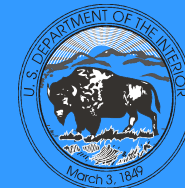
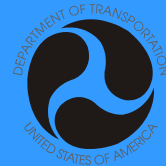


National Schedule Coordination Committee



EPA
OPS

USCG
MMS



PREP Guideline Changes Area Exercise Process

Bud Hunt - EPA Oil Program Center
Bob Pond – USCG Office of Response

Background

- Oil Pollution Act of 1990
Equipment testing and drills for ACPs, FRPs, VRPs
- Guidelines adopted in 1994
 - Adopted by EPA, USCG, OPS, and MMS
 - Periodic public meetings to assess
 - Aug 2000 first to recommend amendment/reissue
- Revised PREP Document found at:
<http://www.uscg.mil/hq/nsfcc/nsfweb> or
<http://www.uscg.mil/g-m/nmMisperceptionsEP>

Key Changes & Clarifications

- Equipment Deployment Exercises
 - Greater specificity of equipment types
 - Exercise record certifies plan holder determination that Spill Management Team (SMT) meets its response needs
 - Definition of regional OSROs
 - OSRO exercise in each operating environment of each planning area
 - Unless Area Committee/OSC agree to combined exercises
 - Exercise systems not individual equipment
 - Coordinate Exercises to test strategies

Key Changes & Clarifications

- Spill Management Team (SMT) Exercise
 - Contract SMT exercises
 - Criteria for multiple plan holder credit in multiple areas
 - Plan holder must observe and have opportunity to discuss plan holder specific issues
 - Exercise record certifies plan holder determination that SMT meets its response needs.

Key Changes & Clarifications

- Area Exercises
 - Scheduling Gov't/Industry Exercise 3 yrs out
 - Minimum Scope
 - Major Spill or
 - Worst Case Discharge Tier 1
 - Exercise Area response management system with unified command
 - Must include industry funded equipment deployment to test plan strategies.

Key Changes & Clarifications

- Government Initiated Unannounced Exercises
- Potential change in number of exercises in EPA Regions (up to 10% plan holders)
- Exercise assessment process
 - Confirm size of discharge and location
 - Definition of timely deployment
 - Definition of “Unsatisfactory”
 - Issuing credit dependent on exercise success

Current Situation

- Draft Guidelines posted and available at
 - <http://www.uscg.mil/hq/nsfcc/nsfweb> or
 - <http://www.uscg.mil/g-m/nmc/response/#PREP>
 - Published in Federal Register March 13, 2002
FR Volume 67, page 11368
 - Comments accepted for 60 days (May 13, 2002)
- Revised PREP Guidelines publication Aug 2002
 - Unless serious objections received
- PREP Workshop Nov 8, 2002
 - Following Clean Gulf 2002, Galveston Texas

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National Strike Force
Coordination Center
Support for Area Exercises

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NSFCC Support to Government Led Area Exercises

- 6 Per Year
 - 5 USCG FOSC, 1 EPA FOSC
- Assess Area Contingency Plans
 - Area Committee Participation in Process
- Exercises aligned with PREP Guidelines
 - Process Improvement, Non Punitive

Area Exercise Misperceptions

- Must be Large, Lengthy, and Expensive
- Response Organizations Must Use ICS
- EPA Exercises Must Include HAZMAT Response

NSFCC Exercise Development Process

- Response Organizations Set Exercise Objectives and Scenario
- Evaluation Objectives – Set by Participants, Process Focused
- Geared to Meet Needs of Response Community

NSFCC Exercise Services

- Development Support
 - Dedicated Exercise Team
- Execution Support
 - Core Control and Controller Staff
 - Control Communication and Information System
- Exercise Assessment Support
 - Administrative, Facilitation Support

NSFCC Exercise Formats

- Facilitated Table Top Exercise (TTX) – Policy Decisions
- Structured Command Post Exercise – ICS Training
- Unstructured Command Post Exercise – Response Management Process
- Equipment Deployment Exercise – Equipment Deployment

NSFCC Limitations

- Budget
- Process
- Schedule

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