**. [GC §8670.28(a), (b)]
- Use an **Incident Command System**. [GC §8670.29(b)]
- Provide financial or contractual **arrangements** for all necessary equipment and services. [GC §8670.28(a)]
- **OSPR** shall evaluate spill plans, including personnel. [GC §8670.19(a)]
Plan Holder *regulatory* requirements:

- Identify SMT
  - SMT must acknowledge this capacity.
- Describe the *organization* of the Plan Holder’s spill response system and management team.

**Plan Holder Exercises**

- Quarterly notification to the SMT.
- Annual tabletop exercise with the SMT.

*Purpose*: “... evaluation of the spill management team(s) knowledge of the oil spill response plan...”
Assembly Bill 1197 (Limón)

- Defines SMT for oil spill purposes.
- Plan Holders must use a certified SMT.
- Establishes “certification” process.
- In-house SMTs
- Retained SMTs (shifts focus from PH to the SMT)
- Regulations to be developed in 2018/2019
Definition:

“Spill management team” means personnel and associated equipment that staff the organizational structure for managing some or all aspects of response, containment, and cleanup of a spill, utilizing an incident command or unified command structure.”
What’s New – 2 of 3

For Plan Holders

- Identify at least one certified SMT
- May use one or more certified SMT.
- Capable of managing a spill of the reasonable worst case spill volume identified in the plan.
- May use Plan Holder staff, if meets SMT certification.
- SMT’s directly responsible by contract, agreement, or other approved means to provide spill response activities pursuant to the oil spill contingency plan.
What’s New – 3 of 3

For SMT – Certification

- OSPR to establish criteria, e.g. timeframes, # of people
- SMT “may apply” for certification of capabilities.
- Application review by OSPR.
  - Must observe performance at exercise or spill.
  - May call an exercise.
- Certification valid 3 years.
- Periodic exercises (announced & unannounced)
- Certification is not transferable. (e.g. ownership change)
- OSPR may charge a fee for processing certification.
Working Concepts

- **Tiers** of SMT certification.
  - Minimum Personnel & On-Scene Times
- QI = initiation of spill management.
- SMT services can include QI services.
- Individuals or position-specific roles.
- Services for different areas of the state.
- PHs have 1 year to have a certified SMT from the date the regs are effective.
Plan Holders need an SMT of the appropriate Tier

- **Tier I:**
  - TV, NTV, MF, & Inland Fac w/ RWCS 1,000+ bbl

- **Tier II:**
  - VCOASC, SMFF, MTU, & Inland Fac w/ RWCS 500-999 bbl

- **Tier III:**
  - Inland facilities w/ RWCS volume up to 499 bbls

- **Qualified Individual / Position Specific Classification**
  - This is under development
## Personnel & Response Times

**Tier I**

<table>
<thead>
<tr>
<th>Personnel</th>
<th>On-Scene</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incident Commander</td>
<td>IC, PSC, SO, + one other on-scene within 6 hours.</td>
</tr>
<tr>
<td>Planning Section Chief</td>
<td></td>
</tr>
<tr>
<td>Safety Officer</td>
<td>Others on-scene within 8 hours.</td>
</tr>
<tr>
<td>Liaison Officer</td>
<td></td>
</tr>
<tr>
<td>Public Information Officer</td>
<td></td>
</tr>
<tr>
<td>Logistics Section Chief</td>
<td></td>
</tr>
<tr>
<td>Finance Section Chief</td>
<td></td>
</tr>
</tbody>
</table>
## Personnel & Response Times

- **Tier II**

<table>
<thead>
<tr>
<th>Personnel</th>
<th>On-Scene</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Incident Commander</td>
<td>On-scene within 6 hours.</td>
</tr>
<tr>
<td>• Planning Section Chief</td>
<td></td>
</tr>
<tr>
<td>• Safety Officer</td>
<td></td>
</tr>
<tr>
<td>• and two others (at least a PIO or Liaison)</td>
<td></td>
</tr>
</tbody>
</table>
## Personnel & Response Times

- **Tier III**

<table>
<thead>
<tr>
<th>Personnel</th>
<th>On-Scene</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incident Commander</td>
<td></td>
</tr>
<tr>
<td>Planning Section Chief</td>
<td></td>
</tr>
<tr>
<td>Safety Officer</td>
<td>On-scene within 6 hours.</td>
</tr>
<tr>
<td>and two others.</td>
<td></td>
</tr>
</tbody>
</table>
### Personnel & Response Times

- **Qualified Individual / Position-Specific**

<table>
<thead>
<tr>
<th>Personnel</th>
<th>On-Scene</th>
</tr>
</thead>
<tbody>
<tr>
<td>TBD</td>
<td>TBD</td>
</tr>
</tbody>
</table>

This is still being developed.
## Certification Exercise Objectives

### By Tier

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Timeframe</th>
<th>Tier I</th>
<th>Tier II</th>
<th>Tier III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notifications</td>
<td>30 min</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Staff Mobilization</td>
<td>2 hrs</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>ICS</td>
<td>4 hrs</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Operations</td>
<td>4 hrs</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Planning</td>
<td>4 hrs</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>PIO</td>
<td>8 hrs</td>
<td>●</td>
<td>●</td>
<td></td>
</tr>
<tr>
<td>Liaison Officer</td>
<td>8 hrs</td>
<td>●</td>
<td>●</td>
<td></td>
</tr>
<tr>
<td>Logistics</td>
<td>8 hrs</td>
<td>●</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finance</td>
<td>8 hrs</td>
<td>●</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Personnel Training

- ICS Training:
  - 100, 200, 300, 400
  - ICS Position Specific

- Successful participation in and completion of an OSPR exercise at least once every calendar year would be sufficient to maintain these training requirements.
Application for Certification

Information requested:

- In-House SMT or Contracted SMT.
- Regions in CA where SMT services offered.
- List of SMT personnel for ICS roles.
  - Training
- ICS system used (e.g. USCG IMH)
- Physical address, contact info.
Application Review

- Asking existing SMTs to submit an application within 90 days after the regs adopted.
- Application review by OSPR. (90 days)
- Must observe successful completion of objectives.
  - Recent completion will be accepted.
  - Provisional Certification granted until exercised.

*Details of the review times being developed*
SMT Significant Changes

- A significant change is one that would affect the SMT’s ability to respond consistent with its certification.
  - E.G. personnel, equipment, management, ownership

- Notice to OSPR 14 days prior to anticipated change.

- Immediate notice if the change is unforeseen.
Certification Adjustment

Certifications may be:

- **Modified**
  - e.g. can’t perform objectives

- **Suspended**
  - e.g. bankruptcy

- **Revoked**
  - e.g. cannot perform any of the certified services

Appeal process to challenge Certification adjustments.
Questions?

Thank You

Ryan C. Todd
Senior Staff Counsel
OSPR/DFW
ryan.todd@wildlife.ca.gov
916.324.3406