

Preparedness for Response Exercise Program (PREP)

17th Coast Guard District



June 2002

Nation-wide information on PREP is available online at:

<http://www.uscg.mil/hq/g-m/nmc/response/#PREP>

And by searching the federal register for "PREP" notices:

<http://www.access.gpo.gov/nara/cfr/cfr-table-search.html>

Background

- Formalized in 1994
- Oil pollution response focus
- Economically feasible
- Voluntary program?
- Gov't Expectations



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PREP Overview

PREP is currently intended for oil pollution response preparedness. Hazardous substance response preparedness guidelines are not included at this time.

Industry target:

- CG Regulated Vessels & Marine Transportation Facilities [i.e. Industry facilities and vessels/barges required to maintain a response plan and conduct an exercise program in accordance with 33 CFR 154 (facilities) and 33 CFR 155 (vessels).]
- EPA Regulated Onshore & Certain Offshore Non Transportation-related Facilities
- RSPA Onshore transportation-related pipelines
- MMS Regulated Offshore Facilities

Economically Feasible: CFR exercise requirements are intended to ensure industry preparedness while also being economically feasible to conduct/maintain. Two elements apply here:

- Participants pay their own way for all the requirements.
- The CFRs set limits on the annual number of exercises to be conducted, the durations for each type of exercise, and the type of equipment to be deployed.

Voluntary program?: Plan holders are required to meet the exercise requirements per applicable U.S. Code of Federal Regulations (CFRs). PREP is advertised as a voluntary option for industry to meet the CFR requirements of the signatory agencies. However, for USCG regulated industries the PREP guidelines and CFR exercise requirements are virtually identical.

Expectations: The PREP guidelines attempt to clarify government expectations for industry by:

- defining the scope and objectives for each exercise requirement
- providing documentation templates
- clarifying multi-year exercise requirements thru linkage to the *Response Plan Core Components* which are provided in the guidelines – Basically, all standard phases & issues of a typical response are required to be exercised once every three years.

Macro Execution

- Combination of internal & external exercises
- Focuses on:
 - ◆ Response plan validation
 - ◆ Equipment & personnel readiness
 - ◆ Command relationships
 - ◆ Standard response phases & issues

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Combination of exercises: Completion of CFR exercise requirements relies on plan holder maintenance of an “internal” exercise program and on periodic participation in government coordinated “external” exercises.

•“Internal” involves exercising resources/personnel within the plan holder’s organization/contractual control. 80-90% of the CFR exercise requirements are handled by plan holder “internal” exercise programs.

•“External” involves conducting exercises with the resources, personnel, and/or oversight of organizations outside of the plan holder’s organization/contractual control.

Note: OSRO equipment and personnel are considered internal assets of the plan holder’s response organization.

Focus: PREP exercise requirements center on continual validation of and improvements to the following:

•Response Plans: Validation of the facility/vessel/ACP plan assumptions for specific spill scenarios & utilization/availability of response resources.

•Equipment & personnel readiness: Hands-on demonstration of knowledge/skills to safely and effectively deploy properly maintained response equipment.

•Command relationships: Exercising activations, internal procedures, and external interactions for Spill Management Teams (SMTs) and/or a Unified Command (UC) .

•Response Phases ...: The incorporation of standard response phases/issues within industry exercise programs. These are referred to as *response plan core components* in the PREP guidelines (i.e. Appendix B). The components are: Notifications, Staff Mobilization, Response Management System (ICS/UC), Discharge Control, Situation Assessment, Containment, Recovery, Protection of Sensitive Areas, Disposal, Communications, Transportation Support, Personnel Support, Equipment Maintenance/Support, Procurement, & Documentation.

Internal Industry Requirements

Plan holder's program:

- Annual exercises:
 - ◆ QI Notifications
 - ◆ Emergency Procedures
 - ◆ SMT tabletops
 - ◆ Equipment Deployments
- OSRO Involvement
- Triennial cycle
- Documentation
- Credit for external drills & actual responses



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Plan holders are responsible for managing/coordinating, self-evaluating, self-certifying, and documenting their internal exercise program.

Annual requirements:

- Qualified Individual (QI) Notifications: Vessels – quarterly. Facilities – quarterly.
 - Emergency procedures: Vessels – quarterly. Facilities – quarterly (optional).
 - Spill Management Team (SMT) tabletops: Vessels – annually. Facilities – annually.
 - Equipment Deployments: Vessels – annually. Facilities – semi-annually.
- Requires a “representative sample” of equipment types in accordance with the response plan’s *Average Most Probable Discharge* scenario (i.e. a spill involving *the lesser of* 50 barrels of oil or 1% of the worst case discharge potential).
- One of the following drills shall be conducted annually as an “Unannounced” exercise: Emergency procedures, SMT tabletop, or Equipment Deployment.

OSRO Involvement: For response plans which site OSRO equipment as part of their response strategy, OSRO equipment is also required to be deployed: Vessels – annually. Facilities – semi-annually. “Representative Sample” requirements apply.

Three year requirements:

- The PREP guidelines provide a list of 15 *Response Plan Core Components*. The components which are appropriate for the facility’s/vessel’s response plan, must be exercised at least once every three years. Plan holders are responsible for incorporating the components into their long-term exercise plan to ensure this requirement is met. All 15 components do not have to be addressed in one exercise.
- A worst case discharge scenario shall be exercised during a SMT tabletop once every 3 years.

Documentation: Each exercise is required to be documented and the documentation is required to be kept on record at the facility/vessel for a minimum of 3 years. Exercise lessons learned which identify/recommend changes to the response plan (e.g. strategies, equipment, staging, etc.) shall be implemented in a reasonable timeframe and included in the next update to the plan. These records shall be readily available for CG inspection.

Credits for external drills and actual responses: Plan holders may take credit for these events as long as they met the requirements specified to the type of exercise and that proper documentation is completed.

Internal CG Requirements

Subarea Contingency Plans:

- Equipment deployments
- HAZWOPER training
- SMT Tabletops



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The 17th Coast Guard District's pre-positioned response equipment (e.g. VOSS, SORS, and ADDS systems) are annually maintained and deployed.

The District Response Advisory Team (drat) annually coordinates with Marine Safety Office (MSO), Pacific Strike Team (PST), CG cutter, CG aircraft, and state/local personnel to schedule/conduct appropriate training/deployments.

Safety training (i.e. HAZWOPER) is also provided by the drat to ensure personnel are familiar with recognizing hazards, proper personnel protective equipment (PPE), and decontamination procedures.

In each COTP zone, a Subarea Contingency Plan (SCP) tabletop exercise shall be conducted annually. State SMT members should also participate as available. A worst case discharge scenario shall be exercised during a SMT tabletop once every 3 years.

Credits for external drills (i.e. AreaExs and large Industry drills) and actual responses may be taken to met these internal CG requirements.

External Requirements

Government coordinated w/ Plan Holder Participation:

- Validation of internal exercise programs
- Gov't Initiated Unannounced Drills
- Area Exercises
- CG SAILS



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Validation of internal exercise programs: MSOs routinely conduct facility/vessel inspections of plan holders. During these inspections, exercise records are reviewed for compliance with the PREP guidelines.

Unannounced drills: Each COTP zone may conduct up to 4 unannounced drills per year.

The PREP guidelines further specify that:

- the scenarios for the drills are limited to average most probable spills
- the durations should be limited to approximately 4 hours
- the MSO shall attempt to schedule the drills as not to interfere with surge operations at the facilities/vessels.

A plan holder who successfully participates in an unannounced drill is not expected to participate in another unannounced drill for 36 months and may take credit for all internal exercise requirements which apply.

Area exercises: Typically one Area level exercise is conducted in Alaska each year. They may be Gov't-led (i.e. by the NSFCC – Elizabeth City, NC) or Industry-led (i.e. a plan holder selected by the COTP). COMDT (M) coordinates the scheduling on a three-year basis, which is posted in the Federal Register. Exercise requirements include:

1. Planning is conducted by a Joint Design Team (JDT).
2. The exercise must be for a minimum of 8-12 hours in duration.
3. Specific objectives are developed from the 15 response plan core components of PREP.
4. The scenario should be detailed enough to support the formation of a Unified Command (UC) and focus participant activities on accomplishing the objectives. A worst-case scenario is not required, though it may be exercised.
5. Participation of the Area Response Mechanism is required (i.e. SMTs, a UC, and an appropriate command post).
6. An equipment deployment is required, which is in keeping with the scenario used to exercise the UC/SMTs (i.e. type of equipment, location of spill, strategies discussed, etc.).
7. Organizations fund their own participation.
8. A joint evaluation report is required with an appropriate CG SAILS entrée (see below).
9. The participating COTP will provide certification of "Area Exercise Credit" to the industry plan holder following completion of the evaluation report. The credit is good for 6 years in all COTP zones.

CG SAILS: The CG SAILS system is an intranet based, lessons learned database which is intended to document all external exercise activity across the nation. MSOs are required to submit reports for all external exercises they conduct (annual summaries are acceptable) and shall assist Industry with submissions for industry-led area exercises. The website is: <http://lintra.comdt.uscg.mil/>

COTP Determinations

- State coordination
- Industry participants
- Definition of “Unannounced”
- Scenario & Scope
- What constitutes a “successful” exercise
- Verifications of internal programs
- Enforcement issues



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PREP Overview

The guidelines leave the following issues for the COTP to determine when coordinating the external exercise program:

- The level of state coordination and participation in unannounced drills.
- How industry participants are selected for external exercises (i.e. unannounced drills and area exercises).
- The definition of “unannounced” (e.g. all aspects of the drill held in secret, only the scenario unknown, the month known but not the exact date/time, etc.)
- Coordination with industry over the scenario & scope of area exercises.
- What constitutes a “successful” exercise.
- Verifications of industry internal exercise programs (including OSRO required participation).
- Enforcement options for plan holders who fail to maintain an internal exercise program, fail to successfully complete an unannounced drill, and/or fail to participate in an external drill (unannounced or area) when directed to do so by the COTP.

Upcoming Events



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PREP Overview

- 2002 - Update to the Guidelines
- 2003 - Southeast Gov't-led AreaEx during week of May 5th.
- 2004 - Prince William Sound Gov't-led AreaEx in 3rd Qtr.

Update to the Guidelines:

Process documentation is online at: <http://dms.dot.gov>

Once at the website, hit the "simple search" button and enter docket number "7514" in the appropriate box. You will be taken to the PREP docket site which contains the full record of comments since the process started.

Proposed changes include:

- Addition of Hazardous substance response exercise guidelines.
- Clarification of equipment deployment "representative sample" requirements.
- Clarification of OSRO participation in internal exercises.
- The definition of "timely" for deployment of equipment during unannounced drills (i.e. CFR one & two hour standards).
- A template for plan holders to track completion of their three year exercise requirements with regard to unannounced drills, use of worst case scenarios, and incorporation of response plan core components in exercises (i.e. the *Triennial Cycle Documentation Form*).
- New equipment deployment requirements for area exercises (i.e. at a minimum, tier-I worst case discharge capability).
- Clarification of the response plan core components contained in appendix b.

2003 Southeast Gov't-led Area Exercise:

The National Strike Force Coordination Center (NSFCC) is sponsoring the exercise. Coordination for an industry participant is currently in progress (May-June 2002). An MSO/industry pre-planning will be held in October. The NSFCC exercise planning schedule starts in January, with monthly planning meetings until the exercise in May.